



កាន់តែទុកចិត្ត កាន់តែចម្រើន

ហត្ថាកសិករ លីមីតធីត

HATTHA KAKSEKAR LIMITED

**THE CONFLICT OF
INTEREST POLICY IN
SUMMARY**

HKL uphold the integrity against conflict of interest which may happen within our business operation and the market we operating in. The conflict of interest policy was approved board of director that required:

I. All employees shall avoid such as below activities;

(1) Using the resources, intellectual property, equipment and software of HKL for personal gain, unless approved by management.

(2) Taking any opportunity or information collected during the course of being employed by HKL for personal gain, especially where it concerns the interest of the company.

II. All employees shall disclose below activities in writing to manager and the Compliance Department:

(1) All of outside activities, financial interests or relationships that may either result in a conflict or the appearance of one.

(2) Holding of position in other organizations, profit or non-profit, or subsidiaries, particularly if the organization has any relationship with HKL or may anticipate the support from the company while still employed.

(3) Family member working for HKL or the companies in the Krungsri's financial business group.

III. All employees shall avoid such as below activities in business conduct;

(1) Making financial gain, or financial loss at the expense of the customer.

(2) Having an interest in the outcome of a service provided to the customer or of a transaction carried out on behalf of the customer, which is distinct or might damage or adversely affect customer interest in the outcome.

(3) Any conflicts between customers, either in different or the same business areas.

(4) Any other conflicts where the market ultimately suffers detriment

IV. Relevant employees shall establish temporary Information Walls around particular areas or transaction teams in the following cases:

(1) Receiving information that could create a conflict of interest between the customer and HKL/Company and another customer

(2) Involving in potentially competing transactions

(3) Receiving instruction from the Compliance Department

V. Relevant employees in the Information Walls shall take reasonable steps such as;

(1) Maintain security and confidentiality of protected information

(2) Do not pass protected information to any individual located outside of that Information Wall unless it is allowed in the Wall Crossing related Procedures.

VI. Wall Straddlers cannot have any direct involvement (excluding oversight and approval role) on both sides of transactions which conflict each other.