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## Supplier Code of Conduct and Ethics

The Board of Directors of Neo Corporate Public Company Limited is committed to conducting business with integrity, recognizing the importance of ethical practices, social responsibility, and the treatment of suppliers and business partners in accordance with principles of good corporate governance. The Company emphasizes transparency and accountability at all times, as well as strict compliance with all applicable laws and regulations.


The Company also ensures that relevant documents are translated into local languages where necessary, in order to ensure that the principles of this Code of Conduct are effectively communicated to suppliers and business partners worldwide. Accordingly, the Company has established this Supplier Code of Conduct to provide clear guidance for suppliers and business partners. This Code covers key principles of ethical business conduct, including integrity in operations, adherence to international standards on labor practices, employee health and safety, and environmental management. The Company will provide support, encouragement, and collaboration to enable its suppliers and business partners to operate in alignment with these ethical standards. Monitoring and evaluation mechanisms will also be implemented to ensure that this Supplier Code of Conduct is effectively complied with.

If any business partner fails to comply with this Code of Conduct, the Company reserves the right to take appropriate actions, including reconsidering business engagements, considering the potential impacts and damages arising from such non-compliance.

### Purpose and Scope

The Company expects its suppliers and business partners—including contractors, consultants, agents, and service providers engaged in the supply of goods and services or in conducting business with the Company's personnel—to demonstrate a shared commitment to strict compliance with this Supplier Code of Conduct. Suppliers and business partners are expected to conduct their operations with responsibility, integrity, honesty, and transparency, and to cooperate in supporting the Company's anti-corruption and anti-bribery practices. The Company also expects suppliers and business partners to report any actions that may be suspected of violating this Code of Conduct through the contact channels specified in the appendix.

This Supplier Code of Conduct shall be effective from **1 June 2026** onwards.

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**Section 1:**

**Labor and Human Rights**

The Company places importance on workforce diversity and expects its suppliers and business partners to uphold the same principle. Suppliers and business partners shall adopt and comply with policies that promote respect, dignity, and equal treatment in the workplace, and shall recruit, employ, and retain personnel based on merit at all levels of the organization without discrimination on the basis of nationality, race, religion, gender, sexual orientation, ethnicity, age, disability, or military status.

**Labor Protection**

- Suppliers and business partners must support and respect the human rights of their employees and treat them with dignity and respect in accordance with internationally recognized standards. This applies to all employees, including temporary workers, migrant workers, students, contract workers, directly employed personnel, and any other types of workers.
- The use of child labor is strictly prohibited at any stage of operations. Suppliers and business partners must comply with all applicable laws and regulations relating to employment in the countries in which they operate, including maintaining appropriate documentation and verification systems to confirm the age of employees.
- Female employees must not be required to perform work that could endanger their health or safety. Pregnant employees must be provided with appropriate protection and benefits in accordance with applicable laws.


**Non-Discrimination**

Suppliers and business partners must not engage in any form of discrimination in hiring or employment practices, including with respect to compensation, promotion, rewards, training opportunities, or termination, based on nationality, race, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, or marital status.

Employees and job applicants must not be subjected to medical examinations (including pregnancy testing) that could be used in a discriminatory manner. Employees with disabilities must be provided with appropriate workplace accommodations to enable them to perform their duties effectively.

**Fair Treatment**

Suppliers and business partners shall establish and maintain a workplace free from harassment and abuse. Workers must not be subjected to any form of inhumane or degrading treatment, including but not limited to sexual

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harassment, sexual abuse, corporal punishment, mental or physical coercion, verbal abuse, threats, or unjustified restrictions on freedom of movement within or outside the workplace.

### Freely Chosen Employment

Suppliers and business partners shall ensure that all work is undertaken on a voluntary basis. The use of forced, bonded, or involuntary labor, including debt bondage or prison labor, is strictly prohibited in any form. Workers shall have the right to leave employment upon reasonable notice as required by applicable laws. Suppliers and business partners shall not retain workers' identity documents, passports, or work permits as a condition of employment, whether directly or through third parties.

### Working Hours

Suppliers and business partners shall comply with all applicable laws and regulations governing working hours, including normal working hours and overtime. Suppliers and business partners shall establish policies and procedures to prevent, monitor, and reduce excessive working hours. Working hours shall not exceed:

- 8 hours per day or 48 hours per week under normal working conditions; and
- 7 hours per day or 42 hours per week for work involving hazardous conditions.

Workers shall be provided with at least one day off in every seven-day period.

### Wages and Benefits


Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime pay, and legally mandated benefits.

Wages shall be paid in a timely manner and in accordance with applicable payroll documentation or equivalent records. Suppliers and business partners are encouraged to provide wages that meet or exceed the legal minimum and to progressively support the payment of a living wage, in order to contribute to improving workers' quality of life.

### Freedom of Association

Suppliers and business partners shall respect workers' rights to freely associate, form or join trade unions, and engage in collective bargaining, in accordance with applicable laws.

Workers shall be able to communicate openly with management regarding working conditions without fear of retaliation, intimidation, or harassment.

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**Section 2:**

**Health, Occupational Hygiene, and Safety**

Suppliers and business partners shall provide and maintain a safe and hygienic working environment appropriate to their business operations with applicable local laws.

**Workplace Safety**

Suppliers and business partners shall protect workers from exposure to hazards arising from chemical, biological, and physical risks, including risks associated with physically demanding tasks and workplace infrastructure. Appropriate systems, operating procedures, preventive maintenance, and necessary engineering controls shall be established and implemented to minimize risks to health and safety in the workplace. Where hazards cannot be adequately controlled by such measures, suppliers and business partners shall provide suitable and sufficient personal protective equipment (PPE) to workers and ensure its proper use.

**Emergency Preparedness and Response**

Suppliers and business partners shall establish procedures to respond to emergency situations and implement systems for monitoring and reporting work-related incidents, injuries, and illnesses.


Such measures shall include, but are not limited to:

- emergency reporting procedures,
- evacuation plans and warning systems,
- employee training and regular drills,
- appropriate fire detection and firefighting equipment,
- adequate emergency exits, and
- recovery and business continuity plans.

**Occupational Injury and Illness Management**

Suppliers and business partners shall establish procedures and systems to prevent, manage, monitor, and report occupational injuries and illnesses. These shall include:

- encouraging workers to report incidents,
- recording and classifying cases of injury and illness,
- providing appropriate medical treatment,
- investigating incidents and implementing corrective actions to address root causes, and
- supporting workers in returning to work following injury or illness.

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**Physically Demanding Work**

Suppliers and business partners shall identify, assess, and manage risks associated with physically demanding work. Such activities include manual handling of materials, heavy lifting, repetitive tasks, prolonged standing, and assembly work requiring repetitive force. Where appropriate, suppliers and business partners should implement suitable control measures, including the use of mechanization or automation, to reduce the risk of injury arising from prolonged or repetitive activities.

**Hygiene, Food, and Accommodation**

Suppliers and business partners shall provide workers with access to clean toilet facilities, safe drinking water, and hygienic food storage and eating areas, where applicable. Where accommodation is provided, it shall be clean, safe, and meet basic living standards. Such facilities shall include:

- adequate emergency exits,
- appropriate heating and ventilation systems,
- sufficient personal space, and
- reasonable freedom of movement, including the right to leave the premises when appropriate.

**Section 3:  
Environment**

**Environmental Responsibility**


The Company expects suppliers and business partners to conduct their operations in an environmentally responsible manner and to comply with all applicable environmental laws and regulations in order to protect public health and safety.

**Pollution Prevention and Resource Efficiency**

Suppliers and business partners are expected to minimize the use of natural resources, including water, electricity, and all forms of energy. This includes implementing appropriate measures for the management and reduction of waste generated from production processes.

**Hazardous Substances**

Suppliers and business partners shall identify, monitor, and manage chemicals and other hazardous materials that may pose risks if released into the environment without adequate treatment. Appropriate procedures shall be in place to ensure the safe handling, movement, storage, use, recycling, reuse, and disposal of such materials.

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**Wastewater and Solid Waste**

Wastewater and solid waste generated from operations, industrial processes, and waste treatment facilities shall be appropriately characterized, monitored, controlled, and treated as required prior to discharge or disposal.

**Air Emissions**

Air emissions, including volatile organic compounds (VOCs), particulate matter, corrosive substances, ozone-depleting substances, and combustion by-products generated from operations, industrial processes, and waste management activities, shall be appropriately identified, monitored, controlled, and treated in accordance with applicable requirements prior to release.

**Environmental Permits and Compliance**

Suppliers and business partners shall obtain, maintain, and keep current all required environmental permits, approvals, and registrations. They shall also comply with all operational and reporting requirements stipulated in such permits and applicable regulations.

**Section 4:  
Business Ethics**


The Company expects its suppliers and business partners to conduct their business in accordance with the highest ethical standards. Employees of suppliers and business partners shall exercise sound ethical judgement and consider the impacts of their actions when making decisions.

**Integrity in Business Conduct**

Suppliers and business partners shall not engage in or tolerate any form of bribery, corruption, fraud, embezzlement, or extortion, whether directly or indirectly. They shall establish and implement appropriate policies and controls to monitor and enforce compliance with ethical business conduct.

Suppliers and business partners shall not offer, provide, or accept gifts, payments, commissions, services, rebates, special privileges, or any other benefits to or from the Company's employees or their family members with the intention of obtaining improper advantages.

Hospitality or entertainment may be provided only where there is a legitimate business purpose, is reasonable and appropriate, and complies with applicable laws and regulations. Nominal gifts of modest value may be exchanged, provided they do not create, or appear to create conflicts of interest or undue influence.

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Suppliers and business partners shall not offer or provide any gifts, payments, or benefits—including bribes, hospitality, or facilitation payments—to government officials or authorities in connection with the Company's business activities.

Suppliers and business partners shall implement appropriate measures to prevent employees from engaging in bribery or corruption, including training and awareness programmes in accordance with applicable anti-corruption policies, and shall strictly prohibit the offering or acceptance of bribes for any direct or indirect business advantage.

The Company's employees must not solicit or accept any gifts, payments, or other benefits from suppliers and business partners. Suppliers and business partners are expected to report any actions that may violate this policy through the Company's designated reporting channels (please refer to Section 5: Grievance Mechanism).

#### **Conflict of Interest**

Suppliers and business partners shall avoid any financial or other relationships with the Company's employees that could create, or appear to create, a conflict of interest with the Company. Employees of the Company shall not serve as directors, officers, employees, representatives, or consultants of suppliers and business partners without prior approval from the Company's authorized management. Suppliers and business partners shall promptly disclose to the Company any actual or potential conflicts of interest and take appropriate measures to mitigate or resolve such conflicts.


#### **Disclosure of Information**

Suppliers and business partners shall accurately disclose information regarding their business activities, financial condition, and performance in accordance with applicable laws, regulations, and generally accepted industry practices.

#### **Privacy and Intellectual Property**

Suppliers and business partners shall respect and protect the Company's confidential information and intellectual property rights. They shall not misuse, disclose, or exploit such information or assets without proper authorization.

Suppliers and business partners shall implement appropriate safeguards to prevent unauthorized access, use, or disclosure of confidential information and shall ensure that intellectual property belonging to employees, customers, and other suppliers and business partners is adequately protected in accordance with applicable laws.

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**Fair Business Practices and Competition**

Suppliers and business partners shall conduct their business in a fair and ethical manner, including in marketing, advertising, and competition practices. Suppliers and business partners shall comply with all applicable competition and antitrust laws. They must not engage in anti-competitive practices such as price-fixing, bid-rigging, market allocation, or the improper exchange or use of confidential information.

**Management Systems**

Suppliers and business partners shall implement appropriate management systems to ensure compliance with applicable laws and regulations, and to support continuous improvement in meeting the expectations set out in this Code of Conduct.

**Legal and Regulatory Compliance**

Suppliers and business partners shall comply with all applicable laws and regulations relating to quality, health, safety, and environmental standards. They shall obtain, maintain, and keep up to date all required permits, licenses, and registrations, and shall fulfil all operational and reporting obligations as required under applicable laws and regulations.

**Risk Assessment and Management**

Suppliers and business partners shall establish and implement processes to identify and assess risks related to environmental, health and safety, labor practices, and ethical conduct associated with their operations.


Suppliers and business partners shall prioritize identified risks and implement appropriate physical controls and management procedures to effectively mitigate such risks and ensure compliance with applicable laws and regulations.

**Commitment and Accountability**

Suppliers and business partners shall comply with the expectations set out in this Code of Conduct by allocating appropriate resources and ensuring that these principles are effectively communicated and cascaded throughout their supply chain.

**Continuous Improvement**

The Company expects suppliers and business partners to continuously improve their operations in order to achieve sustainability objectives. Appropriate measures shall be implemented to ensure compliance with the labor, health and safety, and environmental standards set out in this Code of Conduct.

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**Internal Monitoring and Assessment**

Suppliers and business partners shall conduct periodic self-assessments to ensure compliance with applicable laws, regulations, contractual obligations, and the requirements set out in this Code of Conduct, including those related to social and environmental responsibilities.

**Corrective Action Process**

Suppliers and business partners shall establish processes to address any deficiencies identified through assessments, audits, or investigations in a timely and appropriate manner.

**Documentation and Record Keeping**

Suppliers and business partners shall maintain appropriate documentation and records to demonstrate compliance with applicable laws and this Code of Conduct. Records shall be properly retained and protected to ensure confidentiality while remaining accessible to the Company upon request.

**Supplier Responsibility**


Suppliers and business partners shall establish processes to communicate the requirements of this Code of Conduct to their own suppliers and monitor their compliance with all applicable laws, regulations, and the principles set out herein.

**Section 5:  
Grievance Mechanism**

The Company expects business partners to promptly notify the Company if they identify any instances of non-compliance with laws, regulations, or unethical business conduct that may be related to or have an impact on the Company. Such reporting shall be made in accordance with applicable laws and regulations in the relevant jurisdictions. Business partners have a duty to report concerns regardless of whether the issue involves their own operations or other parties. In addition to reporting concerns, business partners are also expected to cooperate with the Company in the investigation of such matters.

Suppliers and business partners may submit concerns using the contact details provided below. Reports may also be made anonymously:

1. Via email: [whistleblower@neo-corporate.com](mailto:whistleblower@neo-corporate.com)
2. By post, addressed to:

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Chairman of the Audit Committee / Audit Committee / Internal Audit Department

Neo Corporate Public Company Limited

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#### References

1. International Labor Organization (ILO) Convention No. 187 – Promotional Framework for Occupational Safety and Health (2006), latest revision as of 31 March 2015.
2. OECD Anti-Bribery Convention and the United Nations Convention against Corruption (UNCAC) (2003), together with applicable laws of Thailand.
3. United Nations Global Compact (UNGC) and the Sustainable Development Goals (SDGs).
4. Universal Declaration of Human Rights (UDHR) of the United Nations.
5. Anti-Corruption Policy (ACP) of Neo Corporate Public Company Limited.