



**Notification of the Government Pension Fund  
on Code of Conduct for Employees and Workers  
B.E. 2561 (2018)**

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Whereas it is expedient to revise the Code of Conduct, which is the standard of behavior and performance of personnel working for the Fund to be appropriate and consistent with the international standards applicable to the investment management business of the Pension Fund in general;

It, therefore, to enhance the performance of personnel working for the Fund, to be honest, fair, prudent, and transparent, which will bring dignity, prestige, reputation, and a good image with the trust and faith of the members and the general public the Fund and its personnel;

By virtue of Section 24 of the Government Pension Fund Act B.E. 2539(1996), in conjunction with the Resolution of the Subcommittee on Good Governance No. 3/2561 dated July 16, 2018, the Secretary-General hereby issues the Notification as follows:

Clause 1. This Notification is called "Notification of the Government Pension Fund on Code of Conduct for Employees and Workers B.E. 2561 (2018)."

Clause 2 . This Notification shall come into force from the day following the Notification date onwards.

Clause 3. The following shall be repealed:

(1) Notification of the Government Pension Fund on Code of Conduct for Employees and Workers B.E. 2559 (2016) dated July 29, 2016;

(2) Notification of the Government Pension Fund on Code of Conduct for Employees and Workers (No. 2) B.E. 2559 (2016) dated November 29, 2016;

Clause 4. In this Notification:

"Employee" means an officer and employee of the Fund and shall include the Secretary-General;



"Family person" means an employee's lawful spouse and minor children. It shall include persons living together as husband and wife with the employee in the scope of investment information recognition;

"Juristic Person" means a juristic person in the form of a limited company, a public limited company, a limited partnership, or an ordinary partnership;

"Related juristic person" means a juristic person in the form of a limited company, a public limited company, an ordinary partnership, a limited partnership, or a group of persons in which an employee or family member has the power to sign, whether or not such employee or a family member has ownership in securities;

Clause 5. Laws, regulations, rules, Notifications, orders, and related policies:

Employees must thoroughly study the laws, regulations, rules, Notifications, orders, and committee policies related to the Fund's activities and the employees' performance. It provides employees with the correct knowledge and understanding of the roles, duties, and responsibilities of the organization and themselves. It also enables employees to perform their duties correctly and entirely under the organization's mission and objectives within the framework of laws, regulations, rules, Notifications, orders, and committee policies.

The laws, regulations, rules, Notifications, orders, and committee policies relating to the Fund's affairs and employee performance include:

- (1) Government Pension Fund Act, B.E. 2539(1996) and its amendments;
- (2) Ministerial Regulations and Ministerial Notifications issued under the Government Pension Fund Act, B.E. 2539 (1996) and their amendments;
- (3) Laws, regulations, rules, Notifications, orders, and committee policies which the Committee and the Secretary enforce- General;
- (4) law on securities and exchange concerning the investment management of the Fund; including rules, regulations, announcements, and orders in respect of investment management of funds issued by the following agencies:
  - (a) Office of the Securities and Exchange Commission;
  - (b) The Stock Exchange of Thailand;
  - (c) Bank of Thailand;
  - (d) Thai Bond Market Association;
  - (e) Other agencies have the power to issue rules to supervise the Fund's investment management;



(5) Foreign law related to investment management in the country where the Fund invests money;

(6) Accounting standards issued by the Federation of Accounting Professions for applying to fund businesses;

(7) Laws, regulations, rules, Notifications, and any other orders that come into force and affect the funds and employees to comply with, such as the law on government information, the law on violations of officials, the law on the fault of an employee in an organization or government agency;

Clause 6. Code of Conduct and Principles of Operation:

Employees should treat their members, supervisors, subordinates, colleagues, and stakeholders with honesty, integrity, and adherence to the dignity of the organization and their own. It shall also adhere to the code of conduct and ethics according to the following international standards:

- (1) Perform duties with honesty, fairness, and integrity;
- (2) Concerning the Members' Interests at most;
- (3) Upholding fairness and impartiality;
- (4) Perform duties with skill, care, and diligence;
- (5) Focus on efficient and effective management and control of operations;
- (6) Strictly protect confidential information that should not be disclosed;
- (7) Adhering to legal discipline rules and regulations of the Fund, including standards of market conduct;
- (8) Ensuring the competent staff readiness and accountability for the outcome of decision-making on their duties;
- (9) Prevent conflicts of interest;
- (10) Focus on communication and providing clear and transparent information to members;

Clause 7. Code of Conduct for Employees:

(1) Employees must strive and maintain integrity, fairness, and morality and strictly operate within the framework of the Board of Directors' law, rules, regulations, Notifications, orders, and policies, including professional standards;



(2) Employees must regularly study and review laws, regulations, rules, Notifications, orders, and policies, including professional standards that concern the activities of the Fund and the operations for which they are responsible. Employees shall know, understand, and be able to operate successfully following the objectives of the Fund within the framework of laws, regulations, rules, Notifications, orders, and policies, including professional standards;

(3) Employees must regularly study and review operational processes, particularly internal control, risk management, and information technology security. It ensures that employees can perform their tasks thoroughly and accurately and follow established procedures. In addition, employees should study for additional knowledge and experience to develop themselves to work more efficiently and effectively;

(4) Employees must devote their time entirely to their duties and responsibilities in the best interest of the Fund and its members, subject to the following restrictions:

(a) Employees are prohibited from doing business or doing activities that are in competition with the business of the Fund or in conflict with the interests of the Fund;

(b) Employees are prohibited from undertaking any business or activities related to the management of investments, either personally or on behalf of the Fund, unless the prior written approval of the Secretary-General has been obtained. The activities related to investment management include being a lecturer, speaker, or panelist for agencies involved in investment management or giving interviews, writing articles or analyses on matters related to investment management, and disseminating them to the public through various media;

(c) Being a director or working in an external agency requires written approval from the Secretary-General following the Government Pension Fund Committee Rules on Criteria for Employees to Work in External Agencies;

In case of doubt as to whether any business or activity is prohibited under (a), (b), or (c), the employee shall inquire from the supervisor or the top executive of the Corporate Governance or the Legal first.

(5) The business operation or the activity which has been approved under (4) (b) or (c) must:

(a) does not affect the time and duties, and responsibilities of employees;

(b) does not cause damage to the Fund or society at large;



(6) Participating in political activities shall be regarded as private activities of employees. Employees must not mislead the general public that the Fund is a sponsor of political activities or any political group is strictly prohibited.

(7) Employees must not perform the following acts:

(a) Slander, insult, defame or do anything that creates or may cause misunderstanding of any person, entity, or Fund, such as using social media or other information systems;

(b) Molest, threaten, or sexually harass any physical or verbal act of sexual nature towards another employee or member or other people in contact;

(8) Employees who are supervisors at all levels must act as role models for their subordinates and must treat their subordinates with justice. Supervisors shall adhere to explanatory principles and rationale, care for, encourage development, and listen to the opinions or suggestions of subordinates well. If it is a reasonable opinion or recommendation, it will be considered for the benefit of the Fund and its members;

(9) Employees must treat their supervisors with respect, politeness, and humility;

(10) Employees must treat their colleagues with courtesy, kindness, and respect for the dignity of others. Employees must not distort, slander, bully or damage the reputation of others and do not use other people's work to impersonate their work;

(11) Employees must cooperate and strengthen teamwork and support other departments' operations to achieve goals and for the benefit of the Fund and its members;

(12) Employees must be aware of their responsibilities towards society and the environment. It shall promote the activities of the Fund to protect the environment and does not take any action that causes or may cause damage to natural resources and the environment. It also uses the available resources economically and cost-effectively to benefit the Fund and its members;

(13) Employees must adhere to and operate following policies, requirements, and standards on occupational safety and health within the strictly related working environment;

Cause 8. Principles of treatment for members and stakeholders:

(1) Employees must treat members with care, respect, politeness, and dignity, emphasizing service that is convenient and beneficial to members;

(2) Employees must provide services to all members equally without discrimination;



(3) Employees must communicate and provide information about the Fund to members accurately and entirely within a reasonable time. Communicating and providing the information must be clear, unambiguous, and not misleading in its essence. Employees must consider and respond without delay when receiving any complaints or questions from members, following the rules outlined in clause 14;

(4) Employees must treat the Fund's stakeholders, including business partners, creditor and debtor parties, government officials, society, and the environment, fairly and without discrimination. Employees must behave courteously, respect, and be responsible for the rights of those stakeholders. It also listens to the opinions or suggestions of stakeholders and considers without prejudice, not to offend or condemn without facts;

(5) Employees must refrain from any act that violates or threatens members or stakeholders based on basic human rights principles such as race, nationality, color, gender, age, religion, disability, education, and social status;

Clause 9. Code of practice for Investment Management for Funds:

Employees must be aware of acting as a fiduciary duty that members are entrusted to invest their retirement savings in seeking benefits suitable for the prudent person standard.

Code of practice for employees in managing investments following the principles of responsible investment with an emphasis on environmental, social, and governance factors, which includes:

(1) Investment management with the duty of care like a good professional according to the following principles:

(a) Employees must be aware that The Fund can only invest in securities stipulated by laws, ministerial regulations, ministry notifications, regulations, rules, announcements, and committee policies. The type of securities invested must be consistent with the objectives, policies, and investment plans specified. It includes the need to regularly assess the Fund's performance and adjust the investment ratio under the current investment situation and the quality of the securities;

(b) Employees must make reasonable trading decisions under good investment management principles and have sufficient research information to support their decision. The employees must not trade securities in a manner that is churning or trading changing hands too often to prevent the Fund from having unduly increased expenses;



(c) Employees must focus on diversifying their investments in multiple securities to reduce the risk of concentrated investments. It must pay attention to risk control measures that determine investment in securities with analysis or research on whether it is a stock with fundamentals or high growth potential. It also has to be appraised by an independent appraiser in the case of securities required by law;

(d) Employees must maintain independence in making investment decisions without prejudice and domination of any influence:

1) Employees are required to regularly visit the management of the issuing company to ensure the maintained quality of the securities invested by the Fund. Employees should consider that the Fund will be responsible for travel or other related expenses unless the company or its representative arranges for group travel of interested investors and uses general transportation without providing special services to employees;

2) Employees must maintain the right to be shareholders of the Fund. In this regard, employees are assigned by the Fund following the regulations of the Board of Directors regarding the guidelines for appointing representatives to attend and vote at the shareholders' meetings. Such employees must attend the meeting to vote in the general meeting of shareholders and the extraordinary meeting of shareholders of the company in which the Fund invests every time;

(e) Employees must maintain Members' interests fairly and without discrimination, particularly the allocation of securities between investment plans offered as alternatives to Members. It includes the provision of a quality custodian of the Fund and monitoring and maintaining the benefits members deserve in full;

(f) Employees must regularly supervise and assess the performance of the fund management of financial institutions assigned by the Fund to manage the funds. It aims to ensure that investments are managed under the policies designated by the Fund with prudence and caution;

(2) Investment management with the duty of loyalty as a good professional:

(a) Employees must not engage in any conflict of interest;

(b) Employees must not use inside information for personal gain or for others;

(c) Employees must not engage in any act that directly or indirectly takes advantage of the Fund and its members;

(d) Employees must maintain independence in making investment decisions.

(3) Investment management within the duty of obedience:



(a) Employees must ensure that funds' investments are within the framework of laws, ministerial regulations, ministerial notifications, rules, regulations, announcements, and committee policies;

(b) Employees must regularly study and review their knowledge of laws, ministerial regulations, ministerial notifications, rules, regulations, announcements, and committee policies related to the investment of funds. Employees must have a thorough understanding and be able to practice correctly and strictly. In this regard, to prevent any violation of the law, ministerial regulations, ministry notifications, rules, regulations, announcements, and policies of the said committee that will cause damage to the Fund and damage the reputation of the organization;

(4) Duty of Disclosure:

(a) Employees shall ensure that information disclosed to members or the general public is accurate and disclosed in a transparent, verifiable, and timely manner without delay;

(b) Disclosure Information includes Financial statements and investment information of the Fund, which must be under the accounting standards applicable to the Fund's business;

(c) Employees must ensure that information on the performance of funds presented is accurate, precise, not distorted, and does not cause material misunderstandings to members or the general public.

Clause 10. Code of practice for Preventing Conflict of Interest:

Employees must perform their duties under the principles of preventing conflicts of interest as follows:

(1) Employees must not act or refrain from any act that creates or may cause a conflict of interest between the interests of the Fund and the interests of their own or others;

If there is any doubt that any act or refrain from any act that may conflict with this Code of Conduct for the Prevention of Conflicts of Interest, employees are encouraged to consult with their supervisors or top executives of the Corporate Governance or the Legal before taking action;

(2) For monitoring and protecting employees from conflicts of interest, employees must submit information in the form prescribed by the Fund to the Corporate Compliance Department as follows:





(a) holding ownership of securities of any juristic person more than ten percent, or having the power to bind any juristic person of an employee or family member on the date of commencement of work with the Fund and the date on which such information is changed, within thirty days from the date of commencement of operations with the Fund or the date on which such information has been changed, as the case may be;

(b) Holding of ownership of securities, acquisition of securities, and disposal of securities by employees, family members, or related entities as prescribed in the Government Pension Fund Committee on Securities Transactions of Fund Operators and Family Members Regulations;

(3) Employees must not engage in business, personal activities, or accept jobs in a manner that competes with the Fund;

(4) Employees must not receive a gift or any other benefit intended for the employee to perform duties in favor of the giver of such gift, or any other benefit may be deemed a bribe or an inducement. In this regard, employees must comply with the following rules:

(a) Do not solicit or accept money or anything of value from any person, including business partners, counterparties, asset management companies, securities companies, and service providers to Fund;

(b) cannot accept gifts or other benefits from persons other than relatives or friends with a value exceeding three thousand baht. If the employee cannot avoid it, they may accept the gift or benefit but must report it to the supervisor for consideration as appropriate. If it is deemed inappropriate, the employee shall return such gift or benefit to the giver without delay or deliver such gift or benefit to the Fund for the benefit of the Fund's employees as appropriate;

(5) Employees can travel to meetings, seminars, training, or visits at the invitation of third parties only in cases where it is beneficial to the Fund's operations and arrange group travel of those involved in regular transportation;

(6) Employees should avoid too high or too frequent entertainment. Other employees should also be present if there is a need to attend such receptions;

(7) Employees who are responsible for the procurement and other procurement of the Fund shall comply with the following principles:

(a) act with honesty, fairness, impartiality, and transparency to achieve free and fair competition; cause the most benefit and efficiency and can be checked, and must



concern about the price according to the market mechanism, the quality, and the services received, and do not discriminate or deprive through unjustified means;

(b) not solicit or accept any property or other benefit directly or indirectly from stakeholders in connection with the procurement and any other procurement of the Fund for oneself or others;

Clause 11. Code of practice for Employee Securities Trading:

To prevent employees from trading securities by using inside information and trading securities in a manner that conflicts with the Fund's interests, such as front running or counter-trading with the Fund causing damage to the Fund ( Against the Portfolio), employees must comply with the following rules:

(1) Employees must strictly comply with the regulations of the Government Pension Fund Committee on Securities Transactions of Employees in the Fund and Family Members;

(2) Employees must not allow any person to hold ownership of securities or open a securities trading account on his/her behalf (nominee) or act as a representative of another person in holding securities or opening a securities trading account under any circumstances and whether he or she will benefit from such securities or not;

Clause 12. Code of practice for the protection of the Fund's assets:

(1) Employees must maintain and use the Fund's assets with good common sense and be careful not to lose or deteriorate beyond the normal deterioration of such assets or waste, including using them for the benefit of the Fund and its members only;

(2) Any contributions created by the employee while the employee is working for the Fund and that contribution can be protected by intellectual property rights by law. Such works shall be regarded as intellectual property of the Fund;

Clause 13. Code of practice on Confidentiality of Non-Disclosure Information:

(1) Employees must maintain information that employees know or should know that such information is confidential and that employees have known or received from the operation of the Fund as confidential. It includes information about the investment of funds, confidential business information, personal information of employees, personal information of members, etc;

(2) Employees must strictly comply with the rules and regulations of the Fund stipulating the practice of confidential information and measures to prevent the use of inside information for the benefit of securities trading;



(3) Employees who know confidential information of the Fund, whether through work or by any other means, must not disclose or disseminate such confidential information to any unrelated person, either by writing articles, discussing, or giving advice to others or the general public;

(4) Employees must be careful about leaking confidential information to unrelated persons with the following practices:

(a) If it is necessary to send Fund's confidential information out of the Fund's office by facsimile; electronic mail, photocopy, or by any other means, Employees must ensure that the information submitted is used in the Fund's business and has received prior approval from their supervisors;

(b) It shall provide systematic retention of documentary evidence in the responsible agency, and document evidence of information affecting changes in securities prices should be established from other information;

(5) Employees who become aware of the leak of confidential information of the Fund must promptly notify the supervisor of the Corporate Compliance Department or the registrar of classified information immediately. It intends to solve the incident or damage and prevent such confidential information from spreading further;

(6) Employees shall prevent any confusion or inaccuracies of information that will appear to the public, which will affect the image and reputation of the Fund. In this regard, employees who can disseminate information about the Fund to outsiders and the media, including disseminating information via social media (Social Media) or other information systems in the same manner, as follows:

(a) Secretary-General for information on all aspects of the Fund;

(b) Deputy Secretary-General or Assistant Secretary-General of the Organizational Activities Group for corporate image information;

(c) Deputy Secretary-General or Assistant Secretary-General of Member Relations & Corporate Communication Group for member-related information;

(d) Deputy Secretary-General or Assistant Secretary-General of the Fund Management Group or a senior director assigned by the Secretary-General on a case-by-case basis for information about the investment of fund;

(7) Employees who are not obligated to disseminate information about the Fund must comply with the followings:



(a) Employees may provide information or coordinate their contacts with external agencies only if they are directly responsible for or are assigned to be the contact person for that aspect of the Fund. But if external entities contact with questions that are not relevant to one's operations, employees are prohibited from providing information or commenting on the matter. They must report to the secretary-general or supervisor to assign directly involved employees;

(b) Employees are prohibited from providing information or expressing opinions affecting the Fund by contacting the press and expressing public opinion. In the event of a media contact for information, it is advisable to contact the designated employee directly. If in doubt as to who should be contacted, consult a supervisor or top management of the Governance or the Legal Department;

Clause 14. Code of Practice for Member Complaints:

When receiving complaints from members, there must be an investigation to find the cause and resolve the problems that arise without delay in accordance with the complaints response process in the information service to members. It is for the benefit of correcting deficiencies in the work system or performing duties of employees. It also explains the reasons for the operation, considering the laws and regulations, transparency, and fairness to all parties based on general business practice standards. When it appears that the investigation of the complaint has been terminated, the Fund must notify the complaining member of the result as soon as possible.

Suppose a complaint from a member causes the Fund to take legal action or disciplinary action against any employee. In that case, the Fund shall expeditiously proceed under the relevant laws, rules, and regulations.

Clause 15. Whistleblowing of suspected acts of violation or corruption:

(1) If an employee is aware of an act suspected of breaking or violating the law, rule, regulation, or code of conduct or constitutes a fraudulent act, the employee shall report such act directly to the Chairman of the Audit Sub-Committee. This whistleblowing will be protected as strict confidentiality;

(2) When the Chairman of the audit sub-committee receives such clues, it shall consider ordering the Internal Audit Office to investigate the facts and report the results to the Audit Sub-Committee for consideration as soon as possible. In the performance of duties of the Internal Audit Office, it shall be carried out confidentially, and with due regard to rules, transparency and fairness to the accused person shall be taken into account;



(3) When the Audit Sub-Committee receives a fact-finding report from the Internal Audit Office and considers that there has been an act that may violate or violate laws, rules, regulations, codes of conduct, or constitute a fraudulent act. It shall notify the committee or the secretary-general to act following the relevant laws, rules, and regulations as soon as possible. In this regard, the Internal Audit Office will follow up on the results of the operation and report to the Audit Sub-Committee for acknowledgment;

Clause 1 6 . Violation of the Code of Conduct as stipulated in this regulation shall determine the liability of the employee by taking into account the following facts:

(1) Behavior of the violation, intent, motive, and importance of the violation of the Code of Conduct;

(2 ) position, duties, responsibilities, age, history, and past behavior of the employee;

(3) adverse consequences and damage caused by violations;

(4) other material matters that should be taken into consideration;

Clause 1 7 . In the event of a problem related to the implementation of this Notification, the Secretary-General shall decide, and the Secretary-General's decision shall be final.

Announced on the 11 Day of August B.E. 2561(2018)

(signature)

(Mr. Vitai Ratanakorn)

Secretary-General of the Government Pension Fund