



Raimon Land PLC. Code of Conduct Policy

Policy Reference # HR001

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Revision Control

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V1.0	May. 28, 2009	Original Issue	Haruthai Y./ VP - HR	Hubert R.Viriot /CEO
V1.1	Mar.15, 2011	Revised 1	Jariya P./ AVP - HR	Hubert R.Viriot /CEO

Raimon Land PLC.

Code of Conduct Policy

1.0 Purpose

- 1.1 To establish the general expectations and principles in respect to conduct expected of all Employees within the company.
- 1.2 To ensure clarity and to prevent any misunderstanding of what is expected from all Employees.

Accordingly, Raimon Land Employees should ensure familiarity with the content of this Code of Conduct and act in accordance with the principles laid out. Any breach of this Code of Conduct may result in disciplinary action.

2.0 Scope

- 2.1 This procedure applies to all Employees and individuals within the company.

For the avoidance of doubt the term 'Employee' includes, but is not limited to, all managers, vice-presidents, executive officers, consultants, full time employees and part time employees of Raimon Land, its subsidiary companies and affiliated entities.

Should the Employee be in any doubt regarding any aspect, he/she should refer any questions to his/her Manager.

3.0 Responsibilities

- 3.1 The HR department is responsible for promoting and maintenance of this policy and responding to questions regarding this policy.
- 3.2 All Managements are responsible for the conduct and discipline of Employees falling under his/her management, as well as being the first point of contact in the event the Employee may wish to raise a grievance.

4.0 Policy:

4.1. General Code of Conduct and Ethics

Raimon Land Employees should behave with integrity, impartiality, honesty and in a professional manner as representatives of the Company.

- 4.1.1 Each Employee should render the highest level of service to his/her clients - both internal and external - and to carry out his/her duties

with professionalism, integrity, courtesy and loyalty to Raimon Land. Also, to conduct business in the spirit of fairness and goodwill to his/her fellow Employees in the Company.

- 4.1.2 All correspondence, documentation and reports must follow the format and guidelines as issued by the Company from time to time, each Employee must ensure that he/she does not act outside of his/her scope of duties and authority.
- 4.1.3 Employee's name and signature must appear on all proposals, reports and other documentation prepared by him/her indicating his/her status as an authorized representative Employee for and on behalf of Raimon Land, in accordance with delegated authority levels.
- 4.1.4 Each Employee should strive to protect the Company against fraud, misrepresentation and unethical practices in respect to all transactions and activities. Should an Employee have any concerns in this respect, he/she should report these immediately to his/her Manager.
- 4.1.5 An Employee must inform the management of the Company of the nature of any business connection, interest or other affiliations he/she, and/or his/her spouse/partner/family member, may have in connection with the service to any client of the Company.
- 4.1.6 Employee shall not take up directorships, employment or part time commercial duties (paid or unpaid) or have any interest in any business or concern (including partnerships, sponsorships or equity stakes) outside the Company, except with the prior approval in writing from the Company. Approval will only be considered in circumstances where the interests of the Company will not be prejudiced, where the Employee's ability to discharge his/her relevant duties is unaffected and there is no perceived conflict of interest.
- 4.1.7 Employee shall not accept gifts (in the form of products & services), fees, commissions, kick-backs, etcetera ("Gratuities"), in cash or kind from anyone including customers, suppliers and third parties other than Raimon Land. In the event of such gifts being offered to an Employee, it shall be the responsibility of such Employee to bring the gifts along with the giver's detail information to Human Resources Department. The Company will send the Raimon Land "Thank you" note and the Company reserve the right to handle the gifts as appropriately as it seems fit.
- 4.1.8 Any Employee or business function, who is planning to give gifts to suppliers/customers/government officials/third parties, must obtain written approval from CEO before doing so.

4.2. Confidentiality and Official Information

Employees owe a general duty of confidentiality to Raimon Land as their Employer. They are therefore required to protect official information held in confidence. The attention of Employees is drawn to the confidentiality clause already signed by them in their Employment Agreement.

4.3. Standards of Propriety

Employees should abide by these rules in relation to possible conflict of private interest with official duty. They should not misuse their official position or information acquired in their official duties to further their private interests or those of others outside of business, and must comply with the declaration of those interests.

4.4. Integrity

Employees should not use their official position to receive or attempt to obtain any payment or other consideration for doing or not doing anything, or showing favour or disfavour to any person. They should not receive benefits of any kind from a third party which might be reasonably seen to compromise their personal judgment and integrity.

An Employee shall not bribe or give similar consideration to any person or Company in order to obtain business for the Company.

In certain circumstance, a possible conflict of interest situation may exist where an Employee has a personal relationship with an employee or affiliate of a supply company utilized by their particular department within Raimon Land. In such instances, the relationship must be immediately declared in writing to Raimon Land Human Resources by the Employee (refers to 1.4 above).

4.5. Relations with the Public

Employees who deal with external clients should do so efficiently, promptly and without bias. They should offer the client the highest standards of professionalism and service.

4.6. Media Protocols

All and any inquiries regarding Raimon Land received from the media (press journalists, reporters, television, radio, etc) and other external parties (including customers) should be referred in the first instance direct to the Marketing Department.

Even if the inquiry seems innocent or the caller is persistent, Employees are not to make any comment or enter into any correspondence beyond advising that the Company will respond to the query through the proper channels.

Employees should take down the contact details, the nature of the inquiry and pass on the information to the Marketing Department without delay. If the person concerned is not willing to provide this information, kindly request that they make the appropriate contact themselves. These members of staff shall deal with the inquiry appropriately since it falls within their area of responsibility and expertise, following consultation with the Executive where required.

4.7. Use of Company Resources

Employees must ensure the proper, economical, effective and efficient use of all Company resources. Misuse of, loss and/or damage to Company property and/or resources may result in an investigation and appropriate penalty being imposed on the Employee.

Out-sourcing of work to third party providers should only occur in instances where the work required is well beyond the skills and/or experience of the Employees within the department concerned and/or this is a more cost effective option.

4.8. Specific Duties

Employees hereby commit themselves to:

4.8.1 Professional Conscience

4.8.1.1 To devote all the care that their professional conscience demands in the execution of their duties and the responsibilities which are entrusted to them.

4.8.1.2 To practice moderation and caution so as not to endanger their client's situation, their own situation, and/or that of the Company, and to protect and promote the legitimate interests of their clients and the Company.

4.8.1.3 To protect the Company and its clients against fraud, misrepresentation or unethical practices.

4.8.2 Integrity

4.8.2.1 To be able to justify his/her actions, by keeping documented records of any and all Internal/External correspondence.

4.8.2.2 To protect in all circumstances the legitimate interests of the Company and their stakeholders.

4.8.2.3 To ensure that the financial obligations and the commitments consequential to the drawing up of contracts between clients and the Company are expressed in writing and that they state the agreements reached by all parties, who must each have a copy of the contract at the time of signing

4.8.3 Competence

To make all reasonable efforts to keep abreast of legislation and of all information and essential developments within the market, which might impact on the responsibilities that have been entrusted to them.

4.8.4 Relations with Colleagues

4.8.4.1 To ensure that fair competition, courtesy and respect will always be the hallmarks of relations with colleagues.

4.8.4.2 Not to initiate in public, any criticism of the professional practices of fellow Employees and/or of the Company, including but not limited to disagreeing publicly with any statement or policy of the Company.

4.8.4.3 To contribute to the continuing high standing of the Company by sharing with their colleagues the fruits of their experience, and by enhancing the professional skills of their colleagues with a view to promoting their advancement and to improving the quality of services rendered.

4.8.4.4 To avoid a conflict with a fellow colleague that causes any harm to the interests of the Company or its clients.

4.8.5 Code of Practice

4.8.5.1 Employees should not deny professional services to any person for reasons of race, creed, sex, religion or nationality and shall not be a party to any plan or agreement to discriminate against a person or persons on the basis of race, creed, sex, religion or nationality.

4.8.5.2 All Employees should ensure that they are clear of what is required of them in respect to their work duties / performance, and to adhere to all reasonable work orientated management instructions, as may be issued from time to time.

4.9. General Behavior

The intention of these guidelines is to create a positive workplace and an environment which shows respect for fellow colleagues and promotes harmonious working relationships. The following should be noted:

- 4.9.1. Employees need to ensure punctuality, in keeping with official office hours, and their attendance at both internal and external meetings.
- 4.9.2. Attention to personal hygiene is to be maintained.
- 4.9.3. Employees who need to meet with clients after hours should still dress professionally.
- 4.9.4. Mobile phones should be used with due sensitivity to clients and colleagues in the workplace. For example: diverted during meetings with internal/external clients, unless business critical in which cases Employees should excuse themselves when taking the call – talking on mobiles during meetings shows disrespect to those present and is disruptive; loud/intrusive ring tones to be avoided: silent/vibrate functions should be activated instead; avoid talking loudly on the phone in the presence of others.
- 4.9.5. Due to the health risks associated with secondary smoking, Raimon Land operates a smoke-free work environment.
- 4.9.6. The use inappropriate and offensive language or derogatory comments in any form will not be tolerated.
- 4.9.7. The consumption of alcohol on Company premises is not permitted, nor is this permitted during working hours. There may be certain instances where alcohol may be consumed by partaking Employees off-site, in certain business settings. Please seek guidance from your Manager in this respect, if applicable. A zero tolerance to use of illegal substances prevails at all times.
- 4.9.8. Employees should at all times be conscious of their behaviour and the potential impact this has on their Colleagues in the work setting. This includes maintaining general noise at an acceptable level, not unnecessarily distracting or disrupting others whilst working, keeping their own work area as well as the communal areas, including bathroom facilities, neat and tidy; avoid eating at your workstation/in public view, especially if client facing; treating all Colleagues and Company facilities with due respect, adopting a helpful and positive attitude, being a team player, showing a proactive approach to identifying and solving problems. It all adds up to seeking opportunities to contribute in making Raimon Land a professional yet happy and productive Company.

4.10. Fraud

The company has a zero-tolerance policy on theft; any employee—including executives and managers—who violates it will be terminated. The following should be noted:

4.10.1. Fraud is described as the willful or dishonest misuse of the Company's resources, including acts of dishonesty, deception or of omission, the improper use of influence or position and/or the improper use of information. Some examples of fraudulent conduct may include:


- 4.10.1.1 Theft of assets;
- 4.10.1.2 Theft of intellectual property;
- 4.10.1.3 Unauthorized and/or illegal use of assets, information or services for private purpose;
- 4.10.1.4 Misappropriation of funds;
- 4.10.1.5 Falsification of records;
- 4.10.1.6 Taking unrecorded leave.

4.10.2. The Company will not tolerate any fraudulent conduct from Employees and visitors. Because of the Company's desire to prevent and detect theft, Employees' accept the Company to conduct routine searches of the workplace when theft is suspected, and electronic surveillance.

4.10.3 Fraud is ground for immediate termination and may cause the Company to bring criminal charges against the responsible party.

This policy is effective on Mar.15, 2011

Approved by _____


(Mr. Hubert R. Viriot)
Chief Executive Officer
Raimon Land PLC.