



# Code of Conduct Manual for All Personnel

Bangkok Life Assurance Public Company Limited and subsidiaries

**For the Year 2569**

## Purpose

To encourage people to obtain life insurance that suits their life goals for the sustainability of their families and Thai society.

## Vision

To be the Most Caring Life Insurance Company.

## Mission

### *Caring about Customers*

To deliver exceptional customer experience while empowering them to build security and wealth through our sincere personnel and modern technology and by delivering products, services and benefits tailored from a genuine understanding to meet customers' diverse needs.

### *Caring about Agents and Financial Advisors*

To enhance the potential of our agents and financial advisors, empowering them to thrive without limitations and be ready for rapidly changing market conditions, while pursuing secure growth, happiness and pride in their work, through teamwork promotion, intensive training and modern digital tools.

### *Caring about Partners*

To drive collective growth and success by understanding every partner's goals and directions, designing coordinated processes, and fostering continuous mutual improvements.

### *Caring about Employees*

To promote employees' happiness, career advancement and job security by continuously enhancing their skills in diverse aspects and providing a work environment that respects diversity, honors equity, fosters teamwork, encourages inclusion, and ensures that everyone feels they belong.

### *Caring about Shareholders*

To generate appropriate returns for shareholders with a focus on long-term secure and sustainable growth by building Bangkok Life Assurance into a leading life insurance brand known for its commitment to caring, all while adhering to principles of good corporate governance.

### *Caring about Society*

To contribute to the improvement of the overall quality of life in Thai society by promoting financial planning literacy, raising awareness of life insurance benefits, and encouraging good health among the public.

### *Caring about Environment*

To guide the organization toward carbon neutrality with an emphasis on the development of processes for managing energy consumption, water usage and waste.

## Core Values

*C - Care*

To attentively listen to the opinions and concerns of others, while also care about the well-being of colleagues and the broader community.

*A - Assistance*

To demonstrate willingness to help others and readiness to share knowledge and experiences.

*R - Reliability*

To possess expertise in one's field and take full responsibility for one's words and commitments.

*E - Empathy*

To understand diverse opinions, avoid self-centeredness and prioritize the opinions and feelings of others.

## Preface

The Company's Code of Conduct outlines corporate values that all executives and personnel adhere to. It is an important foundation for governance, strengthening of the customers' financial and life stability and the confidence of stakeholders that the Company has been continuously receiving. This Code of Conduct Manual is a compilation of guidelines in various matters that define scope of practices that are within the framework of ethics and integrity.

Personnel at all levels of the Company must pay attention to this manual. It is all personnel's duty and responsibility to study and strictly not neglect to adhere to. If there is a violation of the principles set forth and the investigation results prove it is an actual violation, the person who has violated this manual will be receive disciplinary action as per the Company's stipulation and/or related laws. This is to reflect the organization's values and culture of high ethical standards.

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## Code of Conduct

### 1. Human Rights, Social, Environment and Safety

#### 1.1 Human Rights

The Company supports the protection of human rights, freedom, and equality of all stakeholders inside and outside the organization based on the universal declaration of human rights. The Company does not accept any actions involving human trafficking and labor exploitation, and refuses to conduct business with any business partners or individuals committing such activities.

The Company values and endorses diversity in skills and abilities of employees to respond to every dimension of its operations. Bangkok Life Assurance respects differences of every individual as well as the value of diversity regarding race, religion, gender, age, education etc. The Company does not tolerate discrimination, nor sexual harassment in any form and upholds to strict compliance with applicable regulations in all of the Company's activities and operations.

Executives and employees must respect differences, be respectful to every coworker regardless of their position levels, and refrain from committing disparagement or sexual harassment.

#### Guidelines:

- You must respect others' rights and freedom, such as freedom of speech and expression, and must not discriminate against them based on their race, religion, sex, social status, physical condition, cultural belief, political belief, in accordance with the human rights law and the universal declaration of human rights.
- You must select job candidates on a fair basis and take into account their educational background, past experiences, physical condition which do not obstruct them from carrying out their duties, and other qualifications. You must also support training, development, effectiveness enhancement, and career advancement and set fair compensation reasonable for their work features and performance.
- You must treat others politely and respect them. You should not verbally insult, disparage, attack, curse, harass, or defame others.
- You must maintain fair working conditions and be a role model in conducting business according to human rights principles, such as giving importance to women's rights, not using child labor which shows respect for human rights principles, as well as adhering to international human rights standards, which include rights, freedom, and equality.
- You can study additional details from the Human Rights Policy.

<https://www.bangkoklife.com/en/about/child/139>

**Case 1**

What should you do if your coworkers talk about religions and share various opinions that may lead to conflict?

**Advice**

The Company gives importance to human rights principles regarding equality among religious differences. Therefore, you should remind yourself that you need to respect others' rights and freedom of opinion and expression. To prevent conflict, you should avoid discussing such topic.

**1.2 Social, Environment, and Safety**

**1.2.1 Social Development and Harmonious Living**

The Company is determined to build stability for people in the society and endorses the idea of everyone having security in every life stage and enhancing their knowledge, quality of life and self-sufficiency. The Company requests that its personnel be aware of the mission and take part in activities to promote social and environmental development on an ongoing basis.

**Guidelines:**

- Employees with duty of providing advice on life insurance and financial planning, must uphold the profession's Code of Conduct and provide advice that suit each individual's needs, financial position, and risks.
- You must pay attention to, monitor, or coordinate with responsible units in resolving problems and complaints in a fair manner and in line with laws/regulations.
- You must adhere to laws, regulations, local cultures, and social etiquette in order to maintain peace and harmony.
- You must be eager to learn new things and continue to develop yourself so as to ensure that good services are delivered. You should appreciate others' value, contribution, and creativity.
- You should volunteer for social development activities.
- You should promote, preserve, and maintain local traditions and cultures by participating in and supporting the public and private sectors' social development policies and activities.

**Case 1**

What should you do if your friend asks you for advice on savings planning approaches?

**Advice**

You should explain to your friend the nature and differences of various saving approaches, such as deposits, life insurance, etc., including the suitability of each type of product for different savers, so that your friend can evaluate the products that suit them.

**Case 2**

If people in your community still lack financial planning knowledge, as a financial advisor what should you do?

**Advice**

You should help provide them with financial planning knowledge, starting from your surrounding communities in order to enhance their stability and happiness in life.

**1.2.2 Environmental Conservation and Use of Natural Resources**

The Company upholds the importance of environmental conservation. It employs suitable technology to reduce natural resource consumption and builds environmental awareness among employees and others.

**Guidelines:**

- The Company strictly and continuously participates in social responsibility regarding quality, safety, occupational health, and the environment. The use of natural resources must provide maximum benefit, with consideration of the importance of the environment and safety of related stakeholders. The Company also promotes social activities that preserve the environment and develop quality of life of the community, according to the principles of sustainable development.
- You must efficiently and wisely consume natural resources. Electricity, water, paper, and other materials should be utilized according to the principle of reduce, reuse, and replenish.
- You must use environment-friendly materials, tools, office equipment.
- You should promote awareness of environment conservation to coworkers and surrounding societies through appropriate channels.
- You should take part in environmental conservation and social development activities along with people, organizations, and business partners in your community.
- You can study additional details from the Energy and Environmental Conservation Policy.

<https://www.bangkoklife.com/en/about/child/138>

**Case 1**

If your function uses a large amount of paper for printing, and occasionally, those documents are not used for consideration because they are not related to regulations and/or are not required to be printed, what should you do?

**Advice**

You should print only documents that are required to be printed and use both sides of the paper.

**1.2.3 Hygiene and Safety**

The Company places great importance on all personnels' good mental health, hygiene, and safety. It evaluates situations that may affect hygiene and safety before carrying out any actions. It also ensures that the organization, work processes, and office equipment and tools are safe for use.

**Guidelines:**

- You must comply with applicable health and safety laws, standards, and guidelines and must cooperate in preventing problems and minimizing their possible effects.
- You must promptly report to your supervisor or persons concerned when encountering irregularities of office equipment or office areas that may harm health and safety in the workplace.
- The Company must establish plans for controlling, preventing, and managing emergencies, such as conflagration, which can occur at any areas of operation.
- You must take care of and examine your health and that of your co-workers and other persons concerned before performing work. You must take a leave or order your subordinates to take a leave if you or they do not feel well.
- You should appropriately promote awareness on hygiene and safety among people of the organization, surrounding communities, and business partners through various channels.

**Case 1**

What should you do if your co-workers develop COVID-19?

**Advice**

You should inform your co-workers to refrain from entering the office, and inform the office building services section to clean the work space and surrounding areas of those who are sick in order to reduce the COVID-19 contagion risk.

Case 2

What should you do if you find a damaged electrical equipment?

Advice

You should report to the office building services to check and repair the equipment.

## 2. Legal and Regulatory Compliance

The Company is determined to conduct its business in accordance with the governing laws and regulations in order to maintain trust and confidence among regulators and stakeholders. Complying with laws and regulations is paramount to business operation. Everyone must strictly abide by the laws and regulations because you are representing or acting on behalf of the Company.

Guidelines:

- You must perform your duty in compliance with the Company's stipulation and rules. You are expected to study and develop your understanding of pertinent laws. In case of questions, consult your supervisors or the Compliance Office.
- You must acknowledge and understand your responsibilities in complying with laws, regulations, and orders related to your duties.
- You must review consistency of complying with relevant laws, rules and, orders; cooperate, promote, support, and ensure consistent compliance.
- You must not support or partake in any acts or concealment of acts that are in breach of laws or regulations. You should also avoid finding loopholes in laws and regulations to commit unlawful acts.
- You must always be aware that you are performing duties under the Company's name; therefore, you must behave in a way to uphold morality, correctness, and legitimacy in accordance with law, morality, and social norms.
- You can study additional details from the Compliance Policy.

<https://www.bangkoklife.com/en/about/child/133>

### Case 1

Current law is undergoing major changes which may be enforced in the near future. The new amendments will be beneficial and allow for better justice for consumers. As the Company's executive and employee, what should you do?

### Advice

You should monitor and study the details of the given law, together with the Compliance Office and other concerned sections. Having a proper understanding of the new regulatory requirements would allow you to make all necessary adjustments towards products, services and internal systems before the new law takes effect. Any adjustment made must be based on a business conduct that is fair to consumers and stakeholders.

## 3. Risk Management

Risk management is a key component of good corporate governance. The Company is committed to and prioritizes risk management, including creating and cultivating a risk management culture throughout the organization to achieve organizational objectives and goals and manage risks to an acceptable level.

### Guidelines:

- As a Risk Owner, you must be aware of the risks associated with your role and activities.
- You must recognize the importance of risk management, which impacts the achievement of objectives and leads to organizational success.
- You must consistently implement the Company's established risk management guidelines until they are well-known and shared with everyone in the responsible department.
- Prudent risk acceptance involves making sound decisions based on comprehensive facts to maximize the opportunity for action and enhance the risk management expertise required to determine the Company's acceptable risk level.
- You must avoid and/or be careful of negligence in order to deliver the best possible service to policyholders, customers, and stakeholders.
- You must promptly report risks and/or losses to your supervisor and the Risk Management Department upon discovery.
- You must participate in the Company's risk management as a duty and make it a part of the organizational culture.

#### 4. Integrity of Financial Reporting

Financial report's accuracy and timeliness are main factors for effective management. The Company establishes appropriate internal controls to protect its financial report accuracy and reliability. The Company complies with regulations related to financial report documentation and reporting, and does not accept any acts against such regulations.

**Guidelines:**

- Set up effective and efficient controls and internal audit systems, in accordance with the international standards.
- Set up risk management system to manage and keep material risks in the range of risk appetite without affecting the Company's procedures for achieving objectives.
- Set up effective monitoring and assessment system, and regularly review the work system.
- Prepare financial reports that are accurate, complete, reliable, and comply with regulations.

#### 5. Responsibility to Customers<sup>1</sup>

##### 5.1 Fair Treatment to Customers

The Company takes priority of the customers' interest and satisfaction by offering quality products and services that can meet the needs of customers of all ages and help strengthen their security, wealth, stability, and sustainability. The Company encourages all kinds of transparent, clear, and fair communication to customers, such as advertisement, sales offering document, etc.

**Guidelines:**

- Materials for products and services<sup>2</sup> presentation must be based on facts and must not be distorted that it could mislead customers about the features of products or services.
- Prepare sales proposal and public relations materials in order to prevent misunderstanding or information distortion.
- You must deliver your services and meet the needs of customers on the basis on sincerity.
- You must heed, follow up on, or coordinate with the section in charge of solving complaints. You must uphold fairness for all parties concerned.
- You must regularly acquire new knowledge and study new innovation to improve your service capability.
- You can study additional details from the Fair Customer Treatment Policy.

<https://www.bangkoklife.com/en/about/child/159>

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<sup>1</sup> Customers mean the policyholders, those related to the policyholders, unitholders, etc.

<sup>2</sup> Products and services mean life insurance policies of the Company and its financial planning services.

### Case 1

A prospect customer is interested in life insurance but lacks the knowledge. What advice should you provide?

### Advice

- 1) You must accurately and thoroughly explain about policy coverage and benefit.
- 2) When presenting products and services, you should use sales proposal materials provided by the Company in order to prevent misunderstanding or information distortion.
- 3) You must neither present policy information outside the scope of coverage nor distort its details.
- 4) You should advise her to take on insurance that matches her income level. Once the contract is entered into by both parties, she has to pay premiums according to the policy's terms of payment.

## 5.2 Personal Data

The Company respects privacy of personal data<sup>3</sup> owners, and is aware of trust received from them for the Company to collect, record, and use in operation, such as personal data of personnel, customers, and other related persons. The Company uses personal data carefully and has safety measures to prevent them from being illegally used, disclosed, transferred to other persons.

### Guidelines:

- You must respect others' privacy and must seek consent from particular person whose data will be used, disclosed, or sent to other users.
- You must take good care of personal data that is under the Company's possession. Collecting, recording, using, disclosing, or transferring personal data shall be done in a careful manner, and only when necessary, as specified by laws.
- You must be aware of the importance of personal data, especially customers' data. You shall strictly retain confidential data and comply with the Company's measures to maintain data security.
- You can study additional details from the Personal Data Protection Policy.

<https://www.bangkoklife.com/en/about/child/183>

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<sup>3</sup> Personal data means personal identifiable information such as name-last name, date of birth, address, telephone number, health record, criminal record, work history, etc.

**Case 1**

In the event that a company unit wishes to organize an activity or project that requires the collection, use, or disclosure of personal data, can the unit proceed with the activity?

**Advice**

If an organization wishes to organize an activity or project that requires the collection, use, or disclosure of personal data, the unit must maintain a Record of Personal Data Processing (RoPA) to record details of the activity, such as the purpose, items of personal data processed, legal basis, retention period, and security measures. This information can be used to verify that the activity or project is appropriate and complies with established policies and laws.

**6. Conflict of Interest<sup>4</sup>**

You must not use your work position to seek benefits or advantages for yourself or others, which lead to conflict of interest. If conflict of interest occurs, you must report to supervisor to manage such risk.

Your external activities may bring conflict of interest. You must disclose external activities that may create conflict of interest to the Company, stockholders, customers, and stakeholders. Examples of external activities include conduction of business, private relationships, political contributions, family's activities, and other activities that may conflict with benefits of the Company, stockholders, customers, and stakeholders. You must report the actual and potential conflict of interest.

**Guidelines:**

- You must not enter, partner or join, or hold shares with control, take directorship or executive position at competing businesses or conduct a business similar to that of the Company.
- You must not be involved in any transactions when you are related to a counterparty, such as family members, close relatives, close acquaintances, or an entity that you own or hold partnership, even though your involvement will bring benefits to the Company.
- You must not seek gains from the information you or others know over the course of performing work duties.
- You should avoid working on your personal matters or businesses that are out of the Company's scope of work as it may affect work under your responsibility and the Company's image.
- When encountering incidents that may lead to conflict of interest against the Company, you must promptly report them to your supervisor.
- You can study additional details from the Prevention of Conflict of Interest Policy.

<https://www.bangkoklife.com/en/about/child/134>

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<sup>4</sup> Conflict of interest means a situation or action in which directors, executives, or employees have personal interest that influences them in making a decision or carrying out their duty. Such situation or action has direct and indirect effect on the Company.

**Case 1**

You are a member of the committee in charge of hiring a contractor for office renovation, and learn that one of your relatives who owns a construction company also enters the bidding for this project. What should you do?

**Advice**

You should inform your supervisor and the chairperson of the committee, and withdraw your participation in selecting a bid winner to avoid conflict of interest.

**7. Management of Inside Information and Insider Trading**

The Company is listed on the Stock Exchange of Thailand (SET), and therefore, places importance to operations that create equality and fairness to all shareholders. Material inside information not yet disclosed to public that may lead to change of stock price, is considered as inside information used for the Company's operation and is confidential. The Company and its stock price would be affected if disclosed. The Board, committee, and all personnels, therefore, must keep internal information confidential, must not disclose to others the internal information obtained from performing duties, must not use it for trading securities or causing the Company to lose benefits whether directly or indirectly.

**Guidelines:**

- You must not use inside information to seek benefits in trading securities<sup>5</sup>.
- You must not disclose inside information to others to seek benefits or trade securities.
- You can study additional details from the Regulation No. 2/2568 (2025) Re: Use of Inside Information and Securities Trading.

<https://www.bangkoklife.com/en/about/child/160>

**Case 1**

You learned that your co-worker saw the Company's financial statement before it is publicly disclosed and purchased or sold the Company's shares during 30 days before disclosure of the financial statement. What should you do?

**Advice**

Inform Audit Committee / Internal Audit

Tel: 0-2777-8233-4 E-mail: [audit\\_committee@bangkoklife.com](mailto:audit_committee@bangkoklife.com); and/or

Corporate Governance and Sustainability Committee / Compliance Office

Tel. 0-2777-8861 Email: [compliance@bangkoklife.com](mailto:compliance@bangkoklife.com)

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<sup>5</sup> Securities mean the Company's common stock, including debt instruments, equity instruments, and other products in capital markets that the Company is investing in or will invest in.

You may choose to remain anonymous. The Company protects whistleblowers' information as per Whistleblowing Policy.

### Case 2

You work in a function that develop products and learn that the Company is going to be the first insurer to launch a new type of product. Your friend who works for the Company's competitor asks you about the new product. What should you do?

### Advice

The product information not yet disclosed to the public is the Company's inside information and may affect the Company's operation or stock price. You should tell your friend that the information he asks about is the Company's confidential information that cannot be disclosed.

## 8. Communication with the Public

The Company strives to communicate about being responsible to social, presents appropriate topics, and avoid topics that may cause social conflicts. It also assigns specific personnels to communicate on behalf of the Company to ensure accurate, complete, and clear communication with outsiders.

### Guidelines:

- Only authorized executives and employees can provide information on behalf of the Company. The information provided to regulators, investors, and the public must be accurate, appropriate, fair, timely, and intelligible.
- You must not present topics that may cause social conflicts, such as national institutions, religion, monarchy, politics, beliefs, international relations, opinions on genders or immoral topics, social inequality, discrimination, and breaches of human rights.
- You must not share personal opinions on behalf of the Company.
- You must use social media platforms carefully, consider about the code of conduct, and comply with regulations, standards, and the Company's policies.
- You must use the system or emails provided by the Company for business communication, and not for personal use. In case of necessity, you may carefully use such system without violating regulations and the Company's policies and standards.

**Case 1**

You found a post on the public. A person claimed to be the Company's employee and provided inaccurate information, which causes misunderstanding. Should you correct that person by posting accurate information on behalf of the Company?

**Advice**

If you are not authorized to do so, you should not. Instead, report the post to concerned persons or supervisors.

**9. Receiving and Providing Gifts and Anything of Value<sup>6</sup>**

Receiving or providing gifts whether in the form of property, services, facilitation, hospitality, or participation in seminars with business-related persons should be customarily reasonable or in line with the business traditions of that particular locality or country. The value of the gifts must be reasonable and must neither cause unfair incentive or decision making nor create the impression of assistance of obligation between the provider and the receiver.

**Guidelines:**

- You may receive or provide gifts according to the culture, traditions, or business etiquette practiced in a given locality. However, the value of the gifts must not exceed the necessity and appropriateness.
- You must not receive or provide cash, cheques, bonds, stock, gold, jewelry, real estates, or other similar objects as gifts.
- You should not receive or provide gifts or anything of value that may impact the Company's image or may induce any person to make a certain decision or abuse his duty.
- You must not give gifts to any persons, agencies, or organizations which declare that they do not accept gifts from any organizations.
- You must not ask for gifts or anything of value from business partners under any circumstances.
- If you, on behalf of the Company, receive a gift with value exceeding 3,000 Baht per person per time, you must declare the receipt of such gift to the Compliance Office through the specified form.
- If you, on behalf of the Company, provide a gift with value exceeding 3,000 Baht per person per time, you must obtain supervisor's approval and declare the provision of such gift to the Compliance Office through the specified form.
- You can join seminars or training events held by external organizations that are current or prospect business partners. Your participation must not affect your business decision making.

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<sup>6</sup> Gifts mean money, assets, or any other benefits given to strengthen a relationship or as a prize, gratuitous gift, donation, or incentives. Anything of value includes activities participation, such as training course, seminar, or welcoming events, etc.

- You must provide evidence of expense specifying the value of property, service, or hospitality for verification.
- When receiving hospitality, you must consider the appropriateness. If it is unnecessary, you should avoid it. Otherwise, you should report to supervisor.
- You can study additional details from the Anti-Bribery and Corruption Policy.  
<https://www.bangkoklife.com/en/about/child/47>

#### **Case 1**

A business partner gave a New Year gift basket to one of our executives, containing a bottle of wine with approximate value of 15,000 Baht. What should that executive do?

#### **Advice**

He needs to decline the gift and politely explain to them about the Company's intention. Receiving such gift may create the impression of mutual support or obligation, which may be considered as corruption or bribery.

If he cannot decline and needs to receive the gift, he must report to the Compliance Office, using the specified form. If the gift can be utilized internally, it can be sent to the Administration Department to determine work functions that can benefit from the gift. Alternatively, it can be sent to the Human Resources Department.

#### **Case 2**

A business partner invited you to join a seminar in another town. That business partner also offered to pay for all expenses to be incurred including meals, accommodation, and fares. Can you join the seminar?

#### **Advice**

You can join the seminar if its purpose is to enhance and exchange knowledge or to strengthen business relations. However, your participation in the event should not influence your decision making. You must also seek approval from your supervisor beforehand. Once you are granted approval by your supervisor, you need to inform the Human Resources Management Department and follow the usual processes.

## 10. Information Technology and Intellectual Property

### 10.1 Information Technology

The Company places a great emphasis on the security and effective use of its information technology systems and other properties. They shall be maintained and protected from unauthorized access, disclosure to unrelated persons, and misuse, which cause damage to the Company's reputation and properties, or pose negative impact.

**Guidelines:**

- You must strictly follow the Company's policies, operational frameworks, and cybersecurity performance standards; study and follow Accepted Usage Standard to acknowledge the guidelines and prohibition on the usage of the Company's information technology systems.
- You must use the information technology systems and data effectively and prevent them from unauthorized access by strictly following the "Clear Desk Clear Screen<sup>7</sup>" measure.
- You must store work files and electronic information in the designated place.
- You must consult the information technology team that is in charge of information security before installing any programs on the Company's computers.
- You are not allowed to use the information technology systems to access or transfer unethical information or for illegal activities. Also, you must avoid opening files from unclear sources, or using recording devices that have been used with computers suspicious of containing dangerous software.
- You must not disturb others' computers and information technology systems.
- You must keep your computer log-in ID and passwords confidential. You must not leave a document containing your ID and password visible by others.
- You must take care of the Company's properties and prevent them from being damaged, lost, or stolen. You must inform the asset control unit for any repair requirements.
- You must use the Company's information carefully. There must be appropriate measures on unauthorized access prevention to prevent the Company's information from unauthorized access and leakage.
- The Company must develop security management system that is in line with the laws and international standards, and ensure regular evaluation and review.

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<sup>7</sup> Clear Desk Clear Screen means keeping documents, information, or data-recording devices away from the desk or unsafe places when not in use, and turning off computer screen and/or logging out of the IT system when not using.

**Case 1**

You found that your co-worker sent personal data or the Company's important information outside the Company via email, as a part of his work operation, without encrypting the data, what should you do?

**Advice**

You should tell him that the Company requires that files on emails be encrypted. He can use 7-Zip program and select encryption as AES-256, then set a secure password.

**Case 2**

What should you do if your coworker leaves his desk without locking their computer desktop?

**Advice**

You should tell him to always press "Window and L" buttons before leaving his desk to prevent unauthorized access to information on his computer.

## 10.2 Intellectual Property

Intellectual property is a valuable asset for the Company. All personnels are expected to protect it from unauthorized use or disclosure, and misuse. They shall respect and refrain from infringing others' work, invention, research and development, or intellectual property.

**Guidelines:**

- You must always be aware that pieces of work such as computer programs, audio and visual materials, videos, voice records, which are produced over the course of business are the Company's copyright.
- You must protect the Company's intellectual property from being infringed, disclosed, duplicated, altered, or used without authorization.
- You must respect and refrain from infringing others' intellectual property. You must not use others' copyrighted work unless you are given permission from the copyright owner. Also, you must report to your supervisor or intellectual property caretaker when you notice actual or potential intellectual properties infringement.
- Before entering into any contract or legal transaction, you must clearly address the intellectual property rights. If you have any questions, you can consult the person in charge of intellectual property of the Company or the Legal Office.

**Case 1**

While preparing a magazine to promote the Company, you find that the pictures used are copyrighted by external owner. What should you do?

**Advice**

You should inform the person who uses those photos and seek permission from the copyright owner so as to give proper credit to his work. Otherwise, they can replace them with other photos owned by the Company.

**Case 2**

You need to use a computer program that the Company does not currently have. You know a shop that sells it. What should you do?

**Advice**

You are not allowed to install a computer program to the Company's computer as it may lead to a copyright infringement or a lawsuit proceeding brought against the Company. You should consult the Information Technology Division for further advice.

## 11. Conducting Business Overseas

When conducting businesses overseas, the Company is determined to comply with applicable laws of the countries in which it operates and performs its duty as a good citizen. It also takes into account local environment, culture, and traditions.

**Guidelines:**

- You must study and comply with the laws, orders, and rules of the country in which you invest and conduct business, as well as respect local customs, traditions, and culture. If you find that the rules, regulations, or operating procedures including the customs, traditions and culture of the local area are different from the company's practices. Consult the relevant agencies before taking any action.
- You must study changes in laws imposed in the country in which the Company operates on a regular basis. When in doubt, you can consult the Legal Office or persons in charge of legal affairs.
- You must take careful actions and must not breach applicable laws of the country in which the Company operates. You should respect the local culture and traditions while residing in that country.

**Case 1**

You have to work in a foreign country in which the Company's business operates. Laws of that country differ from those of Thailand. What should you do?

**Advice**

You should study and follow the laws, orders, and rules of that country. If you need help, consult Legal Office or legal experts.

## 12. Trade Competition

The Company operates on the basis of integrity and honesty. It supports free and fair competitions and does not undertake any actions which are in breach of the antitrust law. It does not carry out any actions in unfair manners that could cost its competitors their business opportunities.

**Guidelines:**

- You must be aware of complying with laws regarding fair and legal competition in every place that the Company conducts its business.
- You must not enter into any kinds of agreement with a competitor or individual which could lead to unfair competition, such as negotiating prices with competitors before auction, or talking or debating with competitors on trade secrets.
- You must not seek competitors' confidential information using dishonest, unlawful, or inappropriate means.
- In case the Company becomes a market dominant of any product or service, it must not use such power for unfair competition.
- When commenting about competitors or their products or services, you must only use facts and must not make personal comments, suggestions, or accusations based on false information or data from unreliable sources.
- Business mergers may cause a reduction in competition or monopoly in a particular market. You should consult an expert in competition law to check the necessary legal procedures before proceeding.

**Case 1**

Your customer asks you to compare the Company's products to those of its competitors. As a product advisor, what should you do?

**Advice**

You should only provide her with the competitors' information that can be acquired from a trusted source, such as on competitors' websites, etc. and provide your opinions about their products or services based on facts only.

### 13. Anti-Fraud, Corruption, and Bribery

The Company encourages all personnels to be aware of anti-fraud, corruption, and bribery; and strives to comply with anti-fraud, corruption, and bribery regulations by setting up internal control system to prevent them. You must perform your duties transparently, prudentially, carefully, and must not get involved in any kinds of corruption whether directly or indirectly. Moreover, if you notice actions related to fraud, corruption, or bribery; you must not stay negligent and must report to responsible person or whistle blow through channels and collaborate with the investigation.

#### Guidelines:

- The Company arranges trainings for personnel to be aware and avoid getting involved with fraud, corruption, and bribery.
- You must not conduct any acts which can be regarded as fraud, corruption, or bribery with intention to influence somebody to arrange, act, or delay an action for unlawful gains.
- If you are requested by a public or private entity, either local or foreign, to provide or offer a gift, property, or something in return regardless of its form or value which can be regarded as bribery to seek unlawful gains, you must reject the request and provide the requester with an explanation.
- You must not ignore or disregard actions which could get the Company involved in fraud, corruption, or bribery. You must promptly report the incident to your supervisor or unit in charge and cooperate in the fact-finding process or investigation to ensure fairness for all parties concerned.
- In making a donation or sponsoring an event, you must ensure transparency and compliance with applicable laws and regulations. You must also ensure that the donation will not be used for fraud, corruption, or bribery.
- You must remain prudent in conducting transactions with any person, legal entity, or organization which may be involved in fraud, corruption, bribery, or illegal activities.
- You can study additional details from the Anti-Fraud Policy <https://www.bangkoklife.com/en/about/child/45> and the Anti-Bribery and Corruption Policy. <https://www.bangkoklife.com/en/about/child/47>

#### Case 1

While trying to sell a group insurance policy to a corporate customer, you are asked to provide a gift, which could be regarded as bribery to seek unlawful gains. What should you do?

#### Advice

You must reject the request and explain about the Company's intention of not supporting fraud, corruption, bribery, and activities for unlawful gains.

**Case 2**

What should you do if you witness your coworker's unintentional action that may lead to the Company's involvement in fraud, corruption, or bribery?

**Advice**

You should warn and advise her to study the Anti-Fraud Policy and its guidelines, Anti-Bribery and Corruption Policy and its guidelines; Code of Conduct Handbook. Your coworker can also consult the Compliance Office.

**14. Anti-Money Laundering and Counter Terrorist Financing**

The Company is aware of importance of anti-money laundering and terrorism financing regulations, and establishes guidelines to be in line with Act of Anti-Money Laundering. The Company strives to protect itself from being a tool for money laundering or terrorism financing process, places importance to monitoring and whistleblowing, and monitors to maintain accurate documentation of financial records and facts to comply with domestic and foreign regulations.

**Guidelines:**

- You must comply with the anti-money laundering and terrorism financing regulations and the Company's policies.
- You must report to supervisor or the Compliance Office if you notice suspicious or abnormal transactions.
- You can study additional details from the Anti-Money Laundering and Combating the Financing of Terrorism and Weapons of Mass Destruction Policy.

<https://www.bangkoklife.com/en/about/child/158>

**15. Political Contributions**

The Company maintains political neutrality and does not carry out any actions to support any political movements, parties, alliance, politically influential groups, election candidates either directly or indirectly. However, the Company respects its employees' political rights and freedom as a citizen under the Constitution.

**Guidelines:**

- You must exercise political rights under your own name, and refrain from carrying out any actions that could cause public misunderstanding that the Company is involved with, interested in, or supportive of any political movements, parties, groups, influential figures, or election candidates. For example, you must not wear the Company's uniform or use any kinds of the Company's symbols, and must not use the Company's name when participating in political activities.
- You must not use the Company's resources or properties when participating in political activities.

- You should avoid expressing politics opinions at work or in working time in order to prevent conflicts among coworkers.

**Case 1**

Can you request a leave to join a political event?

**Advice**

You can take leave by following the Company's leave policy. Your involvement must be done only under your own name. You must not mislead the public that you are a representative of the Company or that the Company is involved with, interested in, or supportive of any political party, alliance, politically influential figure, or election candidate.

**Case 2**

What should you do if you want to express your support for a political rally that will march past your office?

**Advice**

You can express your support during your break time, and before or after working time. Your participation must not be done in the Company's premise, to prevent the public misunderstanding of the Company. You must not wear the Company's uniform while doing so. It is your responsibility to change your uniform before joining the activity. You must neither use any symbols that represent the Company nor take photos that may contain the Company's symbols and post them on social media or any other media.

## Violation Reporting

Violating or supporting violation of the Code of Conduct may result in disciplinary actions. Not promptly reporting violation that you are aware of may also be considered violating the Code of Conduct. The Company may consider disciplinary actions, termination, and cancellation of employment benefits.

If you notice actual or potential acts that could violate the Code of Conduct, you can report or consult:

**Internal Audit Department**

Tel. 0-2777-8230

E-mail:

auditor@bangkoklife.com

**Compliance Office**

Tel. 0-2777-8861

E-mail:

compliance@bangkoklife.com

**Human Resources Management**

**Department**

Tel. 0-2777-8852

If your report on violation against or non-compliance with the Code of Conduct is not taken care of or involves directors or executives, you can directly report to:

**Chairperson of the Internal Audit Committee**

E-mail: audit\_committee@bangkoklife.com

You can study the details of 'Whistleblowing' and 'Measures to protect providers of useful information' from Whistleblowing Policy. <https://www.bangkoklife.com/en/about/child/65>