
	<p>ประเภทเอกสาร : นโยบาย (Policy)</p> <p>Subject: Business Partner code of conduct</p> <p>Applied DB Public Company Limited and Subsidiary</p>	<p>Doc. No.</p> <p>IA₁-ADB-12</p>	<p>Effective date</p> <p>09/08/2023</p>	<p>Rev. No.</p> <p>02</p>	<p>Page</p> <p>1</p>
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-Translation-

Business Partner code of conduct

Applied DB Public Company Limited and Subsidiary

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Business Partner code of conduct

Applied DB Public Company Limited and its subsidiaries (hereinafter collectively referred to as the “Company”) are committed to and continuously strive to develop, strengthen, and promote high standards of integrity and business ethics in all dealings with our business partners.

To ensure that our relationships with business partners meet expectations, the Company has established this Code of Conduct for Business Partners (hereinafter referred to as the “Code”). This Code sets forth the initial guidelines for our business partners to adhere to when conducting business with us.


The objectives of this Code of Conduct for Business Partners are as follows: To provide business partners with preliminary information regarding the Company’s key principles and expectations. The Company will introduce key information of this Code and provide the full document to business partners during the vendor registration process, contract signing, or annual business review. The key contents include procurement rules, work processes, expectations, and work standards for conducting business with the Company. To ensure that business partners have an appropriate understanding of our aligned business objectives.

The implementation of this Code serves to mitigate business risks and foster positive relationships with our business partners. By clearly communicating the Company’s intentions, we expect all business partners to have policies and practices that align with ours, promoting mutual support and development towards a sustainable business partnership.

The Company sincerely hopes that responsible personnel or representatives of our business partners will carefully study, understand, and effectively implement this Code within their organizations. This will contribute to strengthening our shared value chain, creating mutual benefits across the three dimensions of sustainability: Environment, Social, and Governance, for the long term.



Mr. Wang Wanapaisan
Chief Executive Officer, Applied DB Public Company Limited
President, ADB Sealant Company Limited

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How to Use the Partner Code of Conduct)

1. Business partners will receive the “Partner Code of Conduct” document on the account opening date, prior to commencing any transactions. Business partners are required to acknowledge and be able to comply with Sections 1 and 2. If a business partner is unable to comply with any clause within these sections, the Company will request the business partner to rectify the deficiency within a specified timeframe according to a corrective action plan. The Company will help and collaborate with the business partner continuously to enable them to meet the requirements of this Code of Conduct.

2. The principles outlined in Section 3 clearly express the Company's intention to elevate our partnerships towards excellence, promote good corporate governance, combat corruption, and reflect our expectation that business partners will conduct their operations in accordance with international work standards and engage in transparent and honest dealings with the Company.


The Company's policy is to treat all business partners equitably and without discrimination.

The Company places significant importance on the procurement of raw materials and factors of production, which are critical operations supporting the Company's business activities. This is conducted under good corporate governance and rigorous oversight. The Company values its business partners and treats them equitably and without discrimination.

Based on principles of fair, transparent, and equitable competition, and with the aim of progressing towards a long-term, mutually supportive business partnership, the Company is committed to sustainable practices with its business partners. This is coupled with supply chain management to ensure that the Company's business partners operate ethically, demonstrate social responsibility, respect human rights, prioritize occupational health and safety for their customers and consumers, and effectively manage relevant environmental aspects.

The Company's guidelines in this regard are as follows:

- 1) Company personnel involved in procurement and contracting must prioritize the intended use, requirements, value for money, price, and quality of the procured goods and services to ensure maximum benefit for the Company.
- 2) Company personnel shall treat business partners fairly, honestly, and without exploitation, always considering the Company's best interests while ensuring equitable returns for both parties. Situations that could lead to conflicts of interest should be avoided. Problem-solving negotiations should be based on the business relationship.
- 3) The Company must adhere to contractual terms and manage contracts correctly. If it is found that the Company cannot fulfill its contractual obligations, or if a business partner cannot fulfill their obligations, or if any event occurs that may negatively impact the Company's interests or cause damage, the relevant personnel must promptly report this to their superiors or authorized

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personnel for consultation and to find a resolution. The Company will work together with the business partner to consider solutions based on the principles of reasonableness.

- 4) Maintain sustainable relationships with business partners and foster collaboration in economic, social, and environmental aspects.
- 5) Employ equitable criteria for the assessment and selection of business partners based on fair competition.
- 6) Procurement and sourcing processes must be auditable to ensure transparency and maximize benefits.
- 7) Provide truthful and accurate information.
- 8) Support and collaborate with business partners in producing high-quality and standardized products.
- 9) Uphold equality, fairness, avoid exploitation, and maintain honesty in business dealings. Protect mutual interests with business partners by strictly adhering to applicable laws and agreed-upon regulations.
- 10) The Board of Directors, executives, and employees are prohibited from receiving or soliciting benefits, or offering or providing any improper benefits in commercial dealings with business partners.
- 11) Maintain confidentiality and refrain from using information for personal gain or the undue benefit of related parties.
- 12) Communicate the Company's anti-corruption policy to business partners to ensure mutual understanding and to build a broader coalition for the prevention and combating of corruption.


Compliance with Laws

In addition to adhering to this Code of Conduct, business partners are obligated to comply with all applicable laws, rules, and regulations of Thailand. This includes laws pertaining to regulatory oversight, competition, product safety, and liability for the impacts arising from products, occupational diseases of labor, the working environment and surrounding environment, the protection of intellectual property, the protection of privacy, and equality in employment practices. In the absence of relevant domestic laws, business partners must comply with applicable international treaties, conventions, standards, and criteria.

Section 1: Product and Delivery Measures

1. Acceptance of Agreement

Following communication with the business partner to reach a purchase agreement, the Company will issue a purchase order for raw materials, packaging, products, goods, and services to the business partner. The details specified in the purchase order will be governed by the terms and conditions of purchase. The purchase order will exclusively represent the purchase agreement, quotation, delivery terms, and other offers stated

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therein. Upon receipt of the purchase order, it shall be deemed as acceptance of the order according to the agreed terms.

2. Delivery

Goods must be delivered in the quantity and at the time specified in the purchase order or according to the Company's requirements. The delivery schedule is an integral part of the purchase order and is subject to its terms and conditions. In the following cases:

- 2.1. If the business partner delivers quantities exceeding those specified in the purchase order, the Company reserves the right to refuse acceptance of the delivered raw materials, packaging, products, goods, etc., without being held liable.
- 2.2. If the business partner delivers quantities less than those specified in the purchase order, the business partner must notify the Company within 4 days. If it does not impact any work processes, the Company will prepare a purchase order completion document for approval to finalize that item and proceed with payment approval.
- 2.3. If the business partner is unable to deliver by the date specified in the purchase order, the business partner must notify the Company within 4 days prior to the scheduled delivery date.
- 2.4. The business partner must ensure that all aspects of product delivery, including loading, transportation, and unloading/handling, are carried out in compliance with relevant laws and safety principles.


3. Changes

In the event of any changes or improvements within the business partner's internal processes, including modifications to the standards or types of raw materials, packaging, products, machinery, etc., that may affect the quality of ordered raw materials or products, the business partner must submit a detailed explanation document to the Company, along with samples for inspection, at least 15 days in advance. Delivery of the raw materials, packaging, products, or services can only proceed without being considered a breach of agreement upon written approval from the Company.

4. Company's Assets and Confidentiality

- 4.1. Patterns, molds, tools, packaging, equipment, and proprietary data and documents are collectively referred to as "Assets." The Company retains ownership of Assets provided, whether directly or indirectly, or paid for by the Company to the business partner for performance under purchase orders and agreements. The business partner must not use these Assets for any work other than that performed for the Company.

During the time Assets are in the business partner's possession, the business partner shall hold them as a bailee and must take care and manage plans for their maintenance, repair, and storage to keep them in good working condition. The business partner will provide and report the condition of the Assets to the Company upon request. If the return of Assets is requested, the bailee shall return them to the Company in the condition they were received, except for reasonable wear and tear from normal use in

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the performance of work. In the event of damage or malfunction, the Company must be notified immediately, and approval must be obtained before any repair or corrective action is taken. Under no circumstances shall the Company's business partners use the Company's trade information, copyrights, and trademarks except as authorized under agreements made with the Company, and may not misappropriate or infringe upon the trade information, copyrighted works, or trademarks of others. Furthermore, the Company's business partners must not misuse the trade secrets, proprietary information, or confidential information of others for their own benefit or disclose such information to external parties without authorization.


- 4.2. The business partner must have adequate measures in place to ensure the protection and confidentiality of information from transactions with the Company, including the Company's confidential and proprietary information, the Company's intellectual property, and other non-public information (which includes but is not limited to information about customers, contracts, pricing, employee compensation, knowledge, expertise, processes, and practices). In the event of unauthorized disclosure of such information, whether intentional or unintentional, the Company must be notified immediately.
- 4.3. The business partner must not seek personal gain or commercial advantage from the Company's confidential or proprietary information obtained through transactions with the Company or the Company's employees.

5. Quality Control

- 5.1. The business partner shall maintain the standards of inspection and quality control testing, or certification of origin, as promised or offered when selling products or services to the Company.
- 5.2. The business partner shall present and deliver documentary evidence of product quality certification and the results of inspections and tests related to quality control that substantiate the product's specifications.
- 5.3. The business partner must notify the Company in writing, prior to implementing any changes to the manufacturing processes or the Company's specifications as stated and ordered in the purchase order, and must receive approval from the Company before such changes are implemented. In any event, if any changes adversely affect the production process and cause damage, the Company reserves the right to claim actual damages incurred as a result of such changes.

Section 2: Safety, Health, and Environment Principles

1. The Company has a policy regarding safety and the working environment that is appropriate, legally compliant, and ensures that employees have safety, occupational health, and a good working environment. Employees, especially those working with machinery or in hazardous areas, receive safety and occupational health training and are provided with appropriate personal protective equipment.


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2. Service contractors entering the Company's premises to perform work must conduct a work risk assessment and participate in basic safety training with the Company. They must also have complete and appropriate personal protective equipment before commencing work.
3. All employees are committed to adhering to environmental standards, using energy and resources efficiently, and procuring or using raw materials, packaging, products, goods, and materials that are recyclable and minimize environmental impact. While representatives of business partners are working on the Company's premises, they should adhere to safety standards, comply with the Company's regulations, and avoid causing damage to the environment during their work or ensure proper cleanup before completing their tasks.

Section 3: Partnership for Excellence

1. Employment and Human Rights

- 1.1. Business partners should have policies and processes in place to ensure that fundamental human rights, as proclaimed in the Universal Declaration of Human Rights, and labor rights, as declared in the International Labour Organization's core conventions, are protected in their operations and activities, both within their own organization and throughout their supply chain.
- 1.2. Business partners must have adequate measures to promote diversity and non-discrimination. They must also ensure that employees are treated fairly and equitably, including in matters of compensation and promotion of personnel development, without discrimination based on nationality, religion, language, age, gender, marital status, personal attitudes regarding sexual orientation, disability, trade union membership, employee committee membership, political affiliation, or other personal beliefs.
- 1.3. Business partners must guarantee that their supply chain operations are free from child labor, forced labor, slavery, or human trafficking in any form, consistent with the Company's policy of zero tolerance for such human rights violations.
- 1.4. Business partners should ensure that the working environment for all employees is fair and appropriate. This includes ensuring that working hours, wages, benefits, holidays, living conditions, and workplace conditions comply with relevant labor laws and regulations.
- 1.5. Business partners should provide a working environment that adheres to occupational health and safety principles, in accordance with local and international occupational health and safety standards. This includes establishing an adequate safety management system that promotes safety awareness, supports improvements in safety processes, and oversees occupational health and safety.
- 1.6. Business partners must demonstrate that they have appropriate and sufficient measures in place to avoid or prevent negative impacts on local communities resulting from their activities or operations. In the event of any incidents, they should have adequate measures for impact mitigation and reconciliation. Furthermore, business partners should establish grievance mechanisms to provide channels for reporting and investigating potential incidents.

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2. Environmental Responsibility

- 2.1. Business partners should demonstrate environmental responsibility in accordance with relevant local and international standards and should have appropriate processes in place to manage key environmental issues.
- 2.2. Business partners must adhere to relevant environmental laws and regulations at the local and international levels, including any related terms and conditions in contracts or agreements made with the Company (if any), as guidelines. Business partners must comply with necessary requirements, which include environmental impact assessments and obtaining permits as specified in such laws, regulations, contracts, and/or agreements.
- 2.3. Where possible, business partners must demonstrate that they have appropriate and sufficient mechanisms in place to prevent negative impacts on the environment. If avoidance is not possible, they should have mechanisms for mitigating impacts and restoring conditions in the event of any incidents. Furthermore, business partners should establish grievance mechanisms to provide channels for reporting and investigating potential incidents.
- 2.4. Business partners should have clear environmental measures in place that apply to their operations, procurement processes, goods, and services.

3. Anti-Corruption and Anti-Bribery


The Company is committed to conducting business ethically and prohibits its employees from engaging in corruption and bribery, both directly and indirectly, including bribery, illegal activities, and unethical conduct. The Company's business partners must not offer, promise, or authorize the giving of bribes, gifts, fees, rewards, or any undue benefits that are not related to normal business operations or customary business practices to government officials, customers, business partners, or ADB employees to gain an unfair business advantage or to exert improper influence over any actions or decisions.

4. Conflict of Interest

The Company's business partners must avoid any situations or relationships that could involve an inappropriate conflict or potential conflict of interest with the Company. Business partners must not offer or provide gifts, services, or entertainment of excessive value to the Company's employees or their family members. Furthermore, the Company's employees must not have any conflicts of interest with any entities that are business partners, and business partners must avoid such relationships.

5. Insider Trading

The Company's business partners must not use non-public information obtained during the course of their business dealings with the Company for the personal benefit of the business partner, their employees, or any other individuals, where such benefit is not in the mutual business interest of both parties.

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Contact or Reporting Complaints

Should a business partner have any inquiries, suggestions, or complaints regarding this Partner Code of Conduct, or if they become aware of any potential fraudulent or unethical conduct by a Director, Executive, or employee of the Company, they can contact the Company's Internal Audit Department via email at adb_cg@adb.co.th. Whistleblowers will be protected under the Company's Whistleblowing Policy in all cases.

Acknowledgement of Agreement

คู่ The business partner acknowledges the terms and conditions and agrees to comply with this Partner Code of Conduct of Apply DB Public Company Limited and its subsidiaries, which encompasses the operating principles, intentions, and expectations. In the event of any significant changes, the business partner will be notified in writing.

Acknowledged by:

Edit history page

No.	Rev. No.	Description	For the controller	
			Effective Date	Request No.
01	00	Create new documents for use in operations	14 February 2020	-
02	01	Edit documents 1. Add a topic on anti-corruption and corruption	30 June 2021	-
03	02	Edit the important points as follows: 1. Increase the scope of enforcement for subsidiaries. 2. Add a topic on treating business partners equally and without discrimination 3. Edit Section 1 in the Quality Control section . 4. Edit section _2 in the Safety, Environment and Working Environment Practices section . 5. Edit section _3 in the section on adding the section on cooperation for excellence in the topic. 5.1 Employment and human rights 5.2 Environmental responsibility 6. Add a complaint topic and contact channels	9 August 2023	DAR-41/23