



Policy No ENV14/2025

## Code of Conduct

Ennovie Co., Ltd. (hereinafter referred to as “Ennovie”) adheres to the guidelines for business operation regarding ethics and responsibility to operate all company businesses. Ennovie operates its business giving precedence to human rights and the environment. Ennovie stipulates all companies or persons doing business with Ennovie (hereinafter referred to as a “Party”) adhere to the guidelines with the same responsibilities and standards.

Pertaining to conditions to conduct business with Ennovie, each Party must adhere to and comply with the following ethics under current laws and regulations.

In the event a Party does not adhere to or comply with said regulations, it shall be deemed as a breach of its agreement. Ennovie may have sole discretion to terminate all agreements with the Party and cancel all available purchase orders without any compensation to the Party. In this case, the Party shall grant Ennovie the power to assign an agent to proceed with an inspection of its organization to confirm adherence to said ethics.

The Party must notify and explain the details of these ethics to its staff by using comprehensible language as well as be responsible for inspections to make sure that all sub-contractors related to any business with Ennovie follow said ethics and ratify or agree in writing.

### **Ennovie’s Code of Conduct Standards:**

Compliance with all laws and regulations: The Party must comply with all laws and regulations, including codes, disciplines, rules in the region and the country, treaties and applicable industry standards as well as apply publicly announced policies endorsed by senior executives to achieve these ethics.

Child Labor: The Party must prevent hiring child labor under all domestically applicable laws, treaties, guidelines of the United Nations (UN), and the International Labor Organization (ILO). The Party acknowledges that it must protect child rights from economic exploitation and any operations of work that

may be dangerous or disturb the right to study of children or is dangerous to the health or body, mind, soul, morals, or social development.

To comply with the purpose of these ethics, "child" means a person who is less than fifteen (15) years old. If the local rule regarding minimum age does not stipulate an age more than this to work or enroll in compulsory education, the rule that stipulates a higher age must be applied in this case<sup>1</sup>. However, Ennovie does not hire any person who is under eighteen (18) years and suggests the Party follow this criterion as well.

The company has a standard to remedy a case in which a person who is less than 18 years working in the company. The stipulated standard is that the staff shall stop working immediately, bring the child from the manufacturing area to a safe place, contact the parents and explain the child policy of the company to be acknowledged. Severance pays will be given according to the law, and such a child will be encouraged to enroll in compulsory education. When such a person is no longer a child and is older than 18 years, he/she can be recruited.

The Party must have efficient mechanisms to confirm the age of a person before recruitment. Also, the Party must make sure that the wages are fair and provide a break to such staff during the night for at least 12 hours, at least two (2) days off per week, and no overtime work.

Forced Labor: The party acknowledges that forced labor or reluctant labor by staff is not allowed. Further, limiting the freedom to move and travel is not allowed. The staff must be treated with dignity and respect by the Party. In addition, there must not be any physical punishment, threatening violence or physical abuse, sexual abuse, mental abuse, or verbal abuse in other forms to staff. During the process of lodging complaints and investigations, this must be explained to all staff clearly and thoroughly.

Safety and Occupational Health: Working environments must comply with the laws and applicable industry standards to assure safe work conditions. The Party must arrange working conditions in accordance with the best occupational health and safety that can be provided to staff. Moreover, the

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<sup>1</sup> According to the ratification of ILO no. C138 – Minimum Age Convention 1973 (No.138), the stipulated minimum age to work in mainland China is 16 years, in Indonesia is 15 years, and in Thailand is 15 years.

Party must ensure that safety and hygienic conditions are sufficient in the workplace. There must be training for staff regarding safety standards and occupational health as appropriate. The Party must provide appropriate steps, including installing alarms, stipulating provisions to deal with emergencies, and an evacuation plan to prevent accidents, providing access to health care facilities and infirmaries in the working area, and investigating formal documents when any severe accidents occur.

Gender and Race Equality: The Party acknowledges the importance of gender and race equality. Therefore, Ennovie stipulates the Party accept gender and race equality relating to practices and local traditions, especially the right of men and women from every race to get paid equally for equal work, get the opportunity to be hired equally (including conditions to pay wages), and get occupational development equally (including an opportunity to promote). The Party pledges to promote said rights.

The Party must not discriminate in any form of employment or working condition in its employment.

Working Conditions and Wages: The Party must pay remuneration to staff for finished work or work that must be done in the form of wages (wage payment is in accordance with normal criteria, as agreed before transferring to a bank account, in cash, or by check at the convenience of the staff). This includes overtime pay at a higher rate, maximum working hours, work ratio and other compensation to pay wages. According to the minimum standard, wages must not be less than the rate stipulated by the laws of the country or current industry standard. In case the laws or industry standards provide better conditions for staff, wages must be sufficient for living.

Therefore, the Party must stipulate the conditions for work and the wages for staff, including appropriate and legitimate working hours per day and per week (must not be more than eight hours per day and forty-eight hours per week<sup>2</sup>). There is an exception in accordance with ILO treaty No.1, concerning paid annual leave and weekends, which is one of the staff's rights.

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<sup>2</sup> In mainland China, work is 8 hours per day and 44 hours per week. In India, it is 9 hours per day and 48 hours per week. In Indonesia, it is 7 hours per day and 40 hours per week. In Thailand, it is 8 hours per day and 48 hours per week.

Right of the Staff to Information and Consulting: The Party acknowledges and agrees that staff or representatives of staff will stay informed as well as get appropriate and prompt consultation under the conditions stipulated by laws and domestic practices.

The Party must ensure that staff or representatives of staff have an opportunity to stay informed about the financial trends of the company frequently and completely. In case there is any significant impact on staff benefits, including the general provisions of employment, there must be provision of said information and a consulting committee as soon as possible to make sure that the suggestions and perspectives of the staff are involved in the decision process by executives.

Staff of the Party must have the opportunity to attend relevant training to support staff to improve the work under their responsibility.

Right to Mutual Negotiation: The Party acknowledges the right of the staff to associate, group up, and mutually negotiate peacefully and legally to protect their benefits without any punishment or interference (as stipulated in section 23 of Universal Declaration of Human Rights and ILO treaty No. 87 and 98). The Party must not hinder mutual negotiation and adhere to the agreement of mutual negotiation in case there is an agreement.

Compliance with Rules pertaining to the Environment: The Party must comply with all laws and regulations pertaining to the environment and apply an appropriate management system and operation to minimize environmental impact. The Party must eliminate chemical waste in accordance with applicable laws and proceed with steps to minimize the amount of garbage/ pollution that occurs as well as the number of energy/ natural resources used. Moreover, the Party must check to ensure the efficiency of business from the perspective of using natural resources, including but not limited to water and energy. The Party must avoid the production, sale, or use of chemical substances and dangerous substances as well as choose alternatives to dangerous chemical substances if possible.

Bribery and Payment for Convenience: The Party must resist all kinds of bribery, consider the risk of bribery, and have appropriate measures to monitor such risk. The Party must facilitate reporting the possibility of bribery, enforce the punishment in case there is a bribe/ attempted bribe, and proceed with

appropriate measures to monitor all payments for convenience, without punishing the person who reports or refuses to be bribed in all cases.

Money Laundering and Funding Terrorism: The Party must keep financial statements, which are audited and verified by all organizations doing business with the Party. International transactions may be subject to more than one regulation.

Diamonds and Gems: The Party must agree to support a voluntary self-care plan for the diamond and gem industry. The Party must not buy or sell conflict diamonds that are already known from Kimberly certification process.<sup>3</sup> The Party must comply with and keep records of all Kimberly certificates, which are evaluated and corresponded. The Party must comply with the resolution of the World Diamond Council pertaining to self-care by keeping all invoices (which must contain guarantees from the World Diamond Council<sup>4</sup>) and have a system to prevent the buying and selling of illegal diamonds. Staffers must acknowledge the restrictions concerning the sale and purchase of diamonds.

Conflict Mineral<sup>5</sup>: The Party must have a policy to certify the gold material in any product to ensure that it does not financially support or provide benefits, directly or indirectly, to any armed group who seriously infringes on human rights. The Party must confirm the source and do so in good faith, which includes inspecting the status of the source and the possessor's cycle of evidence for such gold, as well as administer status inspection measures as requested.

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<sup>3</sup> Kimberly Certificate is a joint operation between governments, international sellers in the diamond industry, and civil society to suppress the circulation of conflict diamonds. To achieve the purpose of Kimberly Certificate, conflict diamond means any diamond that is not cut, which rebels often use to finance and support wars against legitimate governments.

<sup>4</sup> In other words, "a diamond, which is required to pay, is purchased from a legitimate source, which does not involve financially supporting action causing conflict and is in accordance with resolution of the United Nations. The seller guarantees that such diamonds do not have conflict referring to personal information and/or written certification from the diamond provider".

<sup>5</sup> As defined by the laws of the US in BE2553, The Dodd Frank Wall Street Reform and Consumer Protection Act section 1502(e)(4): Conflict Mineral – the term "Conflict Mineral" means:

1 – Columbite-tantalite (Coltan), cassiterite, gold, wolframite, or any of their derivatives, or

2 – any other mineral or derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or adjoining countries.

(Access at <http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>)

Security of the Products: The Party must have security measures in place for the products indoors and during delivery, including the hiring of armed security guards if necessary. Concurrently, the Party must primarily give precedence to the security of staff, visitors, and business partners.

Integrity of Products: The Party must comply with all relevant standards and laws. In addition, it must correctly disclose all physical characteristics of the product and must not provide false statements or omit any substantial action. The Party must disclose the purity of gold, use signs to show the quality of permitted gold, and disclose information about the quality of diamonds, gems, and other semi-precious stones, including disclosure of information for diamonds in terms of quality improvement, laboratory-grown diamonds, and imitation diamonds.

Harassment, discipline, grievance procedures and non-retaliation: The party will not use anything of violence and harassment in the workplace. Employees must not be harassed or subjected to violence against themselves, their families, or their colleagues. The party must have a clear grievance and investigation process. Confidential and impartial for this process will communicate and apply to all employees. Employees are free to file a grievance without any penalty or retaliation by using the company complaint box and record employee grievances.

Ennovie shall adjust its ethics to be always updated, and the Party must agree to said adjusted information if there is no change in a substantial clause that affects the Party.



-Signature-

(Miss. Saichol Puengyaem)

Director of the Company

17/01/2025