



บริษัทน้ำตาลเกษตรผล จำกัด  
KASET PHOL SUGAR LTD.

สำนักงานใหญ่ ตั้งอยู่เลขที่ 90/44-45 ชั้น 16 อาคารสารธานี 1 ถนนสารเหนือ  
แขวงสีลม เขตบางรัก กรุงเทพฯ 10500. ประเทศไทย  
HEAD OFFICE LOCATED AT 90/44-45, 16F., SATHORN THANI BUILDING 1.  
NORTH SATHORN RD. SILOM ,BANGRAK BANGKOK 10500 THAILAND.  
TEL 02-266-7677 (AUTO) FAX 02-236-4732

## Code of Conduct (For Business Partner)

As Kaset Phol Sugar Ltd., including Head office, Factory, and affiliated companies within the group (collectively referred to as the “Company”), is committed to conducting business in a sustainable manner under the principles of good corporate governance. The Company adheres to ESG principles—Environmental (E), Social (S), and Governance (G)—by emphasizing environmental stewardship, social responsibility, and ethical, transparent, and accountable business practices in accordance with international standards.

Accordingly, the Company has established this Code of Conduct to serve as a guideline for external individuals and entities, including suppliers, raw material providers, service providers, consultants, agents, business partners, and distributors (collectively referred to as “**Business Partners**”), to ensure appropriate business conduct. The key requirements are categorized into five main areas as follows:

1. Business Ethics
2. Labor and Human Rights
3. Occupational Health and Safety
4. Environmental Responsibility
5. Social Contribution

### 1. Business Ethics

#### 1.1 Corporate Governance

Comply with applicable laws and regulations, ethical principles, and established local customs and traditions. Conduct business with due consideration for counterparties, customers, recipients of goods and services, stakeholders, and business partners, under the principles of good corporate governance. Operate with responsibility, integrity, transparency, and accountability, ensuring that business activities are verifiable and conducted in fair competition.

#### 1.2 Fair and Honest Business Practices

Refrain from offering, promising, giving, soliciting, accepting, or agreeing to give or receive any money, assets, or other benefits, including gratuities, gifts, entertainment, or travel—whether directly or indirectly—to employees, staff, executives, or any persons associated with such individuals, as well as to affiliated or group companies, for the purpose of entering into transactions or conducting business together.

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### 1.3 Anti-Corruption

Establish anti-corruption measures, internal control systems, and internal audit processes, and cooperate with the Group to prevent and combat fraud and corruption. In addition, Business Partners are encouraged to declare their commitment and seek certification as members of the Thai Private Sector Collective Action Against Corruption.

### 1.4 Gifts and Hospitality Policy

Comply with the Gift and Favor Policy, as well as the rules governing the acceptance of gifts and gratuities by government officials and public agencies as prescribed by law, in alignment with the principles of good corporate governance. This includes cooperation, upon request by the Company, with policies concerning the giving of gifts and gratuities to government officials, executives, employees, and individuals acting on behalf of the Company during festive seasons and other special occasions, in order to ensure transparent business practices without the expectation of any improper benefits in return.

### 1.5 Confidentiality and Protection of Information

Maintain the confidentiality of sensitive business information and any specific information disclosed by either party that is clearly designated as the Company's confidential information. Such information must not be disclosed without prior consent, and the confidentiality of others' information must also be respected and not infringed.

### 1.6 Personal Data Protection

Comply with applicable laws relating to personal data protection, as well as the Company's policies, requirements, rules, and regulations as announced. This includes strictly adhering to the collection, use, and disclosure of personal data, and implementing appropriate measures for the protection of such data.

The collection, use, and disclosure of personal data shall be carried out only to the extent necessary and in accordance with applicable laws and the relevant policies, requirements, rules, or regulations of the contracting entity. In this regard, Business Partners shall obtain consent for the disclosure of personal data as required by law.

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### 1.7 Intellectual Property Rights

Respect and comply with intellectual property laws, including rights related to trademarks, copyrights in computer programs, applications and software, as well as inventions and other copyrighted works, patents, and the intellectual property rights of others. This includes implementing measures to prevent any infringement of intellectual property and safeguarding the reputation and goodwill of trademarks, trade names, and other intellectual property of relevant parties.

## 2. Labor and Human Rights

Business Partners of the Group shall treat workers in compliance with applicable labor laws and in accordance with human rights principles.

### 2.1 Compliance with Labor Laws

Manage and establish employment arrangements, work regulations, and employment contracts that are fair and appropriate to the nature of each type of business. Supervise workers to ensure they do not engage in unlawful or unethical conduct, and that they are free from serious communicable diseases that are socially stigmatized or from drug abuse child labor shall be carefully considered, with employment limited to individuals who are at least 18 years of age. In the case of employing young workers, pregnant female workers, or persons with disabilities, strict compliance with applicable laws shall be ensured.

Refrain from demanding or seeking any improper benefits from workers and from exploiting them in any form. Forced labor, violence, corporal punishment, detention, intimidation, harassment, sexual abuse, and all forms of human trafficking are strictly prohibited. In addition, transparent and verifiable grievance mechanisms shall be established to receive and address complaints.

### 2.2 Wages, Benefits, and Working Hours

Manage wages, compensation, overtime pay, welfare, and employee benefits in a fair manner and in full compliance with applicable laws. In addition, ensure appropriate allocation of regular working hours, overtime hours, and working hours in cases of emergency or force majeure, as well as adequate rest periods and holidays in accordance with labor laws, in order to promote the well-being of workers.

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### 2.3 Equality and Non-Discrimination

Treat employees fairly in accordance with human rights principles, without discrimination on the basis of race, age, education, gender identity, and sexual diversity (LGBTQIA+), as well as religious and political beliefs. Respect employees' freedom of association, including the right to join or not to join associations, unions, or federations, and uphold their legal rights and human dignity with equality and fairness at all times.

## 3. Occupational Health and Safety

### 3.1 Workplace Safety

Strictly comply with applicable laws and standards on safety and occupational health. Provide a safe and hygienic workplace and working environment and ensure effective communication to enhance employees' awareness and understanding, with the aim of preventing and controlling potential injuries, illnesses, accidents, and emergencies. Furthermore, provide opportunities for employees to freely and openly raise and report safety-related concerns.

### 3.2 Personal Protective Equipment

Provide materials, equipment, tools, and vehicles of good quality that are properly maintained and ready for use, as well as adequate and appropriate personal protective equipment suitable for each type and nature of work.

### 3.3 Emergency Preparedness

Prepare reports that include emergency risk assessments, and establish plans and procedures for emergency preparedness, response, and post-incident recovery. Ensure continuous training and communication are provided to employees so that they clearly understand and are able to act correctly and safely in emergency situations. In addition, promptly report to the Company any emergency incidents that may impact the Company (such as spills, fires, complaints, or non-compliance with permits, etc.) occurring during operations or within areas under the responsibility of the Group.

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#### 4. Environmental Responsibility

##### 4.1 Compliance with Environmental Laws

Comply fully with the conditions stipulated in all applicable licenses related to business operations. Properly manage, control, and treat waste, residues, sewage, and industrial waste generated from business activities in accordance with applicable laws, academic principles, and internationally recognized environmental standards relevant to the nature of the business. This is to prevent pollution and minimize adverse impacts on the environment and public health.

##### 4.2 Resource Efficiency and Environmental Management

Business Partners of the Group are encouraged to promote the efficient use of resources by applying the 3Rs principles: Reduce, Reuse, and Recycle. This includes selecting environmentally friendly products and services and exercising due care in any operations that may have an impact on the environment.

##### 4.3 Environmental Impact Reduction

Business Partners of the Group are encouraged to promote energy efficiency across activities throughout the value chain, including raw material procurement, production, transportation, and service operations. This includes the preparation of greenhouse gas emissions inventories and supporting the implementation of measures aimed at reducing greenhouse gas emissions, thereby contributing to the mitigation of climate change impacts.

##### 4.4 Biodiversity and Forest Conservation

Business Partners are encouraged to participate in and recognize the importance of biodiversity and forest areas, and to support the assessment of biodiversity and forest-related risks associated with activities across the business value chain. Such activities include business expansion into new areas, the sourcing of key raw materials, and the control of business operations that may affect stakeholders. These measures aim to minimize risks that could result in adverse impacts on sensitive biodiversity, forest encroachment, or intrusion into legally protected areas designated for conservation, agriculture, or commercial purposes.

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## 5. Social Contribution

Give due consideration to and prevent potential impacts on the livelihoods of communities surrounding business operation sites or establishments, as well as on society at large. This includes impacts related to natural resources, the environment, pollution, safety, and overall well-being and public health. Business Partners shall also be committed to contributing to the improvement of quality of life and well-being of communities and society by engaging in socially beneficial and creative activities, as appropriate, in order to foster sustainable business growth alongside the community.

Announced on 1<sup>st</sup> JUNE 2026

(Mr. Hiromoto Takeda)  
Chief Executive Officer

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