

HANA Microelectronics Public Co., Ltd.

BUSINESS CODE OF CONDUCT OF THE BOARD OF DIRECTORS

By Board of Directors
Revision: 23 February 2017

Message from the Chairman:

The Business Code of Conduct of the Board of Directors of the Company is established for the directors as a part of compliance of corporate governance. The Code represents our principles and our expectation that our directors will act ethically for the benefit of the company, shareholders, employees and other stakeholders.

All of us must behave according to the essence and language of this Code, in addition to avoiding any behavior that could appear unethical. Each director of Hana is expected to read the Code thoroughly, adhere to both the intent and the ground of what it says, and use it as a guide to make the right decisions.

A handwritten signature in black ink, appearing to read 'John Thompson', is centered on a light blue rectangular background.

John Thompson
Chairman of the Board of Directors

I. POLICY OVERVIEW

This Code of Conduct sets forth the general expectations of the Company for its Board of Directors, and describes standards of ethical behavior that each director is expected to uphold.

II. OBJECTIVES

The objectives of this policy are to guide behavior, enhance our stakeholder's confidence in the Company and demonstrate the commitment of the Directors to ethical standards and practices.

III. BUSIENSS CODE OF CONDUCT OF DIRECTORS

1. Exercise due care, honesty and integrity

The Company expects all directors to exercise good judgment and perform their duties with honesty and good faith in the best interest of the Company. They are expected to act with the due care and prudence, which an ordinary person undertakes the like business under the similar circumstances.

2. Conflict of Interests

Directors must not take improper advantage of the position as a director to gain, directly or indirectly, a personal advantage or an advantage for any associated person. They shall disclose any benefits from personal business as well as any issue that may conflict with the Company's benefit or may cause a conflict of interest to the Company.

3. Use of the Company Information

Directors must not use information that is obtained as a director in an improper manner. The insider trading is prohibited. The director must report properly and timely any transactions of the Company securities' holdings to the board in addition to reporting to the Securities Exchange Commission (SEC) and the Stock Exchange of Thailand's regulation. The directors who may gain the insider information should avoid trading the Company's securities for the period of one month before the Company announces its financial statements to the public and at least 24 hours after the information is widely spread out to the public. The board and executives shall inform to the board or the company's secretary at least 1 day in advance before actual trading of the company's securities.

The director must not disclose matters such as trade secrets, or sensitive business information to outsiders and must not provide to anyone any information which is not publicly available and which would have a material effect on the price or value of the company's securities.

4. Interests of legitimate stakeholders

In making decisions on behalf of the Company, Directors shall respect and have regard to the best interests of legitimate stakeholders in the Company, including its shareholders, employees, customers, clients, partners and suppliers.

5. Legal Compliance

Directors must comply with the applicable laws in the strictly-practices, transparent and responsible manner. Directors shall not accept any offer, gift or anything of value from customers, suppliers, shareholders and stakeholders that is perceived as intended to influence any business decision, any act or failure to act or any commission of fraud.

6. Commitment to Anti-corruption policy and programme

Hana has a zero tolerance of bribery and corruption. The company prohibits the board of directors, management and employees involved in any act of corruption in any form in all business transactions to benefit directly or indirectly even through their family, friends and acquaintances whether receiving, accepting, giving, offering, proposing, or demanding either in monetary or non-monetary form to the government, agency, person, public or private company where the company conducts the business with, and shall comply with the applicable laws and regulations in all the countries in which the company operates.

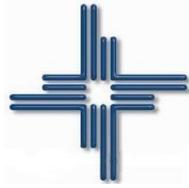
7. Giving Equal Opportunity to Shareholders

Directors must protect the rights of shareholders in accordance with the trust given to the directors by the shareholders. Board of Directors shall not make a decision that could give undue benefit to a shareholder or another person at the expense of the company or another shareholder.

8. Ensuring Compliance and Revision

Code of Business Conduct is applied to the Board of Directors of the Company who shall fully understand and strictly adhere with its principles. Directors shall confirm with the Code on an annual basis.

In accordance with the business environment change, the Company shall revise its Code of Conduct for the directors as deemed appropriated. The Company Secretary shall monitor compliance of the Code as and when there is the change of the Directors.



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DIRECTOR CONFIRMATION TO THE CODE OF CONDUCT

I have received and read this Code of Conduct for Directors. I understand and will comply with this Code of Conduct outlined to the highest possible standard.

Signature: _____

Name: _____

Date: _____

(To be filing by the Company Secretary)