

(Translation)

## Supplier Code of Conduct

WHA Group operates in the four areas of Logistics, Industrial Estates, Utilities and Power, and Digital Platform. Across these different areas, WHA Group operates a single policy of sustainable business development that applies to all stakeholders, both those within WHA Group and those outside. This emphasizes good governance and responsibility towards society and the environment, thus helping to maintain the balance between the demands of the latter two and WHA Group's business imperatives.

WHA Group is committed to success in all the areas in which it operates, and this includes ensuring that principles of good governance and social and environmental responsibility are maintained throughout our supply chain. In pursuit of this, WHA Group has established its 'Supplier Code of Conduct', which provides a set of principles and guidelines to help our business partner act in accordance with WHA Group's ethics and to reach the broader goal of achieving sustainable business development.

Guidelines:

Business Ethics

- **Honesty and integrity:** Business transactions should be conducted in a manner that is entirely transparent, and WHA Group is completely opposed to any and all forms of dishonesty or corruption.

Principles and practices relevant to the prevention of corruption

1. Sellers and contractors are absolutely prohibited from acting dishonestly or corruptly, whether that is by giving or promising to give, receiving, asking for or demanding any form of bribery, whether that be in the form of assets, money, goods or any other benefits, the provision of which goes against accepted principles of morality and ethics, the law, relevant rules and regulations, or any other pertinent policies when those benefits accrue to any individual or individuals, including government officials, any person who conducts business with the buyer, staff employed by the buyer or any employee of the WHA Group. This applies in Thailand and in all other countries and covers any action that provides inappropriate benefits or gain to organizations, an individual involved in the transaction or any third parties.
2. Sellers and contractors are required to act in accordance with the buyer's anti-corruption principles as specified on the company website at <https://www.wha-logistics.com/th/sustainability/corporate-governance> and <https://www.wha-up.com/th/cg> (as appropriate) and they must not engage in any type of corrupt practice, directly or indirectly. Sellers and contractors should not engage in any activity that increases the risk of corrupt or dishonest practices occurring, and they should exercise extreme care when giving or receiving gifts or presents, or when entertaining or being entertained. Activities such as these should be carried out only in accordance with the buyer's anti-corruption policies.
3. Sellers and contractors should conduct their activities with transparency and honesty when carrying out business with government agencies, government officers or the private sector, and whether business is being conducted domestically or internationally, all individuals involved should act in accordance with all relevant laws.

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- **Conflicts of interest**

Individuals and organizations should not seek benefits for themselves or for third parties when conducting business with WHA Group, or act in such a way as to create a conflict of interest.

- **Infringements of copyright laws and intellectual property rights**

1. Sellers and contractors are required to confirm that goods sold to the buyer do not infringe any trademark or copyright laws, and to assure the buyer that the goods sold or services provided reach the quality and standards required.
2. Sellers and contractors will not release, transmit or communicate any information that is the intellectual property of WHA Group when this has come into their possession as a result of business activities carried out with WHA Group.

- **Maintenance of confidentiality**

1. Sellers and contractors are responsible for ensuring that confidential information that they receive is not released to any other party. This information may be contained in documents provided by the seller, revealed in purchase orders or documents connected to these, or in contracts for purchase or hire, and may include information on customers, business information and any other confidential information about or relating to the buyer. Confidential information such as this that is revealed to sellers and contractors may be used only for the purposes of employment or exchange as specified in the relevant purchase order, and sellers and contractors are absolutely prohibited from releasing confidential information to any third parties or from allowing any third parties (which includes but is not limited to individuals acting under the orders of the seller or contractor, their agents or representatives, or their staff or employees) to release confidential information relating to the buyer to any other party, except where this has been explicitly authorized in advance in writing.
2. The responsibilities of sellers and contractors given above do not apply to information concerning or documents supplied by the buyer in the following cases:
  - (i) Information or documents that are released to the public through no fault of the seller or contractor.
  - (ii) Information or documents that the seller or contractor already knew or had possession of when this was released or transmitted to the seller or contractor.
  - (iii) Information or documents that a third-party releases to the seller or contractor when that third party is not prohibited from doing so.
  - (iv) Information or documents that are released as required by the law, whether by a court order or under the instruction of another official body.

These provisions are effective for the duration of the trade, employment or contracting work as specified in the relevant purchase order and for another 2 years subsequent to the last day on which the purchase order was effective.

(Translation)

- **Business activities**

1. To improve transparency and reduce the possibility of conflict, all business activities should be carried out in the strictest accordance with the relevant regulations on purchasing, employment, accounting and finance.
2. Business should be conducted according to the relevant international, national and local laws.

- **Supply-chain management**

1. The policies and code of conduct as well as other relevant information of WHA Group will be communicated to our business partners.
2. The procedures and processes for identifying key business partners will be specified and measures will be established to identify and to manage risk arising from activities involving these partners, especially when these partners are themselves considered a risk, whether that be economic, social or environmental.
3. Measures will be specified to ensure that the activities of business partners are in accordance with WHA Group's code of Conduct and that they meet prevailing social and environmental standards.

- **Growing sustainably together**

WHA Group has opened communication channels to allow the sharing of information with trade partners and stakeholders in our business activities, and we believe that this will help all parties develop and grow in a sustainable fashion.

### **Social Responsibility dimension**

- **Human rights**

WHA Group respects the rights of all staff and employees and confirms in the strongest way possible that it will not use force or act inhumanely, will not subject staff and employees to any form of physical, verbal or mental abuse, and will not threaten or compel staff and employees in any way.

#### The fundamental right to equal treatment

WHA Group will at all times act towards staff and employees on the basis of fairness and equality, and will not discriminate against an individual due to their place of birth, nationality, sex, age, ethnicity, religion, abilities, a prior lack of opportunities, social position or any other factor.

- **Labour rights**

1. Labour relations will be conducted in full accordance with the relevant laws.
2. No illegal labour will be employed by WHA Group and the hiring of foreign labour will be carried out in line with the procedures specified by the Ministry of Labour.

(Translation)

3. WHA Group will under no circumstances engage in activities involving trafficked or forced labour, or where individuals have been forced to act due to the threat or use of physical or mental punishment, intimidation or imprisonment.
4. All employees will be afforded full labour rights of assembly and collective bargaining and will be granted annual leave and other holiday as required by the law.
5. All employees will be paid or receive compensation appropriate for the type and length of work carried out, and they shall also receive all other benefits as required by the law.

- **Children's rights and the use of child labour**

1. No child under the age of 15 will be employed by WHA Group, and doing so would be a contravention of the relevant Ministry of Labour rules.
2. No child under the age of 18 will be employed by WHA Group to work at WHA Group locations that are considered dangerous for children or on any building or construction site.

- **Occupational health and safety**

Safety and the working environment

Business partners are required to ensure that working environments are managed in accordance with the Occupational Health Act and all other relevant national laws and regulations.

Personal protective equipment

Business partners are required to supply personal protective equipment (PPE) to their staff and employees where the risk is such that this is required, and to monitor and control the use of PPE in accordance with WHA Group's policies and the relevant laws.

## **Environmental responsibility**

- **Acting in accordance with the relevant environmental laws and regulations**

Business partners are required to carry out their business operations in a manner that demonstrates respect for and responsibility towards the environment and that is in line with all relevant laws, regulations and standards.

- **Acting in an environmentally-friendly manner and using resources efficiently**

1. Business partners should conduct their business in an environmentally-friendly manner, and their decisions should be informed by a consideration of the environmental impacts of their actions. Partners should also reduce the wasteful consumption of resources.
2. Business partners should preserve and protect the environment by using natural resources efficiently and by working with WHA Group to promote environmentally-sustainable development.

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3. Business partners should refrain from engaging in business activities in locations that are centres of biodiversity. They should also establish business standards that reduce impacts on biodiversity and that provide for the preservation and restoration of biodiversity in areas where business is carried out.
4. Goods, materials, and equipment, and in particular construction supplies, should be checked for their provenance, and business partners should confirm that no items are sourced from areas of outstanding natural biodiversity.

- **Procedures and processes for checking compliance**

To ensure that all operations (though with a particular interest in projects carried out in community areas) are in accordance both with the law and with suppliers' and contractors' safety guidelines, WHA Group will conduct random inspections of procedures for the monitoring and reporting of activities and the effectiveness of safety operations at least once per year, though when asked to do so by local communities, these checks may be more frequent.

To support our project of joint sustainable development, WHA Group requests that business partners acknowledge and strictly adhere to this supplier code of conduct.

This policy was consider and approved by the Board of Directors' Meeting No. 5/2020 which was held on 15 May 2020.

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(Ms. Jareeporn Jarukornsakul)

Chairman of the Board of Directors and Group Chief Executive Officer