

noble

Code of Conduct

Revised: 2024

Message from Chairwoman

Throughout the period of business operation, Noble Development Public Company Limited has been determined to grow based on moral and ethical basis as well as Corporate Social Responsibility, which it is not only creating sustainability of value added to shareholders, but it is also paying attention to all groups of stakeholders, as well as being responsible for balanced development of the economic, society and environment. The Company believes that ethics is important tool enhancing transparency of operation, confidence among investors or all related parties, as well as resulting in performance of directors, executives and employees to be in line with good ethics.

Conforming to Good Corporate Governance policy, the Board of Directors has made the handbook of Code of Conduct and Practice for entire levels of directors, managements, and employees to access to standard of ethics applied by the Company. The handbook will be regularly reviewed every two years or annually if there is a significant change arises so as to modify the code to effectively cover and conform to directions adopted by the Stock Exchange of Thailand and other relevant agencies, as well as keeping pace with dynamism of business situation and according to the policy and guideline against corruption has determined by the Company.

The Company really hopes that all levels of directors, managements and employees strictly comply with this business ethics.



(Ms. Punnee Chaiyakul)

Chairwoman of the Board of Directors

Noble Development Public Company Limited

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1. Vision and Mission

1.1 Vision

We do not build houses, we create homes. We set the new paradigm in property development, with our goal to enhance the living experience of each individual who become our clients. We will be uniquely modern and iconic, go above and beyond our boundary to reach the exciting new world, and always keep reinventing ourselves to make the world a better place than it was yesterday.

1.2 Mission

- We develop our residential projects from affordable to high- end, we will expand internationally.
- We surprise our clients with unexpected design and uniqueness with the highest quality that bring them a sense of pride to be proud member of noble community.
- We treat and take care of our employees as our own family. We listen to their voice and ideas. We empower them to be both outstanding team leader and strongest team player. They will be incentivized as they are also Noble's owners.
- We deal with our stakeholders with fairness and openness. We also conduct ourselves with best practice of corporate governance and social responsibility.

2. Set of Rules

2.1 Policy on conflicts of interest prevention

The Company specifies policy to monitor items which may cause conflict of interest, from operations and taking up positions of entire directors, management and employees, who take personal vested interests. The guidelines are summarized below:

- 2.1.1 Avoid the self-connected transaction that may raise the issue of conflict of interest with the Company.
- 2.1.2 In necessity case for the benefit of the Company, the transaction per se must be done as if it is the typical business practice. However, the transaction must be approved by non-stakeholders in that transaction.

- 2.1.3 Directors, Management and employees are prohibited from taking advantage of the opportunity given or information derived from the Company to gain personal interest or compete with the Company itself.

2.2 Policy on secure and utilize the Company's assets

The Company encourages entire directors, Management, and employees to effectively and fully use the Company's resources and assets to enhance competitiveness and offering good service to customers. The regulations are as follow:

- 2.2.1 Directors, Management and employees have duties and responsibilities to protect the Company's assets not to discredit, loss and use assets effectively to fully benefit and not use the Company's assets for personal interests which means both tangible and intangible assets such as property, technology, academic knowledge, patent, copyright including the secret of information that undisclosed to public such as business plan, financial budget and human's information.
- 2.2.2 Not use the company's inside information has not been disclose to public for personal gain allowed.

2.3 Policy on use of computer and information technology

The Company is committed to providing modern information technology systems, standardized, and secure business as a guideline for the operation of the executives and all employees. It also aims to promote, develop the employee's knowledge, and competency in the field of Information technology to enable them to work efficiently. The regulations are as follow:

- 2.3.1 Use computer and information technology in related work according to Computer-Related Crime Act B.E. 2550 (2007).
- 2.3.2 Computer, information technology and all system network are the Company's assets. Employees shall not use them for their own interest.
- 2.3.3 Employees must not change, duplicate, erase, dispose, forward the computer's data without prior permission.
- 2.3.4 Disclosure of data in the Computer's system network or data bought by the Company is prohibited without prior permission.
- 2.3.5 Employees shall keep username and password for personal use without sharing them with other parties, nor publicize, distribute or let known the matter to other parties.

- 2.3.6 Employees shall use internet to work only and try to avoid the unfamiliar, unlawful, and immoral website. They are also prohibited from using website that may cause damage to the computer and the Company's network.
- 2.3.7 Employees are prohibited from forwarding email relating to threat, sexual harassment, non-decency subject matter, privacy violation and the like.
- 2.3.8 Employees must not use the Company's computer and network to download non-work related files.
- 2.3.9 Any software programmes which are not installed by the Company are prohibited.
- 2.3.10 Changing or installing or removal any hardware, except standard hardware installed by the Company, is not allowed.

2.4 Policy on intellectual property and copyrights

The Company encourages all employees to provide public relations media or paperwork for being publicized within and outside the Company and provide computer programmes to be used at work in the Company to smooth out operation and maximum benefit to the Company. The regulations are as follow:

- 2.4.1 Any reward and copyrights received from the assignment or work given by the Company or any by product assignment or work that originated or resulted from training or tutoring by the Company, must belong to the Company.
- 2.4.2 Any reward and copyrights received from the press release, paperwork, artwork, book given by the Company or any by-product as such that originated or result from training or tutoring by the Company, must belong to the Company.
- 2.4.3 Employees shall not use pirate computer software and prohibit from installing illegal software. And they are prohibited from installing illegal computer software in the office.
- 2.4.4 Employees shall not encourage the use of any product that violates intellectual property and copyrights.
- 2.4.5 The Company hereby discourages management and employee in use of pirate software and other products that violate intellectual property and copyrights.

2.5 Policy and guideline for Offering and Accepting of Gifts, Hospitality, or Other Similar Forms

The Company has determine the policy and guideline for offering and acception of gifts, hospitality, or other similar forms for all employees to benefit operation and credibility to the Company. The regulations are as follow:

- 2.5.1 On common decency and good traditionally ground, employees are allowed to offer gift to other parties, if that gift does not affect the business decision making.
- 2.5.2 Gift offering should be worth not much, or not exceeding Baht 3,000. And it should not be cash or cash equivalent gift.
- 2.5.3 In case of received the gifts on traditional occasions undeniably, must comply with guidelines for offering and accepting of gifts, hospitality, or other similar forms of rewards.
- 2.5.4 Giving or taking gift shall be transparently and openly done and in compliance with the Company policy and guidelines.

2.6 Policy on anti-corruption and bribery

The Company realizes importance of undertaking business with honest and being ethical with seriously paying attention to anti-corruption practice. The Company has a corruption risk assessment process and has determined policy and guideline against corruption throughout not encouraging directors, executives and employees of all levels to giving or receiving a bribery. The regulations are as follow:

- 2.6.1 Must not initiate or request money, gift and other forms, to any related parties.
- 2.6.2 Must not offer money or other kinds of benefit to government officers, clients, suppliers, competitors and other related parties to involve in illegal activities.
- 2.6.3 Money borrowing or soliciting form the Company's customers or trading partners is prohibited, except borrowing money from bans or financial institutions as their customers.
- 2.6.4 Perform duty responsibly in supervising use of the Company's assets to ensure for their maximum benefit. Personal use or other people's use is prohibited.
- 2.6.5 No discrimination against customers be done.

- 2.6.6 Avoid any financial engagement or relationship with external parties. When it is necessary to decide or approval an item with potential conflict of interest, they must report to the Company and withdrawing from any involvement in such item.
- 2.6.7 The Company has set up a central agency which is responsible for monitoring and evaluation including sanctions for violations or non-compliance with such policies and guidelines.

2.7 Policy and guideline for whistleblowing and protection of informants

The Company provides policy and guideline for whistleblowing and protection of informants to enhance confidence for all stakeholders, employees, or whistle blowers to file grievances for their being unfairly treated by the Company, or experiencing unlawful or unethical acts, or employees being defamed, threatened, unfairly taken criminal action, or being discriminated in connection with employment through specifying practices as follow:

- 2.7.1 The Company has set up central agency as center receiving information from all stakeholders submitting reports or grievances in connection with potential damages to the Company and their rights being defiled through the Company's website www.noblehome.com with contact information to all stakeholders or such grievances. The information will then being forwarded to the Company's Audit Committee.
- 2.7.2 The Company has set up central agency as center receiving information or grievances relating to employees or whistle blowers being unfairly treated by the Company through the Company's website. The information will then be forwarded to Board of Directors and management in appropriate duration.
- 2.7.3 Board of Directors and management investigate the cases for proper solutions.
- 2.7.4 Periodically monitor progress of the cases and notify the results to parties filing grievances.
- 2.7.5 The Company will keep information of parties filing grievances confidential without disclosing their names, addresses or any other related information.

2.8 Policy on monitoring the utilization of internal information

The Information Disclosure Policy is determined by the Company in order to supervise directors, executives, and employees in order to maintain confidentiality and avoid the abuse of the Company's internal information for personal benefit including engaging in any transaction of the Company shares within one month before the financial statements are disclosed to the public, that may affect the securities' trading prices, as follows:

- 2.8.1 The company prohibits directors and executive including their spouses and dependents from abusing the unpublicized internal information for their personal benefits.
- 2.8.2 The Board of Directors and executives have the duty to submit the report on any changed regarding their securities holding to the company, SET and SEC. The company also informed its executives of their duties and obligations in preparing such report and disclosure of securities holding, including the stipulations on penalties in Article 275 of the Securities and Exchange Act B.E.2535 (A.D.1992), which are maximum 500,000 Baht fine and maximum 10,000 Baht fine per day until the report in question has been filed. They must as well report same matter to the company in the same day.
- 2.8.3 The executives will be punished if they use the internal information for their personal benefits.
- 2.8.4 According to Article 59 of Securities and Exchange Act B.E.2535 (A.D.1992), the executives must report any change regarding their securities holding, SET and SEC. They must as well report same matter to the company in the same day.

2.9 Policy on Report on Interest of Directors and Executives

In compliance with section 89/14 of Securities and Exchange Act (No.4) B.E. 2551 (2008) and the Notification of the Capital Market Supervisory Board No. TorChor. 2/2552 Re : Report on Interest of Directors, Executives and Related Persons which stipulates, set requirement that the directors and executives report to the company on their own stake, or those of their related person's vested interest relating to the management of business of the company or its subsidiaries. Such report shall constitute information to support the company's operations according to the requirement regarding related party transaction, which are transactions that may cause conflict of interest and lead to the siphoning of interest of the company and its subsidiaries. The directors and executives must also perform their duties with due care and honesty, and they shall make decision on the company's matters without vested interest either directly or indirectly by filling in Form for Reporting on Stake of Directors and Executives as follows:

- The first report: It must be completed within 15 days after becoming a director or executive of the Company.
- Report on changes to relevant information: It must be sent within 3 business days of the day the relevant information changed, and it must include the sequential number of the modification.

As a result, the Company Secretary will collect reports from each director and provide copies to the Chairman of the Board and the Chairman of the Audit Committee within 7 business days of receiving those reports.

2.10 Policy on internal control, internal audit, and financial statement

The Company specifies policy on internal control, internal audit and financial statement to ensure that it has abided by standards of related laws. The regulations are as follow:

- 2.10.1 The Company's Management is responsible for preparing quarterly and annually financial statements with accuracy, adequacy and timeliness must be attained. Also, the financial statements per se must conform to financial reporting standard and relate regulation.
- 2.10.2 Set up the effective internal control and audit system under the assessment and monitoring from internal auditor and the Audit Committee.

2.11 Policy over shareholder rights

The Company is determined to increase value in long term for continuously good return to shareholders, based on business operation with honest and equal treatment to every shareholder. The regulations are as follow:

- 2.11.1 Treat every shareholder equally.
- 2.11.2 Operate with caution and honesty that will lead to maximum value to shareholders.
- 2.11.3 Disseminate news and information through Company's website www.noblehome.com
- 2.11.4 Provide adequate, accurate and timely financial statements.

2.12 Policy over customer care and quality product

In operating business, the Company is aimed at creating maximum satisfaction and good relationship with customers, which will result in the Company's success. The regulations are as follow:

- 2.12.1 Treat customers equally and fairly, holding on mutual benefit for both parties.
- 2.12.2 Agency of Aftersale service to maintain good environment and repair and maintenance services of customers' houses in the Company's projects are available.
- 2.12.3 Provide suggestion to customers of efficient method on buying products to maximize their satisfaction.

- 2.12.4 Provide accurate and sufficient information to customers to let them know about period, conditions, rights and obligations without exaggeration which may cause customers to misunderstand on quality and quality of the product and any other conditions.
- 2.12.5 Keep customers' secret without misuse the secret to benefit employees or related parties.
- 2.12.6 Contact customers politely and fast and efficient respond to their need.
- 2.12.7 Rapid respond to customers' demand and provide the effective system or channel for customers to file complaints regarding quality of products and service.

2.13 Policy on how to treat business partner

The Company specifies business partners' selection policy with fairness and transparency, strictly complies with terms of trade, as well as provides products by taking into account the Company's maximum benefit. Both parties receive fair return by specifying requirements as follow:

- 2.13.1 Treat business partners based on equality basis and fair return to both parties.
- 2.13.2 Have criteria for selecting and assessing business partners and procure construction materials from business partners at level equally along with preparing contracts by mutual agreement with consideration given to corporate social and environmental responsibility.
- 2.13.3 Consider problems faced by contractors for regular joint solutions to the problems. For example, normally, the company hires contractors with lump sum wages and construction material costs. However, if shortage of construction materials exists, and the company has better bargaining power, the company will help providing the construction materials for mutual support so as to create maximum benefits to running business jointly between the company and its trading partners.
- 2.13.4 Set up the compliance system to ensure the contract's conformity and to protect fraud and misconduct.
- 2.13.5 Aimed at sustainably developing and keeping relationship with business partners.
- 2.13.6 The company does not initiate or request any kind of unfaithful benefit to business partners.

2.14 Policy on how to treat creditor

The Company implements a strict policy paying attention to all types of creditors in accordance with available conditions. Loan's management, debtors' abiding by loan's conditions in accordance with term loan, as well as controlling loans and interest rates payable to all types of creditors as follow:

- 2.14.1 Treat business creditor based on equality basis and fair return to both parties.
- 2.14.2 Strictly comply with agreements or conditions towards creditors', in terms of money payment and any other conditions. If any party cannot comply with terms of the agreement, the parties will jointly seek solutions and prevent damages from occurring.
- 2.14.3 Concentrate on company's management to create confidence to creditors towards the Company's financial position and debt repayment.
- 2.14.4 Set up the compliance system to ensure the contract's conformity and to protect fraud and misconduct.
- 2.14.5 Fully disclose information to creditors without distorting fact or amending any documents to benefit debtors.
- 2.14.6 Aimed at sustainably developing and keeping relationship with creditor.
- 2.14.7 The Company does not initiate or request any kind of unfaithful benefit to creditor.

2.15 Policy over competition

The Company specifies policy on treatment with competitor under framework of law on principle of practice of trade competition without violating competitor's trade secret through fraud. The regulations are as follow:

- 2.15.1 Supporting free trade and do not force a partner to solely trade with the Company.
- 2.15.2 Operating under the rules of the competition.
- 2.15.3 No inquiring confidential information of the competitors by dishonest or inappropriate method.
- 2.15.4 No destructing the reputation of competitors with malicious accusation.

2.16 Policy over employees care

The Company recognizes the importance of employees at every level as valuable and important human resources. Therefore, the Company specified a policy to treat employees at every level equally without discrimination as follows:

- 2.16.1 Treat every employee with respect and dignity according to human rights principles and policies.
- 2.16.2 Assign human resources to their positions based on knowledge and ability, without bias, such as competence, experience, and other necessary requirements, without limitation on sex, nationality, and religion.
- 2.16.3 Provide fair compensation for employees.
- 2.16.4 Employee's promotion, transferring, rewarding, and punishment shall be fair and based on their competency.
- 2.16.5 Communicate the organizations practice guidelines clearly to create a single standard.
- 2.16.6 Provide employee training and develop employees' knowledge and capabilities continually to enable employees to grow with the organization effectively and prepare employees with knowledge, skills and capabilities consistent with the organization's succession plan.
- 2.16.7 Facilitate the window of opportunity for enquiry, feedback, and complain from employees. And all of these must be appropriately addressed to obtain the optimal solution for everyone involved.
- 2.16.8 Accept complaints from employees of every level equitably by providing channels for employees to report complaints to the company such as by reporting inappropriate conduct according to business ethics, behaviors indicative of violations of work rules, regulations, specifications, directives, notifications or laws and protect employees from being bullied or punished by the aforementioned complaints.
- 2.16.9 Provide a labor relations unit responsible for preparing work plans, monitoring, controlling and assessing results from labor relations activities by coordinating with the organizations involved.
- 2.16.10 Follow provisions in labor laws, Thai labor standards and other regulations concerned with labor.
- 2.16.11 Support employees to have quality of life at work, safety for life and properties including good occupational hygiene.

- 2.16.12 Have a consistent performance assessment system in the entire organization reflecting work capabilities and efficiency with fairness.

2.17 Policy on employee behavior

The Company specifies policy of employee behavior so that to let them to be careful in behaving themselves and their treatment to their colleagues as well as preventing them from defying rules and regulations at work. The regulations are as follow:

- 2.17.1 Employees serve the Company with integrity and keen effort.
- 2.17.2 Prevent giving and taking gift to and from superior.
- 2.17.3 Respect co-worker and management.
- 2.17.4 Superintendents shall behave themselves in respectable way. On the other hand, subordinates shall not speak or behave or react in a way that shows lack of respect for supervisors.
- 2.17.5 Be disciplined, abide by organization rules, regulations and common decency.
- 2.17.6 Promote the unity spirit within organization and try to avoid the wrong-doing that may result in adverse consequence/bad reputation of the Company.

2.18 Policy on educating and training employees in environmental matters

The Company provides training and encouraging entire employees to preserve environment. The regulations are as follow:

- 2.18.1 Educate and train employees to understand the value of natural resources.
- 2.18.2 Constantly cultivate an awareness of environmental responsibility in the Company and among workforce.
- 2.18.3 Continuously support employees' activities performing environmental responsibility, including reduction of energy and natural resources consumption.
- 2.18.4 Promote resources' preservation efficiently.

2.19 Policy on being lawful and human rights

The Company respects the rights and freedom of everybody. As a result, it specifies policy on being lawful and human rights to be principle for all employees' practice as follow:

- 2.19.1 Comply with international human rights regulations strictly.
- 2.19.2 Define regulatory measures to prevent the Company's business to be involved in human rights abuses.
- 2.19.3 Not support activities that violate the international law and human rights.
- 2.19.4 Provide an understanding of the international human rights for management and employees of the Company.

2.20 Policy on political preference

The Company supports all employees to exercise their rights as good citizens lawfully. But they are not allowed to participate in any activities which may result in the Company's being misunderstood that it supports political parties, political groups or politicians. The regulations are as follow:

- 2.20.1 Employees shall be law abiding by citizen and exercise their own political rights according to constitutional law and other related laws.
- 2.20.2 Employees have the rights to participate political activity under their own names after working hours.
- 2.20.3 Employees are prohibited from using their authorized power to force or manipulate their colleagues and subordinates to support any particular political groups, directly or indirectly.
- 2.20.4 Employees shall not use the Company's resources and reputation to take side or to grant direct or indirect support any political group. The Company does not allow any political group to use any resources, areas, and other facilities of the Company to organize political activities.

2.21 Policy on safety, occupational health, and environment

The Company is determined to develop business to grow under responsibility to environment. The Company, hence, strictly pays attention to practice according to environmental policy. The regulations are as follow:

- 2.21.1 The Company shall conform to laws and regulations in regard to safety, occupational health, and environment.
- 2.21.2 The Company shall create a decent working environment by enhancing safety to life and personal property of employees.

- 2.21.3 The Company shall a preventive system, and try, on the best effort basis, to control all the damage that may be caused by accident or operational malfunction.
- 2.21.4 The Company shall launch the intra communication to build knowledge and understanding about policy/procedure/precaution on safety, occupational health, and environment to management, employees and other related parties, in order to avoid harmful operating result.
- 2.21.5 The Company shall pursue social responsibility regarding safety, occupational health and environment. The Company shall make a good use of natural resource in a non-harmful way to every stakeholder. The Company will continuously support the social activity to protect environment and improve quality of living of people in society for the sustainable growth.
- 2.21.6 All employees shall participate in all activities organized by the Company in regard to safety, occupational health and environment.

2.22 Policy on operations under environmental standards

The Company is determined to grow under responsibility to environment situation. The Company, hence, pays attention to strict practice according to environmental policy. The regulations are as follow:

- 2.22.1 Assess the environmental risk, occupational safety and health of residential construction project to prevent and reduce potential impact.
- 2.22.2 Prepare for emergency situation.
- 2.22.3 Provide protection plan, suspending emergency situation, and mitigating potential impact.
- 2.22.4 Lay down practice to correctly eliminate sewage and scrap according to technical principle.
- 2.22.5 Regularly provide inspection, monitoring and assessment of environmental operation for further improvement.
- 2.22.6 Provide communicating important information of environment, safety and occupational health for all employees and receive grievance filed within the organization.

2.23 Policy on responsibility to community and society

As a Thai company, which is regarded as part of the Thai society, the Company definitely has duty to help developing and returning profit to community and society so that the Company sustainably grows with community and society. The regulations are as follow:

- 2.23.1 Support communication and understanding to society of the information that can appropriately be publicly disclosed regarding social and environmental responsibility of the Company.
- 2.23.2 “Noble ID” has been created to build relationship with the customers who support the project under Noble brand. The main objective is to build sustainable relationship in accordance with the corporate main vision which is to build a house beyond a residence for better tomorrow. Noble ID is the channel for communication and provision of assistance and facilitation as well as arranging useful activities and support customer living. In addition to development of residential projects with the aim to create satisfaction beyond expectations and pride of all groups of customers and all Noble residents, Noble continuously shares the concept of Life Architecture and creation of better tomorrow to all Noble residents through Noble Living Magazine and other channels.
- 2.23.3 In order to prevent environmental damage and mitigate the adverse consequences to people’s quality of life, the Company will use the only resource that is completely necessary for its operation.
- 2.23.4 Regularly create social and environmental awareness among Management and employee.
- 2.23.5 Regularly hold social activities to return profit to the society which must be appropriate activity for the benefit of the community and society.
- 2.23.6 Inspect information of donors to ensure that receivers efficiently use the fund and really beneficial to society.

2.24 Policy over government and related agencies

The Company respects and follows the relevant laws and regulations strictly. We emphasize and understand the intention and objective of each of every related land and building Act, e.g., Land Allocation Act, Condominium Act, Building Construction Act, in order to advantage the Company’s customer, environment, community and society.

3. Compliance Monitoring and Review

The Company makes compulsory that the Board of Directors, executives, and employees are assumed duty to strictly recognize and apply the above business Code of Conduct, without exception and not being voluntary practice. And they cannot claim that they do not know direction of this Code of Conduct, which the working regulation's company has determined punishment clauses if it is defied. The Company has arranged training course and regularly monitor by Human Resource's practice.

All management of the organization must be responsible and shall regard as an important matter to ensure their direct subordinates really understand the business Code of Conduct and realize that they have to seriously comply with the code.

The Board of Directors, executives, and employees are asked to first use their own judgment by asking themselves the following questions if they have any concerns about the Company's Code of Conduct:

- Is that an illegal action?
- Does that action violate the Company's policies or corporate culture?
- Does that action have an impact on the Company's image and reputation?
- Will that decision have a negative impact on the Company's stakeholders?
- Is that a socially acceptable action?

Such inquiries should be directed to their heads and supervisors if they cannot possibly be answered by them.

The Company gives the opportunity for stakeholders and related parties to express their opinions regarding the Company's operation or make complaints on unfair treatment matters, unlawful and unethical actions through the Company's website www.noblehome.com the central division will then pass these matters to the Board of Directors and the Executives afterwards.

The Company reviews business ethics every two years or annually if there is a significant change arises so as to modify the code to effectively cover and conform to directions adopted by the Stock Exchange of Thailand and other relevant agencies, as well as keeping pace with dynamism of business situation.

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