

Conflict of Interest Prevention Policy
Nova Empire Public Company Limited

Nova Empire Public Company Limited has prepared this Conflict of Interest Prevention Policy to decide on the business activity operation under the main concern of the Company's maximum benefits. It is determined that the related parties or stakeholders of the considered transactions shall notify the Company about their relationship or stakeholding in such transactions, not participate in consideration, and have no authority to approve the said transactions. There are the following crucial principles.

1. The Company shall prudently, honestly, reasonably, and freely consider eliminating the conflict of interest problems within the good ethics framework, and completely disclose the data mainly for the overall interests of the Company and its customers.
2. The Company shall uphold justice and create transparency in business operations, and avoid the situations that cause a conflict of interest.
3. The Board of Directors oversees to ensure the compliance with the prescribed procedures with prudence within the principles of reason and independence to one another, the availability of transparent process in approval of entering the transactions, and completely takes into account the Company's maximum interests according to the rules of the Office of the Securities and Exchange Commission.
4. The directors, executives, and employees at all levels shall inform the Company about the relationship or the related party transactions in the entity that may cause a conflict of interest. However, the stakeholders shall not be involved in deciding the said matters.
5. The Board of Directors governs the Company and the Management to properly and completely disclose the data of the transactions that may have a conflict of interest in the Annual Report and Form 56-1.
6. The employees shall comply with the business ethics without seeking personal interest that conflicts with the interests of the Company or the customers, and shall not allow the reasons in part of their personal or family members to influence the decision-making that deviates from the principles by taking into account the interests of the customers and the Company only.

7. The Company establishes a policy prescribing that the organization shall be structured by separating the department and the employees who have the duties and responsibilities or have the nature of work performance that may cause a conflict of interest.
8. The Company establishes a policy prescribing that the data access or data perception of the Department and the employees shall be based on the principles of the Need to Know Basis, and must not cause a conflict of interest.
9. The executives and employees are prohibited from either direct or indirect disclosure of internal data to any persons unless approved by the authorized person only.
10. The Company establishes a policy prescribing that the head of each department shall have the duties and responsibilities to govern and audit the work performance inside the department to be in line with this Policy.
11. The Company establishes a policy prescribing that the Internal Audit Department in cooperation with the Company Secretary Office shall have the duty to monitor, audit, govern, and assess the adequacy of the work performance control, and the internal control system of each department to be in line with this Policy.
12. The Company establishes a policy prescribing that the Company Secretary Office shall review and update this Policy as necessary and appropriate at least once a year, and propose to the Nomination, Remuneration and Corporate Governance Committee, and the Board of Directors for considering the approval if there are changes.

This conflict of interest prevention policy is effective from 9 November 2020 onwards.



(Parleerat Panboonhom)

Chairman of the Board of Directors

Nova Empire Public Company Limited