

**APPROVED BY THE BOARD OF DIRECTORS**

**OWNER: PROCUREMENT DEPARTMENT MANAGER**

**EFFECTIVE DATE: 1 April 2025**

## **Supplier Code of Conduct**

By engaging in business with Interthai Pharmaceutical Manufacturing Limited (“IPML”), all suppliers are required to adhere to this Supplier Code of Conduct, which defines the minimum ethical, social, environmental, and governance standards expected across our supply chain. The Code is aligned with leading international frameworks, including the UN Guiding Principles on Business and Human Rights (UNGPs), OECD Guidelines for Multinational Enterprises, UN Convention Against Corruption (UNCAC), ILO Core Conventions, Pharmaceutical Supply Chain Initiative (PSCI), SEDEX/SMETA, Forest Stewardship Council (FSC), EU Ecolabel and other sustainability frameworks.

Suppliers must ensure compliance throughout their operations and supply chains, communicate these standards to employees and subcontractors, and maintain transparent records.

### **1. Compliance & Governance**

- Adhere to all applicable laws and regulations, including labor, environmental, health & safety, data privacy, and anti-corruption laws.
- Maintain all required licenses, permits, and registrations.
- Apply the highest protection standard when local law and this Code overlap.
- Implement effective due diligence, monitoring, and remediation processes.

### **2. Business Ethics & Integrity**

- Prohibit bribery, corruption, extortion, facilitation payments, and money laundering.
- Avoid conflicts of interest and ensure fair competition.
- Support IPML’s No Gift Policy and avoid offering or accepting undue advantages.
- Maintain accurate financial records, transparent reporting, and respect intellectual property rights.

### **3. Labor & Human Rights**

- Respect human rights and labor rights in line with ILO conventions (29, 87, 98, 100, 105, 111, 138, 182).
- Prohibit forced labor, child labor, human trafficking, and retention of worker documents.
- Provide fair wages, legal working hours, benefits, and voluntary overtime.
- Ensure a workplace free of harassment, discrimination, or abuse.
- Respect freedom of association and collective bargaining.

### **4. Environment, Health and Safety (EHS)**

- Provide safe, healthy, and hygienic workplaces, in line with ISO 45001 and Thai OSH laws.
- Properly handle, store, and dispose of hazardous substances in compliance with the Factory Act.
- Minimize environmental impacts by reducing emissions, energy use, water consumption, and waste.

- Implement ISO 14001 EMS or equivalent and pursue certification where applicable.
- Support climate change mitigation, biodiversity protection, and responsible resource use (e.g. FSC-certified materials, EU Ecolabel criteria).

## 5. Product Quality & Compliance

- Ensure all products meet agreed safety and quality standards, in compliance with PIC/S GMP, Thai FDA, and international standards.
- Promptly report quality or safety issues affecting IPML's products.

## 6. Data Protection & Confidentiality

- Safeguard confidential information and comply with the Thai PDPA and relevant data privacy laws.
- Prevent unauthorized use, disclosure, or misuse of data.
- Promptly notify IPML of any data breach or security incident.

## 7. Sustainable Procurement & ESG

- Ensure responsible sourcing of raw materials (including APIs, minerals, paper, packaging) aligned with OECD Due Diligence Guidance.
- Avoid materials linked to human rights abuses, deforestation, or conflict zones.
- Align with sustainability frameworks (PSCI, SEDEX/SMETA, EcoVadis, DJSI).
- Publicly disclose sustainability progress (GHG emissions, water, waste, social impacts).
- Promote circular economy, renewable energy, and community engagement initiatives.

## 8. Supply Chain Transparency

- Map and disclose supply chains upon request.
- Ensure traceability of raw materials and components.
- Conduct due diligence on subcontractors and suppliers to ensure alignment with this Code.

## 9. Business Continuity

- Maintain and regularly test Business Continuity Plans (BCPs) covering emergencies, natural disasters, cyberattacks, and pandemics.
- Ensure alternative sourcing, IT backup, and transparent communication with IPML in case of disruption.

## 10. Sanctions & Trade Restrictions

- Do not engage in business with sanctioned countries, entities, or individuals.
- Implement screening to ensure compliance with international sanctions regulations.

## 11. Reporting & Whistleblowing

- Provide secure and confidential reporting channels for employees and stakeholders.
- Ensure non-retaliation against whistleblowers acting in good faith.
- Reports related to IPML may be submitted to [IPML-COC@pharmaindustries.com](mailto:IPML-COC@pharmaindustries.com) or via IPML's Whistleblower channel.

## **12. Implementation & Continuous Improvement**

- Communicate this Code to employees, contractors, and supply chain partners.
- Conduct regular self-assessments, audits, and corrective actions.
- Share best practices and innovations supporting the UN SDGs and ESG goals.

### **Acknowledgement**

By doing business with IPML, suppliers commit to upholding the standards in this Code. IPML reserves the right to assess compliance, request improvements, and terminate relationships in cases of serious violation.

### **Authorized Supplier Representative:**

Name:	Date:
Company name:	Designated contact person for compliance matters:
Position:	Contact information:

**Annex: Compliance Areas and Illustrative Supporting Evidence**

Area	Key Expectations (Supplier Obligations)	Evidence / Documents Required
<b>Corporate Governance &amp; Ethics</b>	<ul style="list-style-type: none"> <li>Legal business registration</li> <li>Zero tolerance for bribery/corruption (UNCAC)</li> <li>Transparent grievance channels</li> </ul>	<ul style="list-style-type: none"> <li>Company registration certificate</li> <li>Anti-corruption policy</li> <li>Grievance/complaint logs</li> </ul>
<b>Labor &amp; Human Rights</b>	<ul style="list-style-type: none"> <li>No child/forced labor (ILO 29, 105, 138, 182)</li> <li>Freedom of association, collective bargaining (ILO 87, 98)</li> <li>Equal treatment &amp; non-discrimination (ILO 100, 111)</li> <li>Fair wages, hours, and contracts</li> </ul>	<ul style="list-style-type: none"> <li>Employee records (all categories incl. subcontractors, agency, migrant)</li> <li>Young worker forms (KorRor.2, KorRor.4)</li> <li>Wage &amp; time records (1 year)</li> <li>Disciplinary records</li> <li>Welfare/Union Committee minutes</li> </ul>
<b>Health &amp; Safety</b>	<ul style="list-style-type: none"> <li>Safe workplace &amp; risk prevention (ISO 45001)</li> <li>Safety training &amp; PPE</li> <li>Annual fire &amp; evacuation drills</li> <li>Emergency preparedness (fire, chemical, spills, flood, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>Safety policy &amp; manuals</li> <li>OHS Committee election &amp; minutes</li> <li>Fire drill &amp; evacuation training records</li> <li>Accident/near-miss reports</li> <li>Safety officer certificates</li> <li>Job Safety Analysis, risk assessments</li> </ul>
<b>Environment</b>	<ul style="list-style-type: none"> <li>Pollution prevention &amp; permits</li> <li>Waste management (hazardous, industrial, infectious)</li> <li>Efficient resource use (energy, water)</li> <li>Eco-friendly packaging (FSC, EU Ecolabel)</li> </ul>	<ul style="list-style-type: none"> <li>Environmental policy &amp; EMS (ISO 14001)</li> <li>Wastewater permits, air emission reports</li> <li>Waste manifests (SorKor forms)</li> <li>Groundwater usage permits</li> <li>Energy management reports</li> </ul>
<b>Management Systems</b>	<ul style="list-style-type: none"> <li>Social compliance policy &amp; training</li> <li>Internal audits &amp; corrective action</li> <li>Supply chain due diligence</li> </ul>	<ul style="list-style-type: none"> <li>Policies: Human Rights, Social Responsibility, Ethics</li> <li>Training records (induction, OHS, HR)</li> <li>Supplier/subcontractor audits</li> <li>Management review minutes</li> </ul>