



TPBI Sustainable Procurement Code of Conduct

1. Definitions

TPBI Group	means	TPBI Public Company Limited and its affiliated companies, comprising TPBI Public Company Limited (Head Office and Rayong Branch), TAK Packaging Co., Ltd., TMP Packaging Co., Ltd., TPBI International Co., Ltd., and TPBI Sunny Product (Thailand) Co., Ltd., including the subsidiaries under the consolidated financial statements of TPBI Public Company Limited.
Sustainable Procurement	means	the incorporation of environmental, social, governance, and human rights factors into consideration, in conjunction with factors of price, product quality, and the delivery of goods and services, in the organization's procurement processes and procedures, which not only provides financial value in terms of generating profit for the organization, but also creates benefits for society and the economy and reduces negative impacts on the environment.
Supplier	means	a distributor, contractor, service provider, lessor, or hire-purchase provider that delivers the products and services of TPBI Group.
Supplier Management	means	the systematic practice of building good engagement with suppliers in order to strengthen suppliers' potential so as to be ready to grow sustainably together, beginning from supplier selection, risk assessment, and supplier categorization; performance evaluation; relationship building and supplier development; including building participation in sustainable development in all dimensions—environmental, social, governance, and human rights—throughout the supply chain.

2. Significance

TPBI Group recognizes that Sustainable Procurement is an important process that helps improve the quality of products and services, supports cost management, and promotes the efficient and cost-effective use of resources in production, delivery, use, consumption, and waste disposal processes throughout the product life cycle. It also helps enhance brand value and demonstrates responsibility to all stakeholder groups throughout the supply chain. Therefore, TPBI Group is committed to implementing Sustainable Procurement and supply chain management in compliance with applicable laws, regulations, and relevant standards at both national and international levels, in alignment with the United Nations Sustainable Development Goals (SDGs) and TPBI Group, as well as the principles



of good corporate governance and the Code of Business Conduct. TPBI Group also adheres to the principles of integrity, transparency, and accountability, while taking into consideration environmental impacts, social responsibility, community, governance (ESG), and human rights. TPBI Group promotes procurement practices that ensure fair competition in order to enhance the competitiveness of TPBI Group and its Suppliers, enabling Suppliers to enhance their capability and efficiency and achieve sustainable growth together with TPBI Group.

3. Scope of the Policy

This Policy covers all operations of TPBI Group, its subsidiaries, and joint ventures, including the activities of directors, executives, and employees.

4. Objectives

To provide executives and employees with guidelines for Sustainable Procurement and Supplier Management throughout the supply chain, including participation in encouraging Suppliers to comply with the TPBI Supplier Sustainable Code of Conduct.

5. Duties and Responsibilities

5.1 Executive Committee

- 5.1.1 Consider approving and reviewing the Sustainable Procurement Policy and guidelines.
- 5.1.2 Oversee business operations to ensure compliance with applicable laws, regulations, rules, policies, and related guidelines, as well as the effective implementation of the Policy in practice.

5.2 Executives

- 5.2.1 Establish objectives, targets, and key performance indicators for Sustainable Procurement.
- 5.2.2 Establish criteria, standards, and operating procedures appropriate to the business context, in accordance with the Sustainable Procurement Policy and guidelines.
- 5.2.3 Establish an appropriate organizational structure, responsible persons, and roles and responsibilities.
- 5.2.4 Establish criteria for the consideration and selection of Suppliers to ensure transparent Supplier screening and operations in accordance with the TPBI Supplier Sustainable Code of Conduct, including sustainable development goals.
- 5.2.5 Promote and support business operations in compliance with TPBI Group's policies and guidelines, as well as applicable laws, regulations, rules, and relevant standards.
- 5.2.6 Assess and manage Sustainable Procurement risks throughout the supply chain to ensure internal controls and business operations are conducted in accordance with the Policy and guidelines.
- 5.2.7 Communicate the Policy and guidelines to create awareness among executives and employees at all levels.
- 5.2.8 Provide whistleblowing channels relating to Sustainable Procurement, including protection measures for whistleblowers and complainants.



5.2.9 Monitor, manage, and support compliance with laws, policies, guidelines, requirements, and standards.

5.2.10 Review reports on Sustainable Procurement performance throughout the supply chain.

5.3 Department or Person Responsible for Procurement

5.3.1 Assess and manage risks related to the procurement of products and services, and Supplier Management.

5.3.2 Develop an effective Sustainable Procurement management plan throughout the supply chain in accordance with the policies, guidelines, and strategies of TPBI Group.

5.3.3 Establish criteria and procedures for Supplier selection in accordance with the principles of corporate governance, the Code of Business Conduct, and the sustainable development goals of TPBI Group.

5.3.4 Establish effective internal control and audit processes for procurement operations.

5.3.5 Evaluate Sustainable Procurement management performance on a continuous basis, covering criteria, selection methods, and contract management.

5.3.6 Promote awareness of, and provide guidance on, Sustainable Procurement to personnel and stakeholders throughout the supply chain.

5.3.7 Prepare reports on Sustainable Procurement performance.

5.4 Employees

5.4.1 Learn, understand, and comply with applicable laws, regulations, rules, standards, policies, and guidelines.

5.4.2 File complaints or report concerns when any violation or potential violation of this Policy is identified.

6. Guidelines

6.1 Procure products and services with consideration for value for money, efficiency, and effectiveness in terms of quality, safety, and price.

6.2 Promote and support the procurement of products and services with honesty, transparency, and fairness, in compliance with laws, regulations, and standards, as well as the principles of corporate governance and the Code of Business Conduct, while taking into consideration environmental, social and governance impacts, human rights, labor practices, and occupational health and safety.

6.3 Promote and support the procurement of environmentally friendly products and services, including supporting Suppliers in environmental management, the development of innovative technologies that contribute to energy conservation, the reduction of pollution and greenhouse gas emissions, and the development of effective waste management systems.

6.4 Promote and support the procurement of products and services from local and domestic Suppliers located in the areas where the business operates in order to promote the economy, create employment, and generate income for local people.



- 6.5 Select Suppliers in a transparent, fair, and verifiable manner, and consider Suppliers with capabilities in environmental, social, governance, and human rights performance.
- 6.6 Conduct supplier classification, assess Supplier operational risks that may impact the environment, society, governance, and human rights, and establish mitigation measures to reduce potential impacts throughout the supply chain.
- 6.7 Treat Suppliers equally, without discrimination, and respect human rights; refrain from violating intellectual property rights; protect confidential information and personal data; and prevent corruption.
- 6.8 Communicate the details of TPBI Group's requirements (TOR) and contract terms and conditions to Suppliers to ensure mutual understanding, completeness, accuracy, equality, and transparency.
- 6.9 Encourage Suppliers to implement Sustainable Procurement and supply chain management with their own suppliers.
- 6.10 Foster collaboration and strengthen Supplier capabilities to enable them to compete and develop products and services that are environmentally, socially, ethically, and human rights responsible.
- 6.11 Build engagement and maintain good relationships with Suppliers in accordance with TPBI Group's sustainable development approach.
- 6.12 Monitor and conduct audits of Suppliers' sustainability performance based on significance and risk level to ensure that Suppliers deliver products and services in accordance with contractual requirements and the Supplier Code of Business Conduct.
- 6.13 Communicate and continuously raise awareness of Sustainable Procurement among employees, Suppliers, business partners, consumers, and stakeholders.
- 6.14 Disclose information and performance results relating to Sustainable Procurement in the Sustainability Report or other relevant disclosure reports to stakeholders on an annual basis.
- 6.15 Prevention of Money Laundering
 - 6.15.1 TPBI Group is committed to preventing TPBI Group from being used as a source of money laundering by maintaining accounts and assets in compliance with applicable laws and by protecting the business from involvement, whether intentional or unintentional, in any unlawful activities.
 - 6.15.2 Executives and employees must conduct lawful business with reliable and reputable Suppliers and use funds with traceable sources.
 - 6.15.3 Executives and employees must be alert to warning signs indicating potential money laundering activities. Examples include requests from Suppliers to make payments to third parties, to make payments through multiple accounts, to make large and suspicious cash or cash-equivalent payments, a willingness to pay above market prices without reasonable justification, or making payments through intermediaries without necessity. If such behavior is identified, it must be reported to the Audit Committee for consideration before proceeding further.



6.15.4 Executives and employees must immediately notify the Audit Committee upon becoming aware of any behavior that may fall within the indicators of money laundering.

6.16 Conflicts of Interest

There shall be no Conflicts of Interest arising from the procurement process, which may occur when an employee places greater importance on personal benefits than the interests of TPBI Group, or engages in reciprocal business practices, including the use of authority delegated by TPBI Group in the capacity of a purchaser to solicit any benefit from a Supplier, such as benefits that may influence the employee's decision regarding Supplier selection, product and/or service selection, or negotiations to finalize a purchase order with a Supplier. In this regard, compliance with the TPBI No Gift Policy of TPBI Group is required.

6.17 Treatment of Insider Information

Employees must maintain the confidentiality of TPBI Group information and are responsible for safeguarding documents and information relating to the procurement process, such as technical information, materials, documents, important operational documents that enable TPBI Group to maintain its competitive business advantage, Supplier price quotations, technical and price comparison documents, and contracts, all of which are considered confidential information of TPBI Group and must not be disclosed to any other person.

6.18 Communication Ethics

Employees must place great importance on communication ethics and shall comply with the following practices:

6.18.1 Information of TPBI Group shall not be provided, nor business communications conducted with Suppliers, through a Supplier's personal e-mail address under any circumstances, unless approved by the relevant department manager of TPBI Group.

6.18.2 Office telephone numbers, approved mobile telephone numbers, and TPBI Group e-mail addresses shall be used solely for TPBI Group business communications.

6.18.3 Employees are authorized to provide only information directly related to their responsibilities to Suppliers. Disclosure of TPBI Group information outside an employee's area of responsibility without authorization shall be deemed a violation of this Code.

6.18.4 Employees should require Suppliers to communicate only in accordance with the communication arrangements established by TPBI Group.

7. Training

Communication and dissemination of the Sustainable Procurement Policy and guidelines shall be conducted through training, meetings, or other appropriate activities for directors, executives, employees, and external stakeholders, including Suppliers, business partners, and the public throughout the supply chain. The effectiveness of each training session shall also be evaluated after completion.

8. Whistleblowing

Any person who discovers or becomes aware of any act that is believed to be a violation of this Policy and guidelines shall file a complaint or report such matter in accordance with the Whistleblowing Policy and guidelines.



In this regard, complainants and whistleblowers shall be protected, and their information shall be kept confidential, without any impact on their employment position, both during the investigation process and after the completion of the process. The reporting channels are as follows:

- Channel 1 Complaint in person at the head office
TPBI Public Company Limited
42/174 Moo 5, Soi Srisathiannivet, Rai Khing Subdistrict, Sam Phran District,
Nakhon Pathom Province 73210
- Channel 2 Complaint made in writing
Company Secretary Department, TPBI Public Company Limited
42/174 Moo 5, Soi Srisathiannivet, Rai Khing Subdistrict, Sam Phran District,
Nakhon Pathom Province 73210
- Channel 3 Complaint by telephone or facsimile
Telephone 0-2429-0354-7 ext. 501 or Facsimile 0-2429-0358
- Channel 4 Complaint through the Company's website (www.tpbigroup.com)
- Channel 5 Complaint by email
Audit Committee: ac@tpbigroup.com / hotline@tpbigroup.com
Investor Relations: ir@tpbigroup.com
Company Secretary: company_secretary@tpbigroup.com
- Channel 6 Suggestion boxes for employees

(Further details are provided in: SD-SEC-CN-014 Whistleblowing and Complaints Policy)

9. Disciplinary Actions

In the event of an investigation, all employees shall fully cooperate with both internal and external parties. If any executive or employee commits any act that violates or fails to comply with this Policy, whether directly or indirectly, such executive or employee shall be subject to disciplinary action in accordance with the work rules and regulations and may be subject to legal proceedings.

Announced on 26 November 2025

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(Ms. Chamaiporn Uapairojkij)

Chief Executive Officer

TPBI Public Company Limited Group