

-Translate-

## **Business Code of Conduct for Partners**

### **Sky ICT Public Company Limited**

Sky ICT Public Company Limited ("Company") values ethical business practices and is committed to sustainable growth with accountability to stakeholders, social and environmental considerations under the Corporate Governance that values partner management. This policy covers approaches that promote integrity, fairness, compliance with the law, confidentiality, respect for human rights and environmental conservation. To achieve compliance with common values and create long-term benefits for both parties.

The company expects all partners to understand and follow this approach to promote transparent and lasting relationships that will lead to long-term common success.

## **Business Code of Conduct for Partners**

A business code of conduct for partners is a guideline or guidelines established by companies to build good relationships and a common code of conduct with partners and business partners, with the aim of creating transparency, fairness and clear ethical standards for doing business together to create sustainable growth along the way.

Please read and understand the contents of the Code of Business Conduct for Partners, and acknowledge, including, the Conduct of Business Conduct Policy for Partners, to signify consent to comply, which is an important standard in virtuous and ethical joint business practices.

### **1. Compliance with laws and rules**

Partners must strictly abide by business-related laws, rules, regulations and standards, including respect for human rights and employees' freedom of expression; be an integral part of the business code of conduct for partners, in order to build credibility, safety and reduce legal and ethical risks in joint business operations.

#### **1.1 Follow local and international laws**

Partners must comply with the laws of countries in which international business and exports are conducted, such as labour law, environmental law, consumer protection law and intellectual property law.

#### **1.2 Corruption prevention and bribery**

Partners must avoid engaging in bribery, whether giving or receiving, for the sake of business, and must encourage transparent and fair business practices, including compliance with laws related to anti-corrupt corruption, anti-unfair business competition, which

encompasses extortion, embezzlement, fraud, or retrenchment payments, party play, crusading.

### **1.3 Compliance with safety and health requirements**

Partners must comply with employee occupational safety and hygiene standards, as required by law, to prevent harm and promote a good working environment.

### **1.4 Respect for intellectual property**

Partners must not infringe on intellectual property such as patents, copyrights and trademarks, as well as require measures to protect the personal data of customers and those involved.

### **1.5 Protection of personal data**

1.5.1 Compliance with Personal Data Protection Act - Partners must comply with laws and requirements related to personal data protection, such as the Personal Data Protection Act of Thailand, as well as other regulations in the country of business.

1.5.2 Secure Storage and Processing of Personal Data - Partners must have measures to store and process personal data to be secure, prevent unauthorized access, including data encryption, use of appropriate security protection systems, and backup.

1.5.3 Restricting access to information - Personal information should restrict access only to personnel with relevant duties to prevent misuse or improper use of the information.

1.5.4 Notification in the case of a data leak - In the event of a personal data leak, partners must have an immediate notification procedure provided to those affected, and cooperate with the relevant authorities in dealing with such issues.

## **2. Quality and standards of goods and services**

Maintaining the quality and standards of goods and services is what enables partners to build the trust of customers and organizations doing business together in a sustainable manner. Both strengthen a positive image and result in long-term business growth.

### **2.1 Maintaining production quality standards**

Partners must produce and deliver quality goods or services as specified in contracts and technical specifications such as ISO standards, safety standards, environmental standards, biohealth standards and other international standards.

### **2.2 Regular quality monitoring**

Partners must have procedures to monitor and control the quality of goods in all production processes, ensuring that the goods shipped meet the prescribed quality and are not impaired.

## **2.3 Ensuring the safety of goods and services**

Partners must ensure that goods or services are safe to users, do not cause harm or damage to health, including, traceability and disclosure of sources of raw materials, products, services, as well as certification of quality and safety standards of products and services.

## **2.4 Professional management of customer complaints**

Partners should have an effective complaint management system to hear and resolve product quality issues quickly, as well as bring information from complaints to improve future work processes.

## **3. Honesty and transparency in business operations**

Partners must conduct business with integrity, non-corruption, transparent operations, and avoid having conflicts of interest with the company, including not unlawfully using the company's internal secrets. The integrity and transparency practices in the business code of conduct are as follows:

### **3.1 Practice faithfully**

Partners must be honest in their communications, preparation of reports, and bidding or offering, not disinformation or providing false information to obtain business interests.

### **3.2 Conflict of interest avoidance**

Partners must avoid situations that may lead to conflict of interest, such as using a position of duty in a way that may cause unfairness; partners or organizations doing business together should be informed if they find that there are situations that may cause conflict of interest.

### **3.3 Prevention of bribery and corruption**

Partners shall not accept or bribe, or anything in return that may cause unfairness in business decisions, including measures to regulate and prevent such behavior.

### **3.4 Transparency in transactions**

Transactions must be transparent, verifiable, and partners must provide complete and accurate business records such as contracting, procurement, and financial reporting.

### **3.5 Actual disclosure**

Partners must disclose truthful information about products and services, including the quality of goods or services, potential risk disclosure, and quality guarantees, in order to achieve confidence in doing business together.

### **3.6 Respect for contracts and agreements**

Partners must comply with contracts and agreements signed together, without avoiding or seeking loopholes for personal gain.

### **3.7 Confidential information treatment**

Partners shall not take any information of the Company that is of a confidential nature or is information that is not intended to be made public, to be used for the personal benefit of the Partners, or any employee, or any other stakeholder person of the Partners, or for any purpose other than that specified by the Company.

## **4. Fair treatment of labour**

Partners must treat workers in accordance with relevant labour laws and standards. The company focuses its partners on treating workers with respect, providing equal rights and opportunities, and creating a fair, safe working environment and promoting the quality of life of employees, including basic human rights practices, by the Fair Treatment of Labour Guidelines in the Business Code for Partners. It consists of

### **4.1 Implementation of human rights principles**

Partners should respect the right of employees to express their views and talk at work, have freedom of association, without fear of punishment or discrimination from expressing different opinions, as well as promote the right to life, have freedom of thought, speech, belief, religion, life security, diversity, coexistence and equality, without discrimination.

### **4.2 Non-discrimination, equality and the promotion of equality**

Partners must provide equality in employment and promotion processes, regardless of racial, racial, religious, disability or social status differences and political ideas.

Partners must treat all employees fairly, not discriminate on grounds of race, religion, gender, age, disability, political opinion or social status, and promote an environment that provides equal opportunities for employment, training and development.

### **4.3 Fair employment**

Partners must take care to provide employment and employment in an ethical, transparent, verifiable manner and to establish fair labour and termination contracts, in accordance with labour law, including providing wages consistent with the work done, with reasonable working hours, as well as with welfare appropriate to the subsistence of employees.

Partners must set working hours in line with local labour laws, and avoid having employees work beyond a reasonable time; legal vacations must be arranged and work-life balance promoted.

Partners must pay wages of not less than the minimum wage required by law and should consider providing adequate compensation for their subsistence, including providing

basic welfare benefits such as health insurance, occupational safety and other benefits in accordance with standards.

#### **4.4 Prevention of child labour and forced labour**

Partners must respect the rights and treat different groups of workers fairly, such as women workers, pregnant women workers, elderly workers, workers with disabilities, must not use child workers below the minimum legal age in each country, and forced workers in production or services, along with providing an age monitoring system to prevent violations of children's rights, as well as to comply with international labour standards, including providing an environment conducive to work, not endangering health and safety.

Partners must not use forced labour in all its forms, whether slave labour, labour under duress, or confiscation of the personal documents of employees; all workers must be guaranteed voluntarily to work and be treated with human dignity.

#### **4.5 Fair handling of employee complaints**

Partners should have a channel for employees to make complaints, cases of trouble or unfair treatment, and handle these complaints in a transparent and fair manner.

#### **4.6 Support for employee freedom**

Partners shall respect the right of employees to form or join a trade union, or labour representative organization, or any other combination as permitted by law, including the right to engage in lawful bargaining, without interference or intimidation.

### **5. Safety, Occupational Health and Working Environment**

Partners must provide a work environment for employees and related personnel to be supervised in safety, health, and a good work environment to prevent accidents and diseases that may occur at work, including promoting employee well-being. Guidelines on safety, occupational health, and the work environment in the Business Code of Conduct for Partners include:

#### **5.1 Creating a secure working environment**

Partners must provide measures to control accident risk in the workplace, such as the provision of non-hazardous workplaces, the installation of hazard prevention tools or equipment and the training of employees on how to safely perform their tasks.

#### **5.2 Accident prevention and risk assessment**

Partners must have a regular workplace risk assessment and provide a plan to prevent potential accidents, including the provision of equipment and tools needed for first aid in case of an accident.

### **5.3 Addressing health risk factors in the workplace**

Partners must address risk factors that can affect workplace health, such as noise pollution, particulate matter, and chemicals, including the use of technologies and tools that reduce exposure to these substances.

### **5.4 Having a clear health and safety policy**

Partners should have clear health and safety policies and requirements, as well as impose penalties for violations to keep employees in strict compliance.

### **5.5 Monitoring and evaluation of compliance with security standards**

Partners should have regular safety policy compliance inspections and evaluations, such as hazard protection equipment inspections, staff health inspections, and risk assessments in each department.

### **5.6 Epidemic prevention and management and health emergencies**

In the event of a disease outbreak or health emergency, such as COVID-19, partners must have measures to prevent and control the epidemic in the workplace, such as distancing, wearing a sanitary mask, and regular cleaning of workspaces.

## **6. Environmental responsibility**

Realizing that business success must be coupled with environmental responsibility, the company expects its partners to conduct their business with environmental responsibility in all dimensions:

### **6.1 Energy consumption and climate change**

Partners must use energy efficiently, promote the use of clean or renewable energy, and take action to reduce carbon and greenhouse gas emissions from ongoing operational processes.

### **6.2 Water Use and Biodiversity Conservation**

Partners must administer effective water use, prevent contamination of natural water resources and avoid carrying out activities that affect ecosystems and biodiversity.

### **6.3 Environmental and pollution management**

Partners must have appropriate environmental management systems, strictly comply with environmental laws and requirements, including implement effective air, water and soil pollution emission control measures.

### **6.4 Waste reduction and sustainable use of resources**

Partners must use natural resources cost-effectively, implement waste reduction measures from the design, production and transportation stages, including promoting the reuse and recycling of materials.

## **7. Preparation and communication of business ethics**

### **7.1 Creation of business ethics documents**

Partners must produce clear documents or business ethics manuals, covering all relevant areas such as integrity, accountability, compliance with the law and respect for human rights.

### **7.2 Communications**

The business code of conduct must be clearly communicated to all commercial partners, including employees at all levels in the organization; so that everyone understands and strictly follows it.

## **8. Training and development**

### **8.1 Training for employees and partners**

Partners should have training in business ethics, and related requirements help employees and commercial partners recognize the correct course of action.

### **8.2 Awareness of laws and regulations**

Partners should provide training to educate employees on relevant laws such as labour law, personal data protection law and other laws affecting business practices.

## **9. Monitoring and follow-up**

### **9.1 Practice assessment**

Partners should have a monitoring system, and follow-up of the code of conduct in the organization and from commercial partners, to ensure that all parties comply effectively.

### **9.2 Internal audit**

Partners should have an internal audit process to prevent violations of the code of conduct, such as auditing ethical standards, handling personal information, or meeting safe work standards.

## **10. Complaints and whistleblowers**

### **10.1 Establishing secure complaint and whistleblowing channels**

Partners must provide complaint and whistleblowing channels to stakeholders, able to provide a variety of whistleblowing, such as easily and conveniently accessible phones, emails, or online systems, so that the informant can choose the most convenient and secure channels.



Partners must report to the company on situations that may affect non-compliance with this Code of Business Conduct for Partners.

## 10.2 Whistleblower protection

Partners must make a promise of whistleblower confidentiality, to prevent private information or information about whistleblowing from being revealed.

## 10.3 Communication of whistleblowing

With its commitment to transparent business, it seeks the cooperation of its partners, commercial partners, or any other person who is a stakeholder or involved in the conduct of its business. Please take care to prevent all forms of corruption and report to the company **immediately** any known wrongdoing, rules, regulations, unethical or ethical acts, embezzlement, corruption, etc., whether committed by employees or other persons involved, whether actual or suspicious incidents, which may damage the company and related parties through the following channels.

1.  [whistle-blower@skyict.co.th](mailto:whistle-blower@skyict.co.th)
  
2.  Audit Committee, Sky ICT Public Company Limited No. 55, A.A.Capitol Ratchada Building, 6th-7th Floor, Ratchadapisek Road, Red Din District, Red Din District, Bangkok 10400
  
3.  On website - <https://www.skyict.co.th/whistle-blowing>

Partners must communicate to employees, partners, or those involved in the company's whistleblowing channels as outlined above. The company encourages all stakeholders to make complaints or whistleblowing without concern from retaliation by those reported. Complainants are protected without penalty and do not allow for good faith bullying or retaliation against complainants. All monitoring procedures are supervised only by those involved and the information is kept confidential.

Also, require a regular review of the Code of Business for this trading partner, at least once a year, or where there are reasonable grounds.





To take effect from 14 November 2025 onwards.

-SOMKIT LERTPAITHOON-
(PROF. DR. SOMKIT LERTPAITHOON)
Chairman Approved by the Board of Directors Meeting No. 9 / 2025 On November 13, 2025



**The acceptance certificate is signed, acknowledged and observed.**

The name of the company / entity / or name-genus of the partners \_\_\_\_\_  
has read and acknowledged the Code of Business for the partners of Sky ICT Public  
Company Limited and will notify the employees, employees, as well as those involved to  
acknowledge and comply with the spirit of this Code of Business.

(Signed) \_\_\_\_\_

( \_\_\_\_\_ )

Position \_\_\_\_\_

Date \_\_\_\_\_