

The Company's Code of Conduct for the Executives and
Employees

Leo Global Logistics Public Company Limited

The Company's Code of Conduct for the Executives and Employees

Scope of Enforcement

This Code of Conduct is imposed on all of the Executives and Employees working with Leo Global Public Company Limited (“**The Company**”) as well as its Subsidiaries.

“Executives” refer to the Chief Executive Officer (CEO) and the managerial staff second from the CEO down to the Vice President.

“Employees” refer to those who work for the Company in the positions lower than Vice President, be it full-time employees, temporary employees and those working under special contracts.

Code of Conduct

1. Policy on Conflicts of Interests

1.1 Executives

After registration with the SET and conversion into a public limited company, the Company shall act in compliance with the regulations of the Stock Exchange of Thailand; thus, the Executives need to take into accounts the conflicts of interests with regard to Related Parties Transactions between the Company and its Subsidiaries in an honest, reasonable and independent way and under a good ethical framework by putting the Company's benefit in the first priority to make sure they are reasonable transactions made with the intention to mainly benefit the Company.

1.2 Employees

1.2.1 The Employees are also advised to avoid any actions deemed likely to have conflicts of interests with the Company whether they are caused by making business-related contacts with persons such as business partners, customers, competitors, or by making use of chances or information derived from business contacts, or even by starting a business in competition with the Company.

1.2.2 They must not work for any other persons or organizations in return for benefits during the Company's working hours except that they are permitted in writing by the CEO or any person authorized by the CEO.

1.2.3 They must keep the Company's benefits at full capacity.

1.2.4 They must not perform any other things in ways that are counted as conflicts of interests with the Company whether directly or indirectly.

1.2.5 They must not get involved in any other business operations deemed likely to affect the Company's benefits or to compete with it.

2. Policy on maintaining and using the Company's assets and information/secret

2.1 All methods, procedures, ideas including technical knowledge or knowledge and/or any other technical methodologies connected to the Company's businesses or executions resulting from creativities, researches, studies and/or any other actions in relation to the performance of duties and in accordance with the Executives and Employees' Employment Contracts in all cases shall be all counted as the Company's Intellectual Properties whether they were registered in accordance with

the law on Intellectual Property or not. As a result, it is prohibited to further reveal without permission in writing from the CEO or his authorized person.

- 2.2 During the period of employment and within a period of one year from the termination date of employment, provided that any Executives or Employees have accesses to the Company's lists of data counted as "Trade Secret", such Executives or Employees agree to keep confidential the "Trade Secret" of the Company they have recognized or gotten to know by accident or were received in between their work services at the Company. They are not permitted to deliver it to any receivers or make copies without permission; this includes not making it public and/or not performing or refraining from any actions that lead to damages to the Company's reputation or its business. In addition, they are also not permitted to be hired or become an executive or employee or provide consultation or support or enter into any contracts with any juristic persons or companies viewed as the Company's business competitor or as sharing the same nature of business with it.

For the benefit of the interpretation of this requirement, "Trade Secret" refers to the trade information that has not yet been generally known or has not yet been available in the group of individuals normally supposed to be involved with one and is commercially useful. Since it is confidential, the Company has used appropriate measures to keep it secret. Nevertheless, it shall likely be included in any guidelines, contracts or agreements the Company has already imposed and shall later impose or in accordance with Trade Secret Act B.E. 2545 (including any amendments).

- 2.3 The Executives or Employees must not work for any other persons or organizations in return for benefits during the Company's working hours except that they are permitted in writing by the CEO or any person authorized by the CEO.
- 2.4 The Executives or Employees must not perform any other actions in ways that are counted as conflicts of interests with the Company whether directly or indirectly and whether by themselves or by co-operating with others.
- 2.5 The Executives or Employees must not use the Company's Internet Property in other commercial purposes or for personal benefits except for the Company's benefit.
- 2.6 The Executives or Employees must abide by and seriously comply with the Company's Policy on Information Technology. For example, they:
- must not invade others' privacy regardless of any case
 - must not make use of the Company's confidential data except for the use in specific part by those who are directly responsible.

- must abide by the rules and regulations for use of equipment and tools in the computer system.
 - must not invade into other users' files and documents without permission.
- 2.7 The Executives or Employees must be aware of and comply with the guidelines for uses of the Computer Network System in an accurate and appropriate manner.
- 2.8 Never install or record any software in the Company's Computer System without permission.
- 2.9 Never pass the Company's software to any other persons including the Company's business partners, contract parties and customers or personally install the software. This also includes the use of the staff's internet or connecting the internet system to transfer data, publicizing pornographic materials, sending and receiving messages through the Internet System (e-mail) that violates the law or the law on copyrights and that are contrary to the intention or purposes of policies or regulations or the Policy Guidelines on the Company's Information System or violates The Computer-related Crime Act B.E. 2550 (including any amendments).
- 2.10 During the provision of work services under the Employment Contract, the Executives or the Employees must not perform any actions and/or refrain or abstain from any actions deemed to cause damages as a result of information, news and/or reports or records or communications that are false or inaccurate in one way or another and on purpose.
- 2.11 The Executives or Employees must not violate the copyrights of the Company and/or those of other Companies that permit the Company to make use of their computer programs, whether it be under contracts and/or any methods and/or whether it be duplication or modification, publicization, renting the manuscripts or copies whether to make profits or not. In case, any Executives or Employees violate this Code of Conduct, the Company is entitled to immediately terminate the Employment Contract.
- 2.12 The Executives or Employees must use the Company's assets in a responsible and careful way and take good care of tools and supplies received from the Company to always be in good conditions and repair them when they are broken.
- 2.13 The Executives or Employees must not violate the Company's regulations and orders against actions that may cause accidents or damages to the Company's assets.
- 2.14 The Executives or Employees must maintain the Company's assets in order not to lose them or allow them to be damaged even if this is not their direct responsibilities.

- 2.15 The Executives or Employees must not use the Company's assets and equipment for purposes not relevant to the provision of work services to the Company.
- 2.16 The Executives or Employees must keep secret the confidential information for the companies of its customers, contract parties or business partners or any other persons.
- 2.17 The Executives or Employees must not reveal the confidential information and documents or Trade Secret for another year from the date when their tenure terminates.
- 2.18 The Executives or Employees must be aware of the steps and methods to secure the secret information and follow them to protect the secret information from leaking out unintentionally.
- 2.19 The CEO shall be one who approve the publicization of information.

3. Policy on giving and receiving gifts or entertainments

- 3.1 The Executives or Employees are not supposed to request for, receive or consent to receive financial benefits or any other benefits from the business-related persons.
- 3.2 The Executives or Employees may traditionally give or receive gifts as long as it does not result in any of the receivers' business decisions.
- 3.3 In case the Executives or Employees receive gifts on traditional occasions that are valued beyond the norm from any persons related to the Company's business, they are required to report that to their immediate bosses.

4. Policy on Purchase and Sales of Securities and Internal Use of Information

- 4.1 The Directors or Executives have a duty to report their Securities holdings in compliance with the rules and regulations of the Stock Exchange of Thailand and the Securities and Exchange Commission.
- 4.2 The Company, its Subsidiaries and Associated Companies that have already become listed companies in the Stock Exchange of Thailand are required to comply with the law on use of Internal Information, and this will be based on the equality and impartiality to each of the Shareholders. Also, to protect the Employees of all levels and their families (who know or might know the internal information that has not yet been publicly revealed) from violations of law, the Company, therefore, prohibits such persons from buying/selling the shares or suggesting that other persons buy or sell or offer to buy or sell the Shares of the Companies, its Subsidiaries and/or Associated Companies registered in the Stock Exchange of Thailand whether by themselves or through brokers while still possessing the data that has not yet been revealed to the public. In this, the Company and the Stock Exchange of Thailand deem buying/selling Securities that way to be one for a speculation and one for creating an advantage for a specific group of persons (Please consider additional details of the Company's Policy on Use of Inside Information).
- 4.3 The Company has set up a security system in the workplace to protect some data files and confidential documents and has also put a limit on access to the data not revealed to the public, with an exception to those involved and in the amount as deemed necessary. It is therefore a duty of the owner or possessor of such unrevealed data to reiterate all those involved to seriously comply with the security process; however, those who break the regulation on the use of Internal Data will face disciplinary or legal punishment (depending on the case).

5. Policy on Internal Controlling and Auditing Systems and Accounting and Financial Reporting

5.1 Policy on Internal Controlling and Auditing Systems

Provide effective internal controlling and auditing systems under the Internal Auditor's verification and also the Audit Committee's review.

5.2 Policy on Accounting and Financial Reporting

The Company's Management takes the responsibility to make accurate, complete and timely financial reports, both for yearly and quarterly budgets, according to an accredited Accounting Standard.

5.2.1 The Accuracy of Transaction Records

- All types of the Company's business transaction records will be made in an accurate and complete way and will be verifiable without any limitations and exceptions.
- Making accounting lists and recording transactions will be based on facts not distorting or creating false lists for whatever objective.
- The Employees of all levels will make their business transactions in conformity with and according to the Company's regulations and guidelines with complete referential documents and with detailed information provided in sufficient and timely manner to enable those responsible for recording, making, and evaluating the financial and accounting reports to make and record all types of financial and accounting lists into the Company's Accounting System with accurate and complete details.

5.2.2 Financial and Accounting Reports

- All Executives or Employees must not distort, cover any data or create false transactions whether it be business-transaction data related to accounting and finance or operational transaction data.
- All Executives or Employees should realize that the accuracy of the financial and accounting reports falls within the shared responsibilities between the Company's Board of Directors, the Executives and the responsible Employees.
- All Executives or Employees share a duty to make, prepare and/or give the business transaction data.

5.2.3 Best Practice in Complying with Laws

- All Employees involved must comply with rules and regulations stipulated in accordance with applicable laws both in the country and/or outside of it to help make the accountancy and financial records proceed in an accurate and complete way.
- The Employees of all levels must abide by honesty without bias and also upright in keeping records.

6. Policy on Responsibilities to Shareholders

- Perform duties with honesty and trustworthiness and carry out any actions to Shareholders with fairness.
- Report the organizational status to Shareholders in a constant, complete and factual way.
- Report the organization's future trends to Shareholders, both on positive and negative sides with enough supporting reasons.

7. Policy on Treatment to Executives or Employees

- Provide the Executives as well as the Employees with fair payoffs.
- Maintain a good working environment for the safety of life and property of the Executives or Employees.
- Appointing and transferring staff including rewarding and punishment must be performed with trustworthiness and based on knowledge, abilities, and appropriateness to such target positions of the Executives and Employees.
- Put the emphasis on the development of the Employees' knowledge, abilities and skills with constant and comprehensive opportunities.
- Seriously comply with laws and regulations related to Executives or Employees.

8. Policy on the Demeanor of the Executives or Employees

- Always perform one's duties with earnestness, upright and transparency.
- Always refrain from giving gifts to the supervisor or receiving ones from the subordinates.

- Respect the rights of other Executives or Employees.
- The Supervisors are advised to behave in a respectful way and the Employees are not advised to perform any actions viewed as disrespectful to their Supervisors.
- Always be a disciplined person and comply with the organization's rules and regulations and beautiful tradition whether indicated in writing or not.
- Co-establish and maintain harmonious atmosphere and unity among employees and always avoid any actions that affect the Company's image and reputation or create negative consequences.

Tracing and Providing Instructions for Compliance with the Code of Conduct

- 1) In case of finding violations of laws, guidelines, regulations, ethics or the Company's applicable policies, or any consent to such violations given to any subordinate, the Executives or Employees are required to report them directly to the Human Resources Division who will later take steps in the defined process according to the policy and working guidelines related to such matters.
- 2) The Company shall review its Business Code of Conduct at two-year intervals to keep it appropriate to the changing business environments and circumstances.

This edition of the Company's Business Code of Conduct shall take effect from November 8, 2016.

-Signature-

(Mr. Sanee Dangwung)

Chairman of the Board of Directors

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