


(Unofficial translation)


 <b>SINGHA ESTATE</b>	Procedures: <b>Supplier Code of Conduct</b>	
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**Procedures  
of  
Supplier Code of Conduct**

Singha Estate Public Company Limited and its subsidiaries (the "**Company**") have developed this Supplier Code of Conduct and guidelines for its suppliers. This document is intended to serve as a framework for our suppliers to conduct their business responsibly and to create a harmonious coexistence among economic, social, and environmental dimensions. By doing so, we aim to establish the "Singha Estate Standard" and achieve shared sustainable development goals throughout the entire business value chain.


	Name - Position	Signature	Date
Prepared by	Khun Kwanchanok Thavaravon Senior Manager - Corporate Procurement Department	- Signature -	14.02.25
Reviewed by	Khun Jakpanee Sothornnopabutr First Vice President – Corporate Procurement Department	- Signature -	14.02.25
Approved by	Khun Thitima Rungkwansiroj Chief Executive Officer	- Signature -	17.02.25

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#### Review/Revision Records

Date	Issue No.	Page Number	Review/Revision Details	Proposed by
1 October 2021	Original	-	-	-
14 February 2025	Revision 1	4 4 5 - 10	<ul style="list-style-type: none"><li>- Added roles and responsibilities</li><li>- Added definitions</li><li>- Added details on anti-bribery and anti-corruption in Clauses 5.3.2, 5.3.3, and 5.3.4</li><li>- Added details on fair labor treatment in Clause 5.7.3</li><li>- Revised the "Community and Environmental Management" section to Clause 5 . 9 "Environmental Management" and Clause 5.10 "Social and Community Participation"</li></ul>	Corporate Procurement Department

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## 1. Objective

To establish guidelines for suppliers to study and follow when working with the Company throughout the partnership, and to apply them as appropriate. This will ensure that business processes and standards between the Company and its suppliers are aligned. It also aims to encourage suppliers to use this Supplier Code of Conduct as a principle for sound corporate management and to apply similar practices to their partners. This is considered a crucial mechanism for effective supply chain management.

## 2. Scope


The scope of this Supplier Code of Conduct applies to all suppliers that provide goods or services to the Company.

## 3. Definitions

Term	Definition
Supplier	A manufacturer or provider of goods or services within the Company's supply chain, including both direct contacts (e.g., consultants, contractors, distributors) and indirect contacts (e.g., subcontractors), as well as any other related organizations or individuals.

## 4. Roles and Responsibilities

Responsible Party	Roles and Responsibilities
Corporate Procurement Department	<ul style="list-style-type: none"><li>● Review the Supplier Code of Conduct regularly, at least once a year</li><li>● Communicate this Supplier Code of Conduct to Suppliers and encourage their compliance</li></ul>
Supplier	<ul style="list-style-type: none"><li>● Acknowledge the Supplier Code of Conduct</li></ul>

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Responsible Party	Roles and Responsibilities
	<ul style="list-style-type: none"><li>Cooperate in conducting business in line with the guidelines specified in the Supplier Code of Conduct</li></ul>

## 5. Guidelines

### 5.1 Compliance with Laws and Regulations

5.1.1 Suppliers shall comply with all applicable laws and regulations of the countries in which they operate, and adhere to the principles of ethics and fairness in conducting their business.

### 5.2 Privacy, Confidentiality, and Intellectual Property


5.2.1 Suppliers shall comply with all laws and treaties related to intellectual property, patents, and trademarks. They must not distribute or infringe upon the intellectual property of others without proper authorization.

5.2.2 Any Supplier who gains access to the Company's sensitive business information, intellectual property, or confidential stakeholder data during the course of the business relationship must not disclose, exchange, sell, or transfer that information. This obligation to protect and safeguard the data remains in effect even after the termination of the business relationship with the Company. Furthermore, Suppliers are required to cooperate with the Company in executing a formal, written confidentiality agreement upon request.

### 5.3 Anti-Bribery and Corruption

5.3.1 Suppliers shall comply with all applicable laws and regulations concerning anti-corruption, bribery, fraud, and other prohibited business practices.

5.3.2 Suppliers must not offer, promise, accept, or give any assets, gifts, or other benefits—either directly or indirectly—to any related individuals.

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5.3.3 The Company encourages its Suppliers to adopt its own Anti-fraud and Anti-corruption Policy, which includes guidelines on political assistance, charitable donations, and financial support. These guidelines should be followed by the Suppliers' directors, executives, and employees.

5.3.4 Suppliers must comply with the Company's anti-fraud and anti-corruption guidelines and cooperate with all related requirements and policies announced by the Company, such as the "No Gift Policy" and the "Anti-fraud and Anti-corruption Policy."

#### 5.4 Conflict of Interest

5.4.1 Suppliers shall not pursue personal gain or provide benefits to their close associates through their position, duties, or any opportunities that arise from working with the Company.


5.4.2 Suppliers are required to cooperate by disclosing any transactions or circumstances that may constitute a conflict of interest.

#### 5.5 Responsible Sourcing and Delivery

5.5.1 Suppliers must treat competitors fairly within the framework of ethical competition and must refrain from any actions that could negatively affect competitors or the Company.

5.5.2 Suppliers shall not seek confidential competitor information or any other data through dishonest or improper methods for the purpose of a transaction or to gain an undue advantage in a transaction with the Company.

5.5.3 The Company encourages Suppliers to practice responsible sourcing of goods and services throughout their entire supply chain. This includes, where appropriate, using local materials or products that meet high standards of quality. Suppliers are strictly prohibited from sourcing raw materials or components from origins linked to illegal activities, human rights abuses, or a disregard for social and environmental responsibility.

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5.5.4 Suppliers must implement measures and guidelines to take full responsibility for and rectify any errors. This includes cooperating with the Company on any necessary investigations should a defect in their goods or services be discovered after delivery, leading to damages for the Company or its customers.

5.5.5 Suppliers are required to have a contingency plan in place for sourcing goods or services during a crisis or emergency to mitigate any disruption to collaborative operations.

## 5.6 Respect for Human Rights

5.6.1 Suppliers shall conduct their business with respect for the human rights of their stakeholders. This should be guided by the Company's Human Rights Policy and/or other relevant international human rights guidelines.


5.6.2 Suppliers must operate without the use of child labor, as defined by the minimum legal age in each country where they operate.

5.6.3 Suppliers must not engage in or profit from forced labor or abused labor, including any form of threat, coercion, harassment, human trafficking, or exploitation of workers.

5.6.4 Suppliers must recognize and respect the equal dignity of all human beings, practicing equality and fair treatment without discrimination toward employees, workers, local communities, indigenous peoples, vulnerable groups, or any other stakeholders. This includes discrimination based on physical characteristics, race, nationality, religion, gender, age, education, or any other reason defined by the laws of the country in which the Supplier operates. This principle applies throughout the entire employment contract.

## 5.7 Fair Treatment of Labor

5.7.1 Suppliers shall provide appropriate and fair wages and compensation to their employees and workers, based on the nature and duration of their work. They must also grant designated rest

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periods, holidays, and leave, and ensure that all due benefits are paid on time, in accordance with the law.

5.7.2 Suppliers are prohibited from hiring illegal labor. In the case of foreign workers, Suppliers must ensure that the employment is in full compliance with the laws of the country where they operate, and they must consent to inspections upon request.

5.7.3 Suppliers must follow legal procedures for employee termination and must not terminate an employment contract without just cause.

#### 5.8 Occupational Health and Safety


5.8.1 Suppliers shall comply with all applicable laws, regulations, and recognized standards for occupational health and safety. They must also acknowledge and, where appropriate, use the Company's Occupational Health, Safety, and Environment Policy as a guiding framework for their operations.

5.8.2 Suppliers must provide a safe working environment and secure equipment that meets occupational health and safety principles, as mandated by the laws of the country in which they operate and as per recognized standards.

5.8.3 Suppliers are required to maintain a high standard of occupational health and safety throughout all work processes. This includes a commitment not to overlook or ignore any actions or defects in the workplace that could pose a risk to employees. Suppliers must also implement a system for monitoring, recording, and reporting their operations to ensure they are hygienic, safe, and have minimal impact on society.

5.8.4 If any occupational health and safety issues arise that could pose a risk to the business operations of both the Supplier and the Company, the Supplier must immediately report their prevention and resolution plans to the Company. They must also be ready to promptly implement



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measures to prevent, remedy, and mitigate any potential social impacts.

## 5.9 Environmental Management


5.9.1 Suppliers must consider the significant community and environmental impacts that may arise from their business operations. They shall comply with all relevant and recognized laws, regulations, and standards to prevent, correct, and minimize environmental impacts.

5.9.2 The Company encourages Suppliers to operate with maximum efficiency in their use of natural resources, including energy and water, and to reduce waste at their facilities. This also involves participating in efforts to mitigate climate change and minimize environmental impacts by following the 4R principles: Rethink, Reduce, Reuse, and Recycle.

5.9.3 The Company encourages Suppliers to participate in the conservation and preservation of biodiversity. This includes not encroaching on or cutting down trees in forested areas to protect and maintain the balance of the ecosystem.

5.9.4 The Company promotes the use of environmentally friendly products, services, and/or business processes by its Suppliers, such as:

- Eco-friendly transportation
- Managing pollution and environmental impacts (e.g., reducing waste generation by considering reuse, recycling, and/or proper sorting and disposal)
- Accepting returnable packaging or shipping materials
- Implementing practices related to a circular economy
- Using local raw materials or products
- Hiring from the local community

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5.9.5 The Company encourages Suppliers to obtain relevant sustainability certifications or labels for their products, services, and/or business processes.

#### 5.10 Participation in Developing Society and Community

5.10.1 Suppliers shall conduct their business with consideration for potential impacts on surrounding communities and society. They must also participate in developing and improving the quality of life for Thai society.

#### 5.11 Monitoring and Evaluation

5.11.1 The Company encourages Suppliers to provide feedback through the channels provided. The Company will use this feedback to improve collaborative work processes.


5.11.2 For the sake of operational transparency, Suppliers must maintain all financial and critical documents in an orderly manner.

5.11.3 The Company encourages Suppliers to implement the guidelines in this document. Suppliers should monitor, evaluate, and report on their own performance. They must also cooperate with the Company by providing the results of these evaluations upon request.

5.11.4 The Company reserves the right to take action against any Supplier, including immediate termination of the contract, if it finds and can prove that the Suppliers has violated any part or all of the Company's guidelines.

### 6. Whistleblowing Channel

Suppliers or other Singha Estate's stakeholders who wish to inquire about information, report a tip, or file a complaint regarding a violation of the Code of Conduct, improper or illegal behavior, can do so by submitting details and evidence through the following contact channels:

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**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 Sun Towers Building B, 40<sup>th</sup> 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](mailto:compliance@singhaestate.co.th)

**Channel 3    Via the Company's website**

[www.singhaestate.co.th](http://www.singhaestate.co.th) >> Investor Relations >> Corporate Governance >>  
Ways to Report

**7.        Review**

The Corporate Procurement Department is responsible for reviewing the Supplier Code of Conduct in the event of significant changes.