

---

**SUMISHO METAL**

Thailand

---

# **Business Code of Conduct**

**Sumisho Metal (Thailand) Co., Ltd.**

## Table of Contents

Topic	Page
Message from the Board of Directors	
Company Vision	1
Mission Statement	1
Business Operation and Sustainable Development Policy	1
Business Code of Conduct	2
❖ Employee Code of Conduct	2-3
❖ Customer Code of Conduct	3
❖ Supplier Code of Conduct	3-4
❖ Code of Conduct toward Government Agencies, Society, and Environment	4
❖ Respect for Human Rights	5-8
❖ Environmental Protection	8-9
❖ Maintaining Responsible Business Practices	9-11
❖ Financial Responsibility and Accurate Recordkeeping	11-12
❖ Prevention of Sexual Harassment	12
❖ Duties of Directors, Executives, and Employees	12-14
❖ Conduct and Treatment of Other Employees	14
❖ Guidelines When in Doubt or Facing Issues	14
❖ Oversight of Compliance Implementation	15
❖ Whistleblowing and Reporting Misconduct	15
❖ Respecting and Protecting Intellectual Property Rights	15-16
❖ Use of Computers and Information Technology	16
❖ Protection of Personal Data	16-17

## Message from the Board of Directors

To: Directors, Executives, and All Employees

Sumisho Metal (Thailand) Co., Ltd. has always conducted its business with integrity, transparency, and social responsibility, in line with the principles of good corporate governance. This philosophy has enabled the company to grow sustainably and earn recognition from customers, business partners, employees, government agencies, and all stakeholders.

The Board of Directors has established and updated the Business Code of Conduct to ensure that all executives and employees are aware of, understand, and consistently apply these guidelines in their work. This serves to strengthen efficiency, transparency, and the credibility of the organization.

Our Code of Conduct is the foundation of our collaboration and represents the company's positive image. It reflects the values of honesty, respect, and responsibility. Each of us plays a role in protecting the company's reputation and in creating a safe, inclusive, and standards-compliant working environment. By consistently adhering to these principles, we build trust among customers, partners, colleagues, and society—trust that is vital to driving the company's growth and long-term stability.

On behalf of the Board of Directors of Sumisho Metal (Thailand) Co., Ltd., we urge everyone to uphold and follow this Code of Conduct, so that together we can continue to develop our organization sustainably into the future.



(Mr. Hideyuki Kobayashi)  
Managing Director

Sumisho Metal (Thailand) Co., Ltd.

## Company Vision

Sumisho Metal (Thailand) Co., Ltd. strives to be the leading provider of steel processing services and to achieve sustainable growth.

## Mission Statement

To contribute to the growth of the Thai economy by upholding the company's core values:

- Safety First : Safety is our top priority.
- Exclusivity : Dedicated to being the "one and only" trusted partner for our customers.
- Comprehensive Service: Delivering value-added and end-to-end services.
- Integrity : Acting with honesty and maintaining the company's standards and commitments to customers.
- Empathy : Respecting and understanding each other's feelings.
- Unity : Working together as "Team SMTL."
- Ownership Mindset : Demonstrating love for the organization and taking full responsibility for one's work.

## Business Operation and Sustainable Development Policy

1. Operate under both short-term and long-term strategies The company develops strategies for business growth in both the short and long term, while maintaining flexibility to adapt to internal and external risks comprehensively.
2. Operate with transparency The company adheres to transparent and accountable business practices, guided by ethics and anti-corruption principles at every stage of operations.
3. Operate with consideration for stakeholders The company emphasizes minimizing or eliminating negative impacts on stakeholders, both directly and indirectly.
4. Operate with environmental responsibility The company manages natural resources efficiently and fosters awareness to minimize or eliminate adverse impacts on the environment and surrounding communities.

## Business Code of Conduct

To ensure that the business operations of Sumisho Metal (Thailand) Co., Ltd. are conducted lawfully, ethically, and in alignment with the principles of good corporate governance, the company has developed and disseminated this Business Code of Conduct. It serves as a strict guideline for directors, executives, employees, and all related parties to acknowledge and adhere to in their work.

This Code of Conduct also forms part of the **Compliance Policy** established by the parent company, ensuring consistent practices across all affiliated entities. The shared objective is to foster transparency, credibility, and social responsibility in every stage of business operations.

### ❖ Employee Code of Conduct

Employees are regarded as the company's most valuable resource and a key factor in its success. Therefore, Sumisho Metal (Thailand) Co., Ltd. is committed to fostering a strong organizational culture, a positive working environment, and teamwork. The guidelines are as follows:

#### 1. Basic Working Conditions

- Strictly comply with the Labor Protection Act and all relevant laws.
- Prohibit forced labor, child labor, and all forms of discrimination.
- Respect employees' rights to freedom of association and collective bargaining in accordance with international human rights principles.

#### 2. Equal Opportunity and Diversity

- Recruitment and promotion are based on ability and performance.
- No discrimination on the grounds of race, religion, gender, age, disability, or beliefs.
- Promote diversity and inclusion among all employees.

#### 3. Prevention of Harassment and Abuse

- Prohibit harassment, bullying, or any form of workplace violence.
- Provide safe and confidential reporting channels so employees can report incidents without fear of retaliation.

#### 4. Fair Wages and Benefits

- Pay wages and provide benefits not less than those required by law and in line with labor standards.
- Consider compensation based on company performance and individual employee performance.
- Establish a transparent and fair evaluation system to ensure employees are rewarded appropriately and motivated.

#### 5. Health and Safety

- Maintain a safe working environment that protects life and property.
- Provide annual health check-ups and health insurance for employees at all levels.

- Continuously conduct safety training and emergency preparedness programs.
- Encourage employee participation in developing a safe and sustainable workplace environment.

#### **6. Prevention and Control of Substance Abuse**

- Prohibit the use, possession, or consumption of narcotics and alcohol in the workplace.
- Support counseling and rehabilitation programs for employees facing substance abuse issues.
- Promote awareness campaigns to prevent substance abuse within the organization.

#### **❖ Customer Code of Conduct**

Sumisho Metal (Thailand) Co., Ltd. is committed to creating customer satisfaction and building trust. The company has established the following guidelines:

##### **1. Quality and International Standards**

- The company implements an internal quality management system and obtains international certifications such as ISO 14001:2015, IATF 16949:2016, and other standards as requested by customers, ensuring that all products and services meet internationally recognized quality benchmarks.

##### **2. Employee Development**

- Provide continuous training and skill development to enable employees to work effectively and meet customer needs.

##### **3. Integrity and Transparency**

- Avoid exploiting customers; provide accurate, complete, and up-to-date information.
- Prevent any distortion of facts regarding quantity, quality, trading conditions, or services.

##### **4. Customer Confidentiality**

- Establish strict measures to safeguard customer confidentiality.
- Prohibit the use of customer information for personal benefit or disclosure without authorization.

#### **❖ Supplier Code of Conduct**

Sumisho Metal (Thailand) Co., Ltd. has a policy of treating all suppliers fairly and equitably. The company has established the following guidelines:

##### **1. Quality and International Standards**

- Implement a quality management system certified by international standards such as ISO 14001:2015 and IATF 16949:2016, to ensure that operations involving suppliers comply with globally recognized requirements and standards.

## **2. Supplier Development**

- Encourage and support suppliers to align with the company's criteria and expectations, in order to meet customer requirements and relevant quality system standards.

## **3. Integrity, Transparency, and Fair Trade**

- Avoid exploiting suppliers in selection, negotiation, or business operations.
- Provide accurate, complete, and non-misleading information.
- Prohibit soliciting or accepting improper benefits in business dealings.
- Ensure payments for goods and services are made in accordance with mutually agreed terms.
- Commit to supporting suppliers so they can operate alongside the company in a stable and fair manner.

### **❖ Code of Conduct toward Government Agencies, Society, and Environment**

Sumisho Metal (Thailand) Co., Ltd. consistently recognizes that the company is an integral part of society, with responsibilities to support communities and contribute to social development. The company actively promotes community activities to improve quality of life and strengthen local economies.

We firmly believe that sustainable growth and long-term survival in society depend not only on delivering quality products and conducting business with integrity, but also on taking responsibility for the betterment of society as a whole. Therefore, the company has established the following guidelines:

#### **1. Compliance with Laws and Regulations**

- Conduct business in strict accordance with local laws and regulations.
- Instill a sense of social and environmental responsibility in employees at all levels.
- Regularly review and improve operations to prevent negative impacts on communities and society.

#### **2. Anti-Corruption**

- Comply with government policies on anti-corruption in both the public and private sectors.
- Avoid any actions or expressions that could be misunderstood as supporting or being involved in corruption.
- Prohibit the use of company assets or resources to support unlawful activities.

#### **3. Bribery and Gifts**

- Do not support bribery of government agencies for business advantage.
- The giving of gifts or other items must comply with laws, regulations, or official announcements of government agencies, and must be consistent with customary practices only.

## ❖ Respect for Human Rights

Sumisho Metal (Thailand) Co., Ltd. respects the rights of employees and all stakeholders, without discrimination based on ideology, race, color, religion, gender, age, nationality, or any other status related to human rights. The company is committed to applying fair and inclusive human rights principles in its business operations, while eliminating injustice, discrimination, intimidation, and all forms of rights violations. The guidelines are as follows:

### 1. Compliance with Laws and Duties

- Employees at all levels must understand the laws relevant to their duties and responsibilities, and strictly comply with them.
- If uncertain, employees must consult their supervisors and must not act based solely on personal interpretation without proper guidance.

### 2. Adherence to International Human Rights Principles

- The company strictly complies with international human rights principles.
- Provide employees with knowledge and understanding of international human rights standards.
- Do not support any activities that violate human rights within the organization.

### 3. Equal Treatment and Respect

- Employees at all levels must treat one another with respect and dignity.
- No discrimination based on physical or mental condition, race, religion, gender, language, age, color, education, social status, or any other differences.
- All employment processes—including recruitment, hiring, compensation, evaluation, training, and development—must be conducted fairly and without discrimination.

### 4. Prohibition of Forced Labor and Rights Violations

#### 4.1 Prohibition of Child Labor

The company has a strict policy against child labor under all circumstances and will not employ individuals below the legal working age. The company will take the following actions:

- Do not employ children under the age of 15 in any form.
- Verify the age of job applicants using official government documents before employment.
- Do not hire workers below the minimum age as stipulated by labor laws.
- In cases where child labor is unintentionally discovered, the company will take appropriate corrective action with the child's best interests as the primary consideration.

- Require contractors and business partners to comply with the same child labor prohibition policy.
- Conduct regular monitoring and inspections to ensure compliance with this policy.

#### **4.2 Prohibition of Forced Labor**

The company does not accept any form of forced labor, including labor resulting from coercion, threats, confinement, or restriction of employees' freedom. The company will take the following actions:

- Do not retain employees' personal documents such as identification cards or passports.
- Overtime work must be voluntary.
- Employees have the right to resign in accordance with company procedures without unfair penalties.
- Do not employ labor resulting from human trafficking or any form of forced labor.
- Ensure that contractors and business partners comply with the same standards.

#### **4.3 Ethical Recruitment**

The company places great importance on transparent, fair, and respectful recruitment practices that uphold the dignity of job applicants. The company has established the following guidelines:

- Do not charge any fees or expenses to job applicants.
- Recruitment must be conducted based on equality and non-discrimination.
- Information regarding job positions, wages, and working conditions must be clear and transparent.
- The company will monitor and ensure that employment agencies or contractors involved comply with ethical recruitment standards.

#### **4.4 Freedom of Association and Collective Bargaining**

The company respects employees' rights to organize, express opinions, and participate in labor union activities as permitted by law. The company will take the following actions:

- Respect employees' rights to join or not to join labor unions.
- Refrain from any acts of intimidation, harassment, or discrimination against employees who participate in labor union activities.
- Promote open and constructive communication between management and employees.
- Provide appropriate channels for employees to express opinions or file complaints.

#### **4.5 Working Hours and Wages**

The company establishes working hours, wages, and benefits in accordance with applicable labor laws. The company has set the following guidelines:

- Normal working hours shall comply with labor law requirements.
- Overtime work must be voluntary and agreed upon by employees.
- Wages, overtime pay, and benefits must be paid accurately and on time.
- The company shall not make unfair wage deductions.
- Employees must receive clear information regarding wages and any deductions.

#### **4.6 Non-Discrimination**

The company is committed to treating all employees equally and fairly, without discrimination in any aspect of employment. The company has established the following guidelines:

- Do not discriminate in recruitment, promotion, compensation, or opportunities for employee development.
- Do not discriminate on the basis of gender, age, race, religion, nationality, disability, marital status, or political opinion.
- Promote an organizational culture that respects diversity and individual differences.
- Create a working environment free from harassment, bullying, and violations of human dignity.
- Provide channels for employees to file complaints, and conduct investigations in cases of discrimination or inappropriate conduct.

#### **4.7 Land Rights**

The company respects the land rights and resources of local communities and will conduct business without violating community rights. The company will take the following actions:

- Strictly comply with laws related to land and the environment.
- Refrain from any activities that involve encroachment or unlawful use of land.
- Listen to the opinions and concerns of affected communities.
- Promote good relationships between the company and local communities.

#### **4.8 Occupational Health and Safety**

The company is committed to creating a safe and hygienic working environment to minimize risks of accidents and work-related illnesses. The company will take the following actions:

- Strictly comply with laws on workplace safety, occupational health, and working environment.
- Conduct regular workplace safety risk assessments.

- Provide employees with appropriate personal protective equipment (PPE).
- Organize safety and accident-prevention training for employees.
- Encourage employee participation in reporting accidents and near-miss incidents.
- Strive to continuously reduce workplace accidents and improve safety standards.

## ❖ Environmental Protection

Sumisho Metal (Thailand) Co., Ltd. recognizes the importance of conducting business responsibly toward society and the environment. The company is committed to protecting the environment and minimizing environmental impacts through the following practices:

### 1. Environmental Management Systems and Policies

The company places great importance on systematic environmental management to prevent and reduce impacts arising from business operations. To achieve this, the company will:

- Comply with all applicable environmental laws and regulations.
- Establish clear environmental policies and organizational objectives.
- Implement environmental management systems such as ISO 14001.
- Continuously monitor and evaluate environmental performance.

### 2. Climate Change Mitigation

The company recognizes the impact of climate change and is committed to reducing greenhouse gas emissions from its business operations. To achieve this, the company will:

- Promote efficient use of energy.
- Reduce unnecessary consumption of natural resources.
- Support renewable energy, alternative energy, and environmentally friendly technologies.
- Monitor and report the company's energy use and greenhouse gas emissions to contribute toward carbon neutrality.

### 3. Materials and Waste Management

The company is committed to managing resources, materials, and waste efficiently to minimize environmental impacts. To achieve this, the company will:

- Reduce resource consumption in production processes.
- Promote efficient use of materials and encourage reuse.
- Implement proper waste segregation systems.
- Dispose of waste in compliance with applicable laws and standards.

### 4. Respect for Animal Welfare

The company values humane treatment of animals and respects natural ecosystems. To achieve this, the company will:

- Not support or engage in acts of animal cruelty.
- Consider the impact of business operations on animals and ecosystems.
- Promote the use of materials and processes that do not harm animals.

#### **5. Continuous Environmental Improvement in Production**

The company is committed to continuously improving its operational processes to reduce environmental impacts and enhance resource efficiency. To achieve this, the company will:

- Promote the development of environmentally friendly technologies.
- Minimize emissions generated during production processes
- Encourage employee participation in environmental conservation, including reducing water and electricity consumption.
- Regularly monitor and review environmental performance.
- Commit to preventing deforestation and protecting biodiversity.
- Manage business activities to minimize risks of soil contamination, in compliance with environmental laws, regulations, and standards.
- Control noise generated from production processes, machinery, equipment, and company activities to remain within legal and regulatory limits.

#### **❖ Maintaining Responsible Business Practices**

Sumisho Metal (Thailand) Co., Ltd. conducts business with integrity, transparency, and responsibility toward all stakeholders. The company is committed to complying with laws, regulations, and international standards relevant to its operations. The following guidelines have been established:

##### **1. Conducting Business without Bribery or Corruption**

The company is committed to operating with transparency, honesty, and social responsibility, and does not tolerate corruption in any form. The guidelines are as follows:

- 1.1 Directors, executives, and employees are strictly prohibited from engaging in corruption in any form, whether direct or indirect. They must exercise caution in activities that may pose corruption risks, such as donations or sponsorships, giving and receiving gifts, entertainment, procurement, and contracting.
- 1.2 Employees must not engage in any actions that could mislead others into believing the company supports or is involved in political activities or parties. Company funds, assets, or resources must not be used to support or distribute to politicians or political parties, nor may company positions or working hours be used to support political activities.
- 1.3 Donations and sponsorships must be carried out transparently, in accordance with company policies and regulations, and in compliance with the law. Measures must be taken to ensure that such contributions are not used for corrupt purposes.

- 1.4 The giving or receiving of gifts or entertainment related to business dealings must be of reasonable value, consistent with customary practices, and strictly in compliance with applicable laws, regulations, and company policies.
- 1.5 Employees must not solicit, accept, or agree to receive assets or benefits that could improperly influence decision-making or lead to unfair conduct in the performance of duties.
- 1.6 All donations, sponsorships, gifts, and entertainment must be properly documented to ensure accountability and auditability.
- 1.7 Employees must not ignore or overlook suspected acts of corruption. Any such incidents must be reported to supervisors or responsible persons, and employees must cooperate fully in fact-finding investigations.

## **2. Privacy and Cybersecurity Practices**

The company places great importance on protecting personal data, customer information, business data, and intellectual property. Data management is carried out in compliance with applicable laws, such as the Personal Data Protection Act, and in accordance with recognized information security standards. The company will take the following actions:

- 2.1 Establish information system controls and cybersecurity measures to prevent unauthorized access, loss, leakage, or misuse of data.
- 2.2 Require all employees to maintain the confidentiality of company, customer, and partner information, and to strictly comply with the company's information security and IT policies.

## **3. Compliance with International Trade Controls**

The company is committed to complying with laws and regulations governing international trade controls related to its products, technologies, and services, including export and import laws as well as economic sanctions imposed by various countries. The company will take the following actions:

- 3.1 Comply with U.S. trade control laws and other international trade regulations relevant to the company's business operations, including requirements established by global customers.
- 3.2 Establish processes to verify business partners, customers, and product destinations to ensure that company operations are not associated with individuals, organizations, or countries subject to sanctions or trade restrictions under applicable laws.

#### 4. Compliance with Customs Regulations

The company will comply with all applicable laws, rules, and requirements related to customs in the import, export, and transportation of goods. The company will take the following actions:

- 4.1 Prepare customs documentation accurately, completely, and transparently, including declarations of product type, product value, country of origin, and other relevant information as required by law.
- 4.2 Employees involved in import and export processes must strictly follow company procedures and regulations to prevent risks of customs law violations and to ensure that the company's operations comply with legal requirements and international standards.

#### ❖ Financial Responsibility and Accurate Recordkeeping

Sumisho Metal (Thailand) Co., Ltd. is committed to conducting business with transparency, integrity, and accountability. The company places great importance on preparing, recording, and reporting financial and business information accurately, completely, and reliably. The following guidelines have been established:

1. All accounting records, financial documentation, and performance reports must comply with applicable accounting standards, laws, regulations, and requirements of regulatory authorities.
2. Employees, executives, and individuals involved in company operations must record financial and business transactions accurately, completely, and in a timely manner. Records must not be falsified, concealed, or misrepresented.
3. The company does not tolerate falsification of documents, inaccurate accounting, or any actions intended to conceal financial facts or evade legal compliance.
4. The company shall establish appropriate internal controls, audits, and oversight mechanisms to ensure that the preparation and retention of financial information is accurate, transparent, and verifiable.
5. Employees involved must comply with company policies and procedures for maintaining financial documents and records, including safeguarding the confidentiality of information related to the company, customers, and business partners.

6. The company promotes an organizational culture of integrity and accountability, and encourages employees to report concerns or behaviors that may involve inaccurate record-keeping through the company's whistleblowing channels in good faith.
7. The company will conduct investigations and take disciplinary measures in accordance with company regulations if violations of financial responsibility and accurate record-keeping policies are found.

#### ❖ **Prevention of Sexual Harassment**

Sumisho Metal (Thailand) Co., Ltd. is committed to ensuring fairness within the company by implementing policies to prevent and address sexual harassment at all levels. The company strives to create and maintain a working environment free from sexual harassment or misconduct by raising awareness, building understanding, and establishing preventive measures and procedures to address issues that may arise.

The company will promptly handle complaints related to sexual harassment or misconduct and will implement workplace arrangements and measures to reduce risks of such incidents. In addition, the company enforces rules and regulations to monitor and control conduct in compliance with applicable laws.

#### ❖ **Duties of Directors, Executives, and Employees**

To uphold the business ethics of Sumisho Metal (Thailand) Co., Ltd., the company has established standards of conduct for directors, executives, and employees. These serve as guidelines for professional behavior, emphasizing integrity, ethics, and honesty.

### **1. Conduct Toward the Organization**

#### **1.1 Safeguarding Company Assets**

Directors, executives, and employees are responsible for protecting and utilizing company assets for the benefit of the organization. Company assets must not be used for personal gain or for the benefit of others.

#### **1.2 Protecting Company Interests**

##### **1.2.1) Confidentiality of Customer and Company Information**

Directors, executives, and employees must not disclose customer or company information without proper authorization, except where disclosure is legally required and approved by authorized company representatives.

##### **1.2.2) Avoiding Competitive Business Activities**

Directors, executives, and employees must not engage in or participate in any business activities that compete with the company's operations.

### **1.3 Conflict of Interest**

The company prohibits directors, executives, and employees from exploiting their positions for personal, family, or close associates' benefit-financial or otherwise-contrary to the company's interests. The following rules apply:

#### **1.3.1) Financial Involvement with Business Partners**

Directors, executives, and employees must not accept money or personal benefits from customers, contractors, suppliers, or any parties conducting business with the company. They must also avoid financial involvement such as joint ventures or trading activities with such parties.

#### **1.3.2) Outside Employment or Business Activities**

- Directors, executives, and employees must devote their full attention to their responsibilities. Any outside employment or business activities must be approved by supervisors and must not interfere with company duties.
- Any personal business activities undertaken by directors, executives, or employees must not interfere with their responsibilities or working hours at the company. They must not conduct business with the company in their personal capacity, through family members, or through any entity in which they have an interest, nor engage in any activities that compete with the company's business. Such activities must be disclosed in accordance with the company's established rules and procedures.
- Directors, executives, and employees are strictly prohibited from engaging in or participating in any business activities that compete with the company's operations, whether the benefit is obtained directly or indirectly.

#### **1.3.3) Use of Company Information and Trading of Company Securities**

- Directors, executives, and employees must not use the company's material, non-public information for personal gain or for the benefit of others, even if the company itself does not suffer any loss. Examples include purchasing land or investing in businesses located near areas where the company plans to invest, in ways that could be perceived as seeking personal advantage.

#### **1.3.4) Receiving or Giving Gifts and Business Entertainment**

- Directors, executives, and employees should avoid giving or receiving gifts in the form of money, property, or any other benefits from business partners or parties related to the company, except during traditional festivals or customary occasions. In such cases, they must comply with the company's regulations on gifts and business entertainment.

- Directors, executives, and employees must not give or accept assets, gifts, or entertainment that could create undue influence or improper motivation in decision-making, leading to unfair or unethical conduct in the performance of duties.

#### **1.4 Preserving the Company's Reputation**

##### **1.4.1) Fairness Toward Business Stakeholders**

Directors, executives, and employees must treat all business stakeholders-including customers, partners, and the general public-fairly, without exploitation. Conduct must be honest, transparent, and equitable at all times.

##### **1.4.2) Compliance with Laws, Rules, and Regulations**

Directors, executives, and employees must act within the framework of applicable laws and regulations, and must not engage in any actions that constitute violations or misconduct.

#### **❖ Conduct and Treatment of Other Employees**

##### **1. Personal Conduct**

- 1.1 Show kindness and cooperation toward colleagues, and perform duties to the best of one's ability.
- 1.2 Exercise the right to express opinions politely and appropriately.
- 1.3 Supervisors must act as role models, earning respect from subordinates through exemplary behavior.
- 1.4 Employees must use courteous language and respectful behavior, refraining from any actions that show disrespect toward supervisors or colleagues.

##### **2. Discipline**

Discipline is a fundamental principle that enables a diverse workforce to collaborate effectively and achieve productive results. It requires employees to consistently behave and comply with rules, regulations, orders, announcements, and established traditions-whether formally documented or not. Discipline must be upheld with a strong sense of responsibility and commitment to proper conduct at all times.

#### **❖ Guidelines When in Doubt or Facing Issues**

This Code of Business Conduct serves as a fundamental guideline that all directors, executives, and employees are required to follow. However, it may not cover every possible situation. If directors or employees encounter questions or practical issues, they should consult their immediate supervisors in accordance with the chain of command. In cases of conflict, the decision of the Managing Director shall be considered final.

#### ❖ Oversight of Compliance Implementation

Sumisho Metal (Thailand) Co., Ltd. assigns responsibility to all directors, executives, and employees to acknowledge, understand, and strictly adhere to the company's business conduct policies and practices. Every level of management must ensure that employees under their supervision are fully informed, understand, and comply with the company's Code of Business Conduct in a serious and consistent manner.

The company does not tolerate any actions that conflict with legal requirements or ethical standards of society. Any director, executive, or employee found to have violated the Code of Business Conduct will be subject to strict disciplinary measures. In cases where misconduct is believed to constitute a violation of laws, rules, or government regulations, the company will immediately refer the matter to the relevant authorities for legal action in accordance with applicable laws and regulations.

#### ❖ Whistleblowing and Reporting Misconduct

The Managing Director of Sumisho Metal (Thailand) Co., Ltd. places great importance on the rights of all stakeholders. The company therefore provides opportunities for employees and stakeholders to report or provide information regarding fraud, bribery, corruption, rights violations, unlawful acts, breaches of company rules, non-compliance with company policies, or violations of the Code of Business Conduct.

Reports may also include misconduct or any actions that could damage the company's reputation or image. Employees and stakeholders can submit complaints, suggestions, or whistleblowing reports through the channels provided by the company. All reports must be made in accordance with the procedures specified in the Compliance Policy (SMTL-COM-01).

#### ❖ Respecting and Protecting Intellectual Property Rights

Sumisho Metal (Thailand) Co., Ltd. recognizes the importance of protecting and safeguarding the intellectual property of the company group from unauthorized use or infringement, while also respecting the intellectual property rights of others. Directors, executives, and employees must comply with all applicable laws and regulations relating to intellectual property, copyrights, patents, trademarks, trade secrets, and computer crime laws. The following guidelines apply:

1. Company intellectual property must not be used for personal benefit or disclosed publicly without authorization. Any reproduction, modification, disclosure, or distribution of copyrighted works, in whole or in part, requires prior approval from the company.
2. Unauthorized use of the company's or others' intellectual property is strictly prohibited. Infringement constitutes a disciplinary offense and may result in criminal prosecution as well as civil liability for damages.
3. Employees must use only licensed products and services and must not support counterfeit goods or activities that infringe intellectual property rights.

4. Upon termination of employment, directors, executives, and employees must return all intellectual property belonging to the company group, including reports, statistics, software, blueprints, trade data, production processes, and related materials.
5. All employees must strictly follow company regulations on computer system usage, including email and internet use, software installation and operation, access control, and data security. These measures ensure efficient use of IT systems and reduce risks of violations under the Computer Crime Act B.E. 2550, which carries criminal penalties.
6. The company maintains robust information security systems to protect confidential and sensitive data from unauthorized access or external threats such as computer viruses. Safeguards include firewalls, anti-virus software installed on all company computers, network zoning, data backup systems, and disaster recovery plans, which are regularly tested and rehearsed.

#### ❖ Use of Computers and Information Technology

1. Computers, information technology, and data used in the course of work are considered company property. Directors, executives, and employees must not use company computers or IT systems for personal benefit.
2. Directors, executives, and employees are prohibited from disclosing company passwords or any protected system credentials used to access company information systems to others or to external parties.
3. Directors, executives, and employees must not disclose any information contained within the company's protected information systems, or any data purchased by the company, without proper authorization.

#### ❖ Protection of Personal Data

Sumisho Metal (Thailand) Co., Ltd. recognizes the importance of safeguarding the personal data of employees, customers, partners, and all stakeholders. The company has established the following guidelines:

##### 1. Compliance with Laws

- The company strictly complies with the Personal Data Protection Act (PDPA) B.E. 2562.
- Personal data is collected, used, and disclosed only for clearly defined purposes and with the consent of the data owner.

##### 2. Data Security

- Technical and administrative measures are implemented to prevent unauthorized access, use, disclosure, or destruction of data.
- Access control systems and data encryption are applied in accordance with international standards.

### **3. Data Disclosure**

- Personal data will not be disclosed to external parties unless consent is obtained from the data owner or disclosure is required by law.
- Business partners or service providers who receive personal data must comply with the same data protection measures as the company.

### **4. Rights of Data Subjects**

- The company respects the rights of data subjects to access, correct, or request deletion of their personal data.
- Convenient and secure channels are provided to enable the exercise of these rights.

### **5. Training and Awareness**

- The company provides training to employees on personal data protection and their responsibilities in maintaining confidentiality.
- An organizational culture that prioritizes data security and privacy is actively promoted.