



บริษัท เชาว์ สตีล อินดัสทรี จำกัด (มหาชน)
Chow Steel Industries Public Company Limited

209/1 อาคารเค. ทาวเวอร์ ชั้น 18, ยูนิต 3 ถนนสุขุมวิท 21 (อโศก) แขวงคลองเตยเหนือ เขตวัฒนา กรุงเทพมหานคร 10110 ประเทศไทย
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Fax : +66 2 260 3100 Registration No.0107552000049

Codes of Conduct

The Board of Chow Steel Industries Company Limited (Public), announced to be a “Company Limited” have set the codes of conduct which will be part of our policy on governance for the company. These policies below will be the guidelines for directors, executives and employees of the company.

1. Social and Environmental Responsibilities
2. Dealing with Clients and Product Responsibilities
3. Compliance with laws and regulations
4. Securities Trading and Inside Information Policy
5. Corporate Opportunity
6. Conflicts of Interest
7. Confidentiality
8. Fair Dealing
9. Protection and proper use of corporate assets
10. Internal Controls and Audits, and Financial Reporting
11. Respect for Human Rights
12. Editing and Cancelling



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1. Social and Environmental Responsibilities

The company within the position of the organization highly aims to increase social responsibilities to maintain stability in the steel industry. We are trying to be responsible in order to create the best benefit for both social and environmental issues.

Guidelines

- Directors, executives, and employees act on their duty with morality, honesty, and transparency.
- Directors, executives, and employees must be aware of the usage of resources to be beneficial, environmental friendly, and avoiding any process that may cause pollution.
- Directors, executives, and employees will be involved in activities that can benefit the society such as education, traditions, and the environment.
- Directors, executives, and employees will be involved in community maintenance including victims from disaster that are unpredictable.



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2. Guidelines for Customer and Product Quality.

The company has high concern with the process of production and distribution of high quality products. Our policy involves best benefit to our customers which has to be under these rules & regulations.

Guidelines

- Directors and employees must understand the process of production and strictly act in the process according to the rules & regulations for time and quality management in distribution.
- Directors and employees must learn and understand customer's demand in order to respond correctly.
- Directors and employees must be polite and humane to customers.
- Directors and employees must respect comments and decisions made by customers.
- Directors and employees must keep all customers' information highly restricted and not to be used for personal benefits and uninvolved individuals.
- Directors and employees must be attentive on customer's request and proceed with moral conduct for rapid response.

3. Guidelines of Laws and regulations

Directors, executives, and employees have the responsibilities according to the laws, regulations, and policies of the company. They also should avoid any act that can have negative affects on the company.

Guidelines

- Directors, executives, and employees have to understand the laws and both internal and external policies of the company.
- Directors, executives, and employees have to act according to the laws and regulations of the Thai stocks market and the SEC.
- Directors, executives, and employees must not act against the law such as misapplied, fraud, bribe, etc.
- In case of directors, executives, and employees acknowledge that involves unethical and unmoral act, must inform immediately to their supervisors.



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4. Buying and Selling Company's Estate and Usage of Internal Information

In the process of buying and selling estate of the company from directors, executives, and employees must act according to the laws, policies, and worker's manual. In addition, Directors, executives, and employees that have access to the company's information must not use them for personal benefits. Inappropriate act may lead to opportunity loss in business's terms and a chance to improve in terms of customer service. This may also affect the estate price of the company. Inappropriate act is stated is against the law.

Definition

Internal Information: information that is restricted from the public which may influence the decision making of stockholders or other criteria which may involve trade of company's estate such as shared transfer documents.

Example of Internal Information: information that is not yet officially announced such as dividend, plans in buying back estate, business turnovers, company merge negotiations, joint venture and negotiation contracts including transactions with other companies that is restricted from the public.

Guidelines

- Directors, executives, and employees have the responsibilities to understand and strictly act according to guidelines of the company.
- Directors, executives, and employees must not expose information about the company to other companies that doesn't have restricted rights in business agreements.
- Negotiations of internal information, directors and executives must be aware of conversations to be overheard or taped. Important conversations should not be discussed in public places such as in a taxi, meeting rooms, show rooms, elevator, restaurant, toilets, and golf club or even via telephone.
- Directors, executives, and employees must avoid using information for personal benefit and uninformed individuals that is related to trading of the company's stocks.
- Directors, executives, and employees should avoid buying and selling company's stocks before broadcasting company's financial statement or company status including other important issues. Directors, executives, and employees should also wait at least one month before publishing the quarterly financial statement and annual financial statement, should at least wait 24 hours after publishing to the public before buying/selling the company's stocks.
- Directors, executives, and employees have the responsibility to protect the use of internal information which is not yet published to the public to be acknowledged only within related individuals.
- Directors, executives, and sales manager/equivalent financial or accounting positions have the responsibility to report changes of company's estate illegally, a copy should also be sent to the company's secretary for notification in every occasion.
- Directors, executives and employees must not use internal information for personal benefits even after resignation from the company.
- Violation of using internal information for personal benefits, the company has set legal punishment which beginning with a warning letter, cutting wages, job suspension without receiving wages, or sacking from work. These punishments will be considered from intension or seriousness of fault.

5. Business Opportunities

Directors, executives, and employees have the responsibility to support that will lead to best interest that is legal according to favorable opportunities. In addition, such individual shouldn't use company's assets, information, received positions for personal benefits.

Guidelines

- Executives and employees should suggest various products to customers in order to gain business opportunities for the company.
- Executives and employees should avoid consensual behavior to partners, competitors or customers that may lead to opportunity loss of the company.
- Directors, executives, and employees should avoid behaviors that will obstruct or reduce company's business opportunities.
- Directors, executives, and related employees is prohibit from events which may lead to obstruction or reduction of company's business opportunities.

6. Conflicts of Interest

Directors, executives, and employees should not behave in terms that can be conflicting with the company's interest covering personal benefits.

Guidelines

- Directors, executives, and employees do not take any actions that will compete with the company.
- Directors, executives, and employees should take actions that can lead to maximum benefits for the company without the influence of personal needs either by descendant or elsewhere, usage of fair value equivalent to transaction with external individuals. If there is any conflict of interest, employees should report to subordinates in writing for further consideration.
- Directors, executives, and employees not cleared about their objectives that relate to conflicts of interest should report immediately to their subordinates attached with list of details.
- Directors, executives, and employees including relatives should avoid being related to financial issues and interaction with external individuals which may lead to loss of company's benefits or conflicts of interest.
- Directors, executives, and employees should avoid receiving gifts or remuneration from involved business individuals which may lead to unfair decision making.
- Improper gifts or remuneration should be returned immediately, in case unable to return employees must transfer those gifts to the company in order to maximize company's benefits.
- Directors, executives, and employees must act according to rules & regulations of "The Stocks Exchange of Thailand" and "Public Company Act."

7. Protection of Confidential Information

Directors, executives, and employees must protect confidential information acquired, especially information that may influence stakeholders unless publication is officially authorized from the company or subordinates.

Guidelines

- Directors, executives, and employees have the responsibility to protect confidential information such as trading, production formulas, costs, partners, etc.; unrestricted to unrelated individuals who may affect the company unless obtaining written allowance from subordinate.
- Directors, executives, and employees must not use company's confidential information for personal or related benefits.
- Supervision of company's confidential information and conversation must be done with cautious. Neglecting of confidential information and conversation may lead to publication to others.
- Directors, executives, and employees must not reveal company's information even after resignation from the company.
- Publication of company's information to the public in the form of printing media, statement, and interviews; directors, executives, and employees must be done according to the company's guidelines.

8. Fairness to Partners

The company's fairness policy in the process of business transactions is making an effort to bring fairness among partners and competitors including strictly keeping contract to coexist in reaching objectives.

Guidelines

- In case partner companies are related with directors, executives, and employees which may lead to unfairness. Related individuals must report to subordinate in written report before making transaction.
- Executives and employees must act according to the conditions made with partner companies with fairness. In case unable to perform according to such condition reports must be made to subordinates to find appropriate solutions.
- Directors, executives, and employees are prohibited to offer assets or interest to external individuals who may lead to business unfairness including avoidance of receiving assets or benefits from partners.

9. Appropriate Use of Company's Assets

Company's assets should be used legally. Directors, executives, and employees should take care of company's assets making sure to be used efficiently.

Guidelines

- Executives and employees must carefully use equipments for safeties throughout using company's assets conservatively at most beneficial.
- Executives and employees must not intentionally destroy company's assets and should take care of the assets to be in good condition for long term benefits.
- Directors, executives, and employees must not search for personal or unrelated individuals' benefits from company's assets from using equipments for personal issues including selling and pawning regardless the equipments are in any condition.
- Purchasing, storing, selling, and transferring assets; employees have the responsibility to act according to company's policy.

10. Internal Audit, Internal Control System, and Financial Report

Company has set a good internal audit and internal control system consistent to international standards which have effective follow-up system. Company has also conduct appropriate risk management, complete financial and accounting, and performing according to the rules & regulations.

Guidelines

- Directors, executives, and employees is aware of the importance of risk management and act strictly according to the risk management policy comprise of reporting risk that may occur with the company to subordinates.
- Company's directors have the responsibility to set up an audit system for internal audit and internal control to make sure the company is performing legally and according to the policy under verification of the audit directors.
- Audit directors has the responsibility to make financial report correctly, completely, and on the right time including annual and quarter statement which meets the standard of Certified General Accountant.
- Directors, executives, and employees have the responsibility to strictly and continuously perform under the policy of their duties including report to subordinates of policy violation.
- The audit department has the responsibility to track and evaluate the performance of executives and employees with the cooperation of the internal audit committee to provide unconcealed documents and proofs involved with the investigation.
- Directors, executives, and employees offer comments to improve internal system according to the situation, environment, and other external factors.

11. Adherence to human rights and equivalence of job opportunities

The company has the policy to adhere human rights and to pay respect to personal rights of directors, executives, and employees. Company is open to equal rights for job opportunities and will not permit labor discrimination including of violation and threatening between different nationalities, race, class, sex, age, religious, beliefs, and social status.

Executives and employees have the opportunity to get support for training to have knowledge improvement in order to meet the standards of each level of duty.

The company has the policy to care for the working environment to be safe and secure, sanitary, and conducive to work efficiency.

Guidelines

- Directors, executives, and employees have respect to each other in terms of personal rights.
- Directors, executives and employees have equal respect without discrimination even with differences of nationality, race, class, sex, age, religious, beliefs, and social status.
- Directors, executives, and employees should respect both Thai and other countries' traditions and cultures appropriate to the social and economy of certain countries.
- In case of any unusual circumstances which can affect the company's safety; executives and employees should notify responsible agencies to adjust immediately.



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12. Editing and Cancellation

The company has the responsibility to adjust and improve information in the codes of conduct to be consistent with the law, related policy, and business environment.

The codes of conduct mentioned may not cover for every circumstance. Employees can discuss problems with their subordinates. In case of conflict, the executive's decision is final.