

Conflict of Interest Policy – COI

PACIFIC PIPE PUBLIC COMPANY LIMITED AND ITS SUBSIDIARIES (If any)

The Board of Directors	
No. 1	12 November 2018
No. 2	22 December 2022
No. 3	20 December 2023
No. 4	20 December 2024
No. 5	16 December 2025

Note: Approved by the resolution of the Board of Directors' Meeting No. 6/2025, held on 16 December 2025, Agenda Item 4.3.

1. General Provisions

1.1 Objectives

- 1.1.1 To establish a policy framework on conflicts of interest that Pacific Pipe Public Company Limited (the “Company”) shall strictly adhere to in the conduct of its business.
- 1.1.2 To provide the Company with guidelines for requiring employees to disclose activities or relationships that may give rise to actual or perceived conflicts of interest.

1.2 Scope of the Policy

This Policy applies to the Company and its subsidiaries (if any) and shall be used as a guideline for establishing rules and procedures relating to conflicts of interest, unless there are other policies or requirements that are more stringent, comprehensive, and applicable.

1.3 Persons Required to Comply with This Policy

Directors, executives, and employees at all levels of the Company, including any other individuals or juristic persons acting on behalf of or in the name of the Company, such as external parties engaged under temporary or contractual arrangements, shall strictly comply with this Policy.

1.4 Policy Exemptions

None.

1.5 Relevant Rules or Laws

- Policy on Giving and Receiving Gifts and Entertainment
- Code of Ethics and Business Conduct
- Applicable Laws, Rules, or Other Relevant Regulations (if any)

1.6 Effective Date

This Policy shall become effective as of the date of approval by the Board of Directors of Pacific Pipe Public Company Limited.

1.7 Policy Review Frequency

This Policy shall be reviewed annually or when there are significant changes.

2. General Principles

Avoid any actions or conduct that may give rise to a conflict of interest, whether directly or indirectly.

3. Definitions

“Conflict of Interest” means any act or circumstance that may cause a person performing duties in his or her assigned position to carry out actions, make decisions, or approve or authorize matters in a biased or improper manner, deviating from what is appropriate for personal benefit, and resulting in an adverse impact on the interests of the Company.

4. Roles, Duties, and Responsibilities

4.1 Board of Directors

The Board of Directors is responsible for approving this policy and overseeing the management of conflicts of interest.

4.2 Chief Executive Officer (CEO)

- 4.2.1 Ensure effective communication of the Conflict of Interest Policy to all employees.
- 4.2.2 Ensure that appropriate supervision is in place to strictly enforce employees’ compliance with this policy.
- 4.2.3 Monitor compliance with the Conflict of Interest Policy and report the results to the Board of Directors.

4.3 Employees at All Levels

All employees are required to strictly comply with this policy.

In this regard, the Company Secretary is responsible for establishing and/or revising relevant policies, rules, regulations, and/or operating manuals to ensure alignment with the principles set forth in this policy.

5. Guidelines for Practice

- 5.1 Employees shall avoid any actions that may conflict with the Company's interests, whether arising from dealings with the Company's business counterparts such as suppliers, customers, or competitors, or from the use of opportunities or information obtained through employment with the Company for personal gain. This includes engaging in competing businesses or undertaking other employment outside the Company that may adversely affect the performance of duties.
- 5.2 Employees should refrain from holding shares in competing businesses if such shareholding causes, or may cause, the employee to act or omit to act in a manner inconsistent with their duties, or adversely affects job performance. In cases where such shares were acquired prior to employment with the Company, prior to the Company entering into such business, or acquired through inheritance, the employee shall disclose such shareholding to his/her immediate supervisor in accordance with the reporting line.
- 5.3 Employees who have an interest in any matter are prohibited from approving or participating in the approval of any transaction or action undertaken in the name of the Company, in order to prevent conflicts of interest.
- 5.4 Employees may undertake work for subsidiaries (if any) only with approval from management-level supervisors or directors. However, employees shall not accept any external work that competes with the Company's business or gives rise to a conflict of interest, whether on a temporary or permanent basis, unless specific approval has been granted by the relevant supervisor or a director.
- 5.5 In any meeting where an agenda item involves a conflict of interest, the director, executive, or person with such interest shall temporarily leave the meeting to allow other participants to deliberate, analyze, and express opinions independently, free from the influence of the interested person.
- 5.6 The Board of Directors and executives shall carefully consider conflicts of interest relating to connected transactions between the Company and its subsidiaries (if any), or between the Company and its parent company, with honesty, integrity, independence, and reasonable judgment, within the framework of good ethics and in the best interests of the Company.
- 5.7 Directors and executives shall report transactions entered into with related parties that are connected with the management of the Company or its subsidiaries (if any) to the Internal Audit function.

6. Disciplinary Actions

Employees who violate this policy shall be subject to disciplinary action in accordance with the Company's rules and regulations and may also be subject to legal liability, or other applicable laws, rules, or regulatory requirements.

.....(signed).....

(Mr.Kriengkrai Rukkulchon)

Chairman of the Board and

Chairman of the Nomination, Remuneration and Corporate Governance Committee