



Code of Conduct

AIM REIT Management Company Limited
AIM Real Estate Management Company Limited

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1. Introduction

The Company, in its capacity as the REIT Manager, recognizes its direct and indirect responsibilities to society, and places priority on the interest of trust unitholders. It is committed to conducting management with integrity and fairness, upholding anti-corruption principles, respect for human rights, and ensuring fair labor practices, as well as conducting business with social responsibility and environmental stewardship. Accordingly, the Company has established a Code of Conduct, which all employees are required to adhere to as representatives of the Company.

2. The Company's Code of Conduct

2.1. Responsibilities to Shareholders and Trust Unitholders

The Company is committed to serving as a good representative of its shareholders in conducting business, including the management of the REIT for which it has been appointed as the REIT Manager, with the objective of delivering maximum value for both shareholders and trust unitholders. The Company focuses on long-term growth in value of both the Company and the REIT through the delivery of attractive and sustainable returns for the Company and the REIT, alongside transparent and reliable information disclosure to shareholders and trust unitholders.

2.2. Ethical Business Operations

Ethical business conduct is a code of conduct that the Company considers fundamental and is committed to upholding in the management of the REIT. The Company manages the REIT in strict compliance with applicable laws, including the Securities and Exchange Act, the Trust for Transactions in Capital Markets Act, regulations of the Securities and Exchange Commission (SEC), and the Trust Deed, while upholding good corporate governance principles. This includes avoiding actions that may cause conflicts of interest, fostering free and fair trade competition, treating all tenants equitably, and refraining from engaging in misleading advertising or disclosing false statements that may cause confusion, misunderstanding, or harm to trust unitholders and the investor. These practices are intended to ensure fairness to other business operators, Trust unitholders, and all relevant stakeholders, and to build long-term investor confidence.

2.3. Respect for Human Rights and Fair Labor Practices

The Company recognizes the importance of fundamental human rights, including the right to life and liberty. It firmly believes that respect for human rights forms the foundation of individual development, and is committed to upholding equality under the law, freedom of expression, and labors rights as defined by labor laws, as well as access to social welfare benefits. It is also committed to ensuring fair and non-discriminatory recruitment and selection of employees, without restriction based on race, religion, or gender.

2.4. Responsibility to Consumers (Tenants)

As the REIT invests in assets – including land and buildings such as warehouses, factories, cold storage buildings, liquid chemical tanks, shopping centers, and community malls – the Company prioritizes fair and responsible treatment of its tenants. This includes ensuring tenant safety, sanitation and hygiene. The Company closely monitors and oversees the operation of property managers to maintain standard of service and ensure the delivery of high-quality and safe services that pose no danger to tenants.

2.5. Environmental Protection

The Company recognizes the importance of environmental stewardship and is committed to protecting the environment, conserving natural resources, and reducing various adverse environmental impacts. The Company believes that environmental protection is a shared responsibility of all, and therefore encourages all employees to use resources efficiently by selecting energy-efficient equipment and promoting the recycling and reuse of resources. The Company also actively promotes energy conservation initiatives and ensures strict compliance with all applicable environmental laws.

2.6. Anti-Corruption

The Company opposes all forms of corruption and has a policy of not offering money, incentives, gifts, or any special benefits of any form, whether directly or indirectly through third parties, to customers, the Company's business partners, external organizations, or government officials, in order to obtain or retain a business advantage or benefit. This includes a prohibition on facilitation payments or any other payments intended to expedite or facilitate routine actions, with the sole exception of customary business hospitality.

2.7. Conflict of Interest Avoidance

In the course of their duties, situations may arise where an employee's personal interests conflict with those of the Company and the REIT. Such conflicts may arise in various forms. Therefore, the Company has established guidelines for all employees to follow to avoid conflicts of interest, as detailed below.

1) Acceptance of Money or Rewards

Employees must not accept any money or personal benefits of any kind from the Company's customers, tenants, business partners, or any other person, in connection with the performance of their duties on behalf of the Company.

Employees must not lend or borrow money, or solicit money, goods, or other items from customers or persons conducting business with the Company, except for ordinary borrowing arrangements with banks or financial institutions in their personal capacity as a customer of such banks or financial institutions.

2) Other Business Operations

Any personal business undertaken by an employee must not interfere with the performance of their duties or working hours for the Company. Employees are also prohibited from engaging in or participating in any business that competes with the business of the Company Group, regardless of whether such employee derives direct or indirect benefit therefrom.

3) Conducting Business with the Company Group

Any business dealings with the Company, whether conducted in a personal capacity, through family members, or through a legal entity in which the employee has an interest, must be disclosed to the Company prior to entering into such transactions.

Employees who have a conflict of interest are prohibited from approving the entry into such transactions or taking any actions on behalf of the Company in relation thereto.

Persons undertaking transactions on behalf of the Company are required to verify whether business counterparties have any relationship with any employee of the Company prior to entering into such

transactions, in order to prevent any potential conflicts of interest. The definition of "relationship" shall be in accordance with the rules of the Board of Governors of the Stock Exchange of Thailand regarding the disclosure of information and conduct of listed companies in relation to related party transactions.

2.8. Protection and Maintenance of Company Assets

Employees at all levels are responsible for safeguarding and maintaining the Company Group's assets and ensuring that such assets are used for the maximum benefit of the Company Group, and not for personal gain or the benefit of others. The Company has a policy to prepare business related documents, maintain financial and accounting records, and prepare financial reports with integrity, in a timely, accurate, and complete manner, in accordance with applicable laws and widely accepted accounting standards.

All employees must handle confidential information appropriately and must not communicate material, non-public information obtained in the course of their duties to other departments or external parties who are not entitled to access such information. Employees are also responsible for making every effort to protect such confidential information, including through the secure storage of confidential documents and data.

2.9. Intellectual Property

The Company's intellectual property, including copyrights, patents, trademarks, and trade secrets, is critical to maintaining its competitive advantage. Therefore, all employees have a duty to protect, preserve and defend the Company's rights to all of its intellectual property and to exercise those rights responsibly. Additionally, all employees must respect the lawful intellectual property rights of others.

2.10. Use of Inside Information and Trading in REIT Units

Employees at all levels must not use inside information or material non-public information of the REIT under the Company's management, including information of listed companies that the REIT engages in transactions that has not been disclosed to the public, for their own benefit or disclose such information to any other person, for the purpose of trading in the REIT trust units or securities of such listed companies.

Employees at all levels have the right to trade REIT trust units under the Company's management. However, employees who wish to trade REIT trust units must comply with the Company's securities trading policy for directors, executives, and employees, in order to prevent potential conflicts of interest and ensure that all trust unitholders are treated fairly and transparently.

2.11. Disclosing Information or Giving Interviews to the Public

Any information disclosed in relation to the Company and the REIT under the Company's management must be based on truthful and accurate information and communicated with due care.

Individuals who are not authorized or have not been assigned are prohibited from providing any information or granting interviews to the media or the public regarding, or making any reference to, the Company and the REIT in any manner that may affect the reputation or business operations of the Company and the REIT.

2.12. Related Transactions between the Company and the REIT

In the event of any transactions between the Company and the REIT under its management, the Company shall comply with the applicable rules and approval procedures, as if such transactions were conducted with third parties.

2.13. Information and System Security

The REIT Manager has established methods and procedures for the use of data within the central information system database, to ensure directors, executives, and employees of the REIT Manager use the information correctly. This is intended to ensure that the REIT Manager's internal data management is secure, reliable, and accessible at all times.

In managing information in each database, each department is responsible for overseeing the accurate, secure, and consistently available storage of the data under its control. Each department must classify data into appropriate groups, define authorized user groups, and establish the access permissions for each user group.

2.14. Emergency Response

To ensure the continuity of the REIT management even during a crisis or emergency, the establishment of effective crisis and emergency response processes is essential to enable the Company to address

unforeseen events and resume operations in a timely manner. This will help minimize impacts on the operations of the assets in which the REIT invests and/or operations of the REIT itself – including, but not limited to, financial, legal, reputational, and other potential impacts. Accordingly, the Company has established an effective and practical Business Continuity Plan (“BCP”) to prepare for crises or emergencies that may restrict access to the office building and impact resources critical to normal business operations. The BCP covers five types of emergencies as follows:

1. Natural disaster
2. Accidents or man-made incidents
3. Public protests or blockades affecting Company operations
4. Epidemics or serious infectious diseases
5. Cyber Theft incidents involving information technology systems

3. **Business Partners Code of Conduct**

The REIT Manager is committed to promoting ethical and responsible business conduct across all aspects of the supply chain, including human rights, labor practices, occupational health and safety, environmental, anti-corruption measures, and personal data protection. To this end, the REIT Manager has established screening and due diligence guidelines for business partners – including property managers – (collectively referred to as “**business partners**”), who serve as vital business allies and a key component of the supply chain that generates value for the REIT. The objective is to prevent the trust unitholders’ fund from being used to support any illegal or unethical activities through these business partners, in any form whatsoever.

The REIT Manager requires appointed or hired partners to respond to a human rights questionnaire and provide written assurance that they will not violate human rights principles and will strictly comply with applicable labor laws, covering the following key human rights principles.

1) **Appropriate and Safe Working Conditions**

The business partners shall ensure all employees and workers are provided with a suitable, hygienic, and safe working environment in accordance with the Safety First standards, particularly in the management of high-risk assets such as chemical storage tanks.

2) **Labor Rights**

The business partners must certify and ensure that all employees and workers receive compensation, work in accordance with prescribed working hour limits, and are entitled to leave and various benefits in full compliance in accordance with applicable labor laws, including payment of wages not less than the statutory minimum wage.

3) Prohibition of Illegal Labor

Business partners must not employ child labor, undocumented migrant workers and must not use forced labor or engage in or be involved with human trafficking in any form.

4) Equality and Non - Discrimination

Business partners must treat all employees and workers fairly and equally, without discrimination, harassment, or bullying, regardless of race, nationality, religion, gender, age, disability, or any other status.

Furthermore, the Company has established a whistleblowing channel, allowing employees of business partners to report human rights violations directly to the REIT Manager. Appropriate measures are in place to protect whistleblowers, as detailed in the REIT Manager's Whistleblowing Policy.

For business partners acting as property managers, the Company requests that such property managers prepare and submit statistics on accidents or safety incidents occurring within the REIT's assets under their management, on a monthly basis or within such timeframe as specified by the REIT Manager.

In addition, the Company requires its business partners to complete a Third Party Due Diligence Form to verify their compliance with personal data protection laws and to identify any associated risks.