
Supplier Code of Conduct

Original (November 2025)

Singha Estate Public Company Limited

Prepared by	The procurement function of each respective business unit
Endorsed by	Corporate Governance and Sustainable Development Committee
Approved by	Board of Directors

Document Revision History

Date	Revision	Page Number	Revision Details	Requestor
12 November 2025	Original	-	-	-

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1. Introduction

Singha Estate Public Company Limited (the “Company” or “Singha Estate”) and its subsidiaries have established this Supplier Code of Conduct to serve as a comprehensive framework, guiding our business partners toward the adoption of responsible operational practices. This initiative is designed to foster a “Harmonious Coexistence” between economic prosperity, social equity, and environmental stewardship, thereby institutionalizing the "Singha Estate Standard." Ultimately, this code aims to facilitate the collective attainment of sustainable development goals across the entirety of our business value chain.

2. Policy Objectives

The primary objective of this Policy is to establish a standardized framework for business partners to study and adhere to throughout the duration of the professional engagement. By adapting and implementing these guidelines as appropriate, business partners ensure that operational processes between S Group and its suppliers remain strictly aligned. Furthermore, S Group encourages its partners to adopt this Supplier Code of Conduct as a cornerstone of their own corporate governance and to extend these principles to their own respective suppliers. Such alignment serves as a vital mechanism for the enhancement of overall value chain efficiency.

3. Scope of Policy

This Supplier Code of Conduct is universally applicable to all suppliers, contractors, and service providers engaged in the provision of goods or services to S Group.

4. Definitions

Any term or phrase within this Supplier Code of Conduct shall be construed according to the definitions provided below, unless the context expressly dictates otherwise.

Term / Phrase	Definition
S Group	The Company and its subsidiaries.
Director	A director of the Company's Board of Directors.

Term / Phrase	Definition
Supplier	Any manufacturer, vendor, or service provider within S Group's supply chain, including direct counterparts (e.g., consultants, contractors, distributors) and indirect counterparts (e.g., subcontractors), as well as any related organizations or individuals.
The Company / Singha Estate	Singha Estate Public Company Limited
Subsidiary	A company in which the Company maintains direct and/or indirect shareholding exceeding 50 percent, or over which the Company exercises controlling interest.

5. Roles

Accountable Party	Roles and Responsibilities
The Procurement Function of each Business Unit	<ul style="list-style-type: none"> ● Perform a formal review of the Supplier Code of Conduct at least once annually. ● Disseminate the Supplier Code of Conduct to business partners and advocate for their adherence to these standards. ● Coordinate with and provide requisite guidance to suppliers regarding compliance with this Supplier Code of Conduct. ● Monitor the business practices of suppliers to ensure sustained alignment with the Company's Supplier Code of Conduct.
Supplier	<ul style="list-style-type: none"> ● Acknowledge the principles set forth in the Supplier Code of Conduct. ● Cooperate in conducting business operations in accordance

Accountable Party	Roles and Responsibilities
	with the guidelines established herein.

6. Supplier Code of Conduct Guidelines

6.1 Regulatory Compliance

Suppliers shall adhere to all applicable laws and regulations of the jurisdictions in which they operate, while upholding the principles of business ethics and integrity.

6.2 Privacy, Confidentiality, and Intellectual Property

6.2.1 Suppliers must comply with all laws and treaties pertaining to intellectual property, patents, and trademarks, and shall refrain from unauthorized dissemination or infringement of the intellectual property rights of third parties.

6.2.2 Suppliers granted access to material non-public information, intellectual property, or confidential data concerning S Group and its stakeholders through their engagement must not disclose, exchange, sell, or transfer such data. Suppliers are obligated to protect this information even after the business relationship has terminated and shall cooperate in executing formal written non-disclosure agreements upon request.

6.3 Anti-fraud and Anti-corruption

6.3.1 Suppliers must strictly comply with all laws and regulations regarding anti-corruption, anti-bribery, fraud, and other prohibited business practices.

6.3.2 Suppliers shall not offer, promise, accept, or provide assets, gifts, or any other benefits that constitute bribery, whether directly or indirectly, to any relevant parties.

6.3.3 The Company encourages Suppliers to adopt the Company's Anti-fraud and Anti-corruption Policy—including guidelines on political contributions, charitable donations, sponsorships, and the giving/receiving of gifts or hospitality—as their own operational standards. Suppliers must cooperate with and adhere to all anti-corruption measures prescribed by the Company.

6.4 Conflict of Interest

6.4.1 Suppliers must not seek personal gain or provide undue benefits to associates by exploiting their position, duties, or opportunities arising from their engagement with S Group.

6.4.2 Suppliers shall cooperate in disclosing any information, transactions, or circumstances that may constitute a potential or actual conflict of interest.

6.5 Responsible Sourcing and Delivery

6.5.1 Suppliers must treat competitors within the framework of fair competition and abstain from any actions that negatively impact competitors or S Group.

6.5.2 Suppliers shall not seek confidential information from competitors through dishonest or inappropriate means for the purpose of facilitating transactions with S Group.

6.5.3 The Company advocates for responsible procurement throughout the supply chain, encouraging the use of high-quality local raw materials or products where appropriate. Suppliers must not source materials from origins linked to illegal activities, human rights violations, or socially and environmentally irresponsible practices.

6.5.4 Suppliers must implement measures to address errors to the best of their ability and cooperate with the Company's audits if defects in goods or services are discovered post-delivery that cause damage to S Group or its clients.

6.5.5 Suppliers must maintain contingency plans for goods and service provision during crises or emergencies to mitigate operational disruptions.

6.6 Respect for Human Rights

6.6.1 Suppliers shall conduct business with respect for the human rights of their stakeholders, referencing the Company's Human Rights Policy and/or relevant international human rights standards.

6.6.2 Suppliers must recognize equal human dignity and ensure fair treatment and non-

discrimination toward employees, local or indigenous communities, vulnerable groups, or other stakeholders, regardless of physical differences, race, nationality, religion, gender, age, education, or any other legally protected status.

6.7 Fair Labor Practices

- 6.7.1 Illegal labor is strictly prohibited. If employing migrant workers, Suppliers must ensure full legal compliance and permit audits upon request.
- 6.7.2 Suppliers shall operate without the use of child labor below the minimum age established by the laws of the respective country.
- 6.7.3 Suppliers must not engage in or benefit from forced or abused labor, including threats, intimidation, harassment, human trafficking, or any form of labor exploitation.
- 6.7.4 Suppliers must not terminate, demote, or reduce the benefits of female employees due to pregnancy and must provide all legally mandated protections.
- 6.7.5 Suppliers shall not violate, threaten, or use corporal or psychological punishment or violence against employees and must prevent all forms of harassment, including sexual harassment.
- 6.7.6 Suppliers must provide wages and compensation at least in line with the local minimum wage or living wage, as applicable, ensuring it is sufficient for living and fair relative to the nature and duration of work, alongside providing statutory rest periods, benefits and leave.
- 6.7.7 Suppliers shall establish employee working hours in compliance with applicable labor protection laws and relevant regulations of each respective country or region in which the Supplier operates. Furthermore, Suppliers shall encourage employees to complete their work within standard working hours to minimize the necessity for overtime and/or excessive working hours. In the event that overtime work is required, the Supplier is obligated to provide compensation at the rates and according to the criteria prescribed by the applicable laws on labor protection.

- 6.7.8 Suppliers shall strictly adhere to the prescribed legal procedures for the termination of employment in accordance with laws on labor protection and must refrain from terminating any employment contract without fair and justifiable grounds.
- 6.7.9 Suppliers shall support the right to freedom of association for employees to organize constructive activities, provided that such actions do not cause a nuisance to others or contravene applicable principles and local laws. Furthermore, Suppliers shall support employee representatives in their roles involving negotiation, the exchange of views, and participation in collective bargaining aimed at enhancing the quality of work-life, in alignment with the local laws and regulations of each respective country or region in which the Supplier operates.
- 6.8 Occupational Health and Safety
- 6.8.1 Suppliers shall comply with all applicable laws, regulations, ordinances, and recognized standards regarding occupational health and safety. Furthermore, Suppliers shall acknowledge and adopt the Company's Occupational Health, Safety, and Environment Policy as an operational guideline, as appropriate.
- 6.8.2 Suppliers must provide a safe working environment and equipment that adheres to occupational health and safety principles. Such provisions must be in accordance with the laws of the country in which the Supplier operates and must meet recognized industry standards.
- 6.8.3 Suppliers shall maintain robust occupational health and safety standards throughout their operational processes. This includes not neglecting or ignoring any acts or workplace defects that may compromise employee safety. Furthermore, Suppliers shall implement monitoring, tracking, recording, and reporting mechanisms to ensure that operations remain hygienic, secure, and result in minimal social impact.
- 6.8.4 Should any occupational health and safety risks arise that may impact the business operations of the Supplier or the Company, the Supplier is required to report the proposed preventive and corrective measures to the Company. The Supplier must be prepared to

implement prevention, correction, and immediate remediation for any potential social impacts.

6.8.5 Suppliers shall provide communication and training programs to foster awareness among their employees regarding occupational health and safety, with the ultimate objective of reducing the rates of occupational illness, accidents, and fatalities.

6.9 Environmental Management

6.9.1 Suppliers shall assess significant environmental impacts that may arise from or affect their business operations. Suppliers are mandated to comply with all relevant laws, rules, regulations, and recognized standards to prevent, rectify, and minimize environmental impacts.

6.9.2 The Company encourages Suppliers to operate with the highest regard for natural resource stewardship and efficiency, encompassing energy use, water use, waste reduction within premises, and the abatement of greenhouse gas emissions (GHG Emission). This includes participation in climate change mitigation and the reduction of environmental footprints through the 4R framework: Rethink (maximizing utility), Reduce (minimizing consumption), Reuse, and Recycle.

6.9.3 The Company supports Supplier engagement in the conservation and preservation of biodiversity, including the prohibition of encroachment or deforestation in forest areas, to protect and maintain ecological equilibrium.

6.9.4 The Company promotes the adoption of eco-friendly products, services, and/or business processes, such as:

- Environmentally friendly logistics and transportation.
- Management of pollution and environmental impacts, such as waste minimization through reuse, recycling, and/or appropriate waste segregation and disposal.
- Implementation of take-back schemes for packaging or equipment.

- Operations aligned with circular economy principles.
- Utilization of local raw materials or products.
- Local community employment initiatives.

6.9.5 The Company encourages Suppliers to obtain recognized sustainability certifications or labeling relevant to their products, services, and/or business processes.

6.10 Social and Community Engagement

6.10.1 Suppliers shall conduct their business operations with due consideration for potential impacts on local communities and the surrounding society. Furthermore, Suppliers are expected to contribute to the enhancement of the quality of life and the advancement of social welfare within Thai society.

6.10.2 Suppliers must establish dedicated functions and operational plans to manage community grievances. This includes providing accessible channels for receiving community complaints to effectively mitigate any adverse impacts arising from the Supplier's business operations.

6.11 Monitoring and Evaluation

6.11.1 The Company encourages Suppliers to express their views through the various channels provided by the Company. This initiative ensures the organization receives valuable insights, enabling the integration of Supplier feedback into the ongoing development of bilateral operational processes.

6.11.2 To ensure operational transparency, Suppliers are required to maintain orderly and systematic records of financial statements and all other material documentation.

6.11.3 The Company advocates for Suppliers to monitor and evaluate their own performance in accordance with this Policy, including the rigorous recording and reporting of results. Furthermore, Suppliers must provide full cooperation to the Company in the event of a formal performance assessment conducted under this Policy.

6.11.4 The Company reserves the right to review any Supplier actions and maintains the right to terminate employment or engagement immediately if it is factually established and proven that the Supplier has violated any part, or the entirety, of the guidelines upheld by the Company.

7. Whistleblowing and Grievance Channels

Suppliers or any stakeholder groups of Singha Estate who wish to seek information, report whistleblowing leads, or file grievances regarding breaches of ethics, improper conduct, misconduct, or actions in contravention of the law, may submit such reports along with supporting evidence through the following contact channels:

Channel 1 By postal mail

Complaints can be addressed to
The Chairman of the Audit Committee or the Group Internal Audit
and Compliance Department
Singha Estate Public Company Limited
123 Suntowers Building B, 40th floor, Vibhavadi-Rangsit Road, Chom
Phon, Chatuchak, Bangkok 10900

Channel 2 By electronic mail

Complaints can be emailed to the Chairman of the Audit Committee
or the Group Internal Audit and Compliance Department at
compliance@singhaestate.co.th

Channel 3 Via the Company's website

www.singhaestate.co.th >> Investor Relations >> Corporate
Governance >> Ways to Report

8. Policy Review

The accountable department is responsible for reviewing the Supplier Code of Conduct on an annual basis, or upon the occurrence of any material changes, to submit for endorsement by the

Corporate Governance and Sustainable Development Committee and subsequently for approval by the Board of Directors, respectively.

Announced on 12 November 2025

(Mr. Petipong Pungbun Na Ayudhya)
Chairman of the Board of Directors
Singha Estate Public Company Limited