

Gunkul Engineering Public Co., Ltd. and GUNKUL Group			
	Supplier Code of Conduct	Doc. No.	POL-BOD_68-024
		Effective date	13 NOV 2025
	Approved by the Resolution of the Board of Directors Meeting No. 7/2025 dated 13 November 2025	Issue No.	2.0
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Objectives

Gunkul Engineering Public Company Limited (the “Company”) and Gunkul Group (the “Group”) are committed to conducting business in a manner that promotes sustainable and stable growth. The Company recognizes the importance of sustainable supply chain management and strives to create long-term value for all stakeholders. This is achieved under the good corporate governance principles, adherence to ethical conduct, and transparency, while maintaining responsibility toward communities, society, and environment. The Company places great importance on respecting individual rights and freedoms, ensuring fair and equitable labor practices and human rights, promoting occupational health and safety, and maintaining a safe and healthy working environment. Simultaneously, the Company focuses on the efficient and optimal use of natural resources to preserve ecological balance and biodiversity. Additionally, it implements climate change response strategies to support its vision, mission, policies, and objectives, all of which aim to position the Company as a leader in integrated renewable energy and electrical systems, while continuously developing toward a secure and sustainable future.

Therefore, the Company has established this “**Supplier Code of Conduct**” as a key set of shared guidelines. It is intended to serve as a framework for supplier including suppliers, contractors, subcontractors, service providers, lessors, or lease providers who deliver goods or services to follow or adapt in the management and operation of their businesses in an ethical, socially responsible, and safety-compliant manner. This also includes sustainable environmental management practices, in accordance with the following principles:

1. Code of Conduct

1.1 Good Corporate Governance

Suppliers must conduct business based on principles of integrity, honesty, transparency, and accountability. They shall adhere to ethical standards and provide equal and fair opportunities in commercial competition. Suppliers must not engage in any actions that are anti-competitive. They are required to deliver goods and services of quality that comply with agreed terms and within the specified timeframe. Additionally, suppliers must comply with all applicable laws, regulations, and requirements both domestic and international, throughout the entire supply chain operations.

1.2 Anti-Corruption

Suppliers shall not engage, directly or indirectly, in any acts that may facilitate or support corruption in any form. This includes offering or accepting bribes, gifts, or any incentives intended to benefit family members, close associates, or stakeholders between the supplier and the Company’s personnel for any improper advantage.

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1.3 Conflict of Interest

Suppliers must uphold ethical standards in conducting their business and must not allow personal interests to influence any part of the business process. They shall strictly avoid any situations that may lead to conflicts of interest or overlapping interests with the Company's personnel.

1.4 Confidentiality of Personal Data and Protection of Intellectual Property

Partners must respect, safeguard, and protect personal data deemed confidential, including the personal information of the Company's personnel and confidential intellectual property belonging to the Company. Such information must not be disclosed, distributed, reproduced, cited, or used, whether directly or indirectly for any personal gain or advantage. This includes any business-critical or confidential information related to companies within the Group.

In addition, suppliers must comply with applicable laws and regulations concerning data protection, including the Personal Data Protection Act (PDPA) in Thailand, or other relevant local data privacy laws in jurisdictions where they operate. Additionally, appropriate measures must be in place to prevent data breaches.

Furthermore, suppliers must also respect and avoid infringing upon patents and intellectual property rights of others and of the Company. In the event that the use or reference of such information is necessary, prior written consent from the Company must always be obtained.

1.5 Political Neutrality

The Company encourages suppliers to adhere to the principle of political neutrality. Suppliers are requested to refrain from actions that may be interpreted as supporting or opposing any political party or political group while performing duties under their responsibilities for the Company. The Company respects suppliers' rights and freedoms to express political views in accordance with the law. However, such expressions must occur outside the scope of work related to the Company and must not cause misunderstanding or negatively impact the Company's image.

1.6 Complaints

Suppliers are encouraged to establish clear, transparent, and verifiable channels for receiving complaints, grievances, and reports of misconduct. A process should be in place to protect the confidentiality and privacy of complainants or whistleblowers, as well as to provide appropriate remedies for affected parties.

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2. Human Rights and Labor Practices

2.1 Respect for Human Rights

Suppliers must respect the principles of human rights, uphold the dignity of employees, and treat everyone with respect and equality. There must be no discrimination or exclusion based on physical or mental condition, age, gender, sexual orientation, race, nationality, skin color, language, religion, education, traditions and cultural practices, social status, disability, property, residence, political opinion, or any other form of unequal treatment that should be protected under labor laws and human rights principles of each respective country.

2.2 Prohibition of Forced Labor

Suppliers must operate their business without engaging in or supporting any form of forced labor, including debt bondage, human trafficking, or any physical or psychological coercion. This includes punishment or mistreatment such as threats, confinement, intimidation, harassment, abuse, or violence in any form, covering all activities throughout the supplier's supply chain.

2.3 Prohibition of Child Labor

Suppliers, including all activities within their supply chains, must not employ or support the employment of child labor below the minimum legal working age established by the laws of each country in which they operate.

2.4 Freedom of Association and Collective Bargaining

Suppliers must respect and protect employees' rights to participate in collective bargaining, form or join associations or labor unions, or become members of any collective labor relations groups. These activities must be conducted peacefully, without disrupting the efficiency and continuity of operations, in accordance with applicable laws and consistent with ethical principles.

2.5 Fair Labor Practices

Suppliers must comply with labor laws in alignment with internationally recognized human rights principles, such as the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization (ILO), the Universal Declaration of Human Rights (UDHR), and the United Nations Guiding Principles on Business and Human Rights (UNGPs). This includes adherence to local human rights and labor laws regarding wages, compensation, holidays, leave entitlements, and other employee benefits, which must be fair, adequate, and sufficient for a decent standard of living. Suppliers must also manage working hours, overtime, and holiday work in accordance with legal limits, ensuring that employees are not required to work excessive hours. In addition, suppliers are encouraged to provide opportunities for training and skills development to enhance employee capabilities, support organizational growth, and ensure equal opportunities for career advancement.

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3. Safety and Occupational Health

3.1 Occupational Health and Safety Management

Suppliers must provide a safe working environment in compliance with relevant occupational health, safety, and environmental laws, regulations, standards, and guidelines. This applies to all employees and related personnel to reduce the risk of injury or accidents during operations. Additionally, suppliers must provide adequate and appropriate personal protective equipment (PPE) that meets applicable standards to all employees based on their work conditions.

3.2 Emergency Preparedness

Suppliers must establish emergency preparedness measures, including conducting training, drills, and clear communication to ensure that employees are well-informed about procedures and protocols in the event of an emergency. These measures and procedures must be reviewed regularly to maintain ongoing readiness.

4. Environmental

4.1 Environmental Management

Suppliers must comply with all applicable environmental laws, regulations, and standards related to product manufacturing, service provision, and transportation in each country where they operate. They should implement measures to minimize environmental impact, conserve natural resources, avoid deforestation, prevent ecosystem degradation, and protect biodiversity. They are encouraged to use resources efficiently, reduce energy and water consumption, minimize waste, and lower greenhouse gas emissions. They should also promote the use of environmentally friendly products and services, demonstrating a commitment to sustainable environmental management.

4.2 Waste Management and Pollution Control

Suppliers are responsible for managing and reducing waste generated from production processes and business operations in a proper and lawful manner to minimize environmental pollution. Waste management must comply with all relevant laws, rules, requirements, and regulations.

4.3 Chemical and Hazardous Substance Management

Suppliers must establish proper control measures for the use of chemicals and hazardous substances. They must ensure proper storage and disposal methods in accordance with applicable laws and regulations.

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4.4 Climate Change Response

Suppliers should prioritize climate change mitigation and actively respond to its challenges. They are encouraged to develop internal operational processes that reduce greenhouse gas emissions arising from their business activities and throughout their associated supply chains.

5. Corporate Social Responsibility

5.1 Community and Social Engagement

Suppliers are required to conduct their business with social responsibility and actively participate in or support initiatives aimed at improving quality of life and well-being within the communities they operate. Such efforts should respect the local culture, traditions, and way of life, and be undertaken voluntarily in accordance with opportunities and appropriateness. Suppliers should also support the procurement of goods and services from local vendors to promote job creation and income generation within the community.

5.2 Management of Community Safety Impacts

Suppliers must operate their business with consideration for the safety impacts on the community. They are required to demonstrate appropriate and adequate safety measures and emergency preparedness plans to prevent any adverse effects on the community arising from their operations.

6. Sustainable Supply Chain

Suppliers are required to support and promote their own suppliers within the supply chain to adopt and implement the principles set forth in this Supplier Code of Conduct. This demonstrates their commitment and direction toward sustainable management of the entire supply chain.

Termination of Supplier Status

Suppliers who violate the provisions of this Supplier Code of Conduct will be subject to termination of their partner status in the Company's Approved Vendor List within the procurement system.

Complaint, Whistleblowing, and Feedback Channels

In the event that a supplier witnesses any actions that may constitute a violation or non-compliance with this Supplier Code of Conduct, the supplier may file a complaint, provide feedback, or raise other important matters directly to the Audit Committee. Complainants are required to provide details of the issue along with their name, address, and a reachable telephone number. The report can be submitted through one of the following official channels:

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- 1) Submit via the Audit Committee's e-mail: audit_committee@gunkul.com
- 2) Submit via the Company's website: www.gunkul.com, at "Whistleblowing channel"
- 3) Submit via sealed postage to:

Chairman of the Audit Committee
Gunkul Engineering Public Company Limited
548 One City Centre (OCC), 44th Floor, Phloen Chit Road
Lumphini, Pathum Wan, Bangkok 10330

Contact Information

In case of any questions, suggestions, or requests for additional information, please contact the Company through the following channels:

- Purchasing Department
Gunkul Engineering Public Company Limited
548 One City Centre (OCC), 44th Floor, Phloen Chit Road, Lumphini, Pathum Wan, Bangkok 10330
Tel: 02-242-5800
E-mail: g_purchase@gunkul.com

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Acknowledgement and Commitment to Comply with the Supplier Code of Conduct

I have read, understood, and acknowledged this Supplier Code of Conduct, and I hereby agree to fully comply with its provisions in all respects. This includes maintaining and providing relevant records as evidence of compliance with this agreement upon request by the relevant companies within the Group. I also consent to allow the relevant companies within the Group to conduct site visits or performance assessments of suppliers' operations to ensure alignment with the intent and principles of this Supplier Code of Conduct.

Supplier's Acknowledgement and Company Stamp (if applicable)

Supplier Company Name:

Address:

Signature: _____

Name/ Surname: _____

(Authorized Signatory as per the Company's Affidavit)

Position: _____

Date: _____

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Revision Record

Document No.	Issue No. /Revision No.	Date	Revised Part	Reason of Revision	Date of Cancellation
POL-BOD 68-020	1.0	14 MAY 2025	Reviewed	To comply with the principles of the supervising agency and the current operations	13 NOV 2025
POL-BOD 68-024	2.0	13 NOV 2025	Reviewed	To comply with the principles of the supervising agency and the current operations	-