

CODE OF CONDUCT FOR BUSINESS PARTNER

We, **Minor International PCL** (hereinafter called “MINT”), are committed and continually strive to develop, strengthen and promote high standards of integrity and ethical business practices in conducting our businesses and in dealing with business partners. To ensure that our relationships with business partners meet and support these expectations, MINT has established this Code of Conduct for Business partners (hereinafter called “Code”) that outlines the minimum standards and requirements expected from all business partners (as well as the business partners’ subsidiaries, affiliated companies, subcontractors or sources in the supply chain) to adopt and adhere to when doing business with MINT.

By implementing this Code, MINT strives to minimize the level of business risk within the supply chain, build closer relationships with our business partners and safeguard future supply. MINT values honest and open communication with business partners and believes that transparency is vital to a successful business relationship. In the event of non-compliance, we require our business partners to be committed and engaged in remedying the non-compliance issues within the time schedule set out in the corrective action plan. MINT seeks to continuously improve together with our business partners and help them achieve compliance with the provisions of this Code, while reserving the right to terminate any agreements should a business partner decide that compliance with the requirements of the Code is impossible to obtain or in the event of non-compliance of this Code by the business partner.

COMPLIANCE WITH LAW

Business partners must, in addition to meeting the provisions of this Code, comply with all applicable laws and regulations wherever it conducts its business. These include, among others, laws and regulations related to corporate governance, competition, product safety and product liability, occupational health and safety, labor, environment, protection of intellectual property, protection of individual privacy and equality at work.

STANDARDS AND REQUIREMENTS

A. ETHICS

- 1) **Anti-Corruption**
MINT is committed to conducting its business free from extortion, bribery and all unlawful, unethical or fraudulent activity. MINT partners must not offer, give, promise or authorize any bribe, gift, loan, fee, reward or other advantage to any government official or employee, any customer, any MINT employee or any other person to obtain any business advantage or improperly influence any action or decision. MINT business partners must comply with all applicable laws and regulations.
- 2) **Conflicts of Interest**
MINT business partners must avoid any situation or relationship that may involve an inappropriate conflict or the appearance of a conflict with the interests of MINT. MINT business partners shall not offer or provide excessive gifts, hospitality or entertainment to any MINT employee or family member of MINT employees. MINT employees and their family members may not hold any significant economic interest in any entity that does business with MINT and MINT business partners are required to avoid such relationship with MINT employees.
- 3) **Insider Trading**
MINT business partners must ensure that non-public information obtained in the course their relationship with MINT is not used for the personal benefit of the MINT business partner, their employee or other persons.
- 4) **Intellectual Property**
MINT business partners must use MINT's trade information, copyrights, and trademarks only in a manner that is permitted under their contracts with MINT and may not misappropriate or infringe upon the trade information, trademarks, or copyrighted works of others. MINT business partners must not misuse trade secrets or proprietary or confidential information of others for their own purposes or disclose such information to unauthorized third parties. MINT business partners must notify MINT of any unauthorized use of MINT trade secrets, brands, trademarks, logos or confidential information by a third party.
- 5) **Confidentiality**
MINT business partners must protect MINT's information, not disclose it to any unauthorized third party, and use it only for the business of MINT.
- 6) **Fair Competition**
MINT business partners shall not:
 - Propose or enter into any agreement with any competitor to fix prices, margins, or terms and conditions or to divide up any markets or customers, or
 - Propose or enter into any agreement or understanding restricting resale pricing of MINT products
- 7) **Honest and Accurate Dealings**
MINT business partners shall not make any false representations in connection with any MINT transaction including, but not limited to, oral misrepresentations of facts, the promotion or utilization of false documentation such as non-genuine customer purchase orders, fraudulent or forged contracts, forged letters of destruction and/or other false or inaccurate records.

B. LABOR PRACTICE

1) Child Labor/ Underage Labor

Business partners shall ensure that no underage labor has been used in the production or distribution of their goods or services. A child is any person under the minimum employment age according to the laws of the facility's country or in the absence of law. Business partner's shall not employ anyone younger than 15 regardless of the country's minimum working age. Business partner shall ensure that employee with the age younger than 18 years old shall not work in dangerous working area, and working time shall not be over than 8 hours a day and shall not work at night shift (10.00 pm -6.00 am).

2) Female labor

Business partner shall ensure that female and pregnant employees shall not work in dangerous working area. Pregnant employee shall not work over than 8 hours/day and shall not work in night shift (10.00 pm -6.00 am). Business partner shall not lay-off, demote or reduce benefits as a result of pregnancy.

3) Freedom of Association and Collective Bargaining

Business partners must recognize and respect the rights of employees to freedom of association and collective bargaining with the permit of law.

4) Forced and Compulsory Labor

Business partners will not use forced, prison or indentured labor. Business partners will ensure that terms of employment are voluntary. Business partners will not require any employee to remain in employment for any period of time against his or her will, or adopt practices that restrict employee's ability to terminate employment.

Business partner shall not take possession of money or legal/ regulatory document (e.g. identity card, passport or work permit) for working assurance.

5) Employment Status

Business partners shall employ workers who are legally authorized to work in their location and facility and are responsible for validating employee's eligibility to work status through appropriate document.

6) Working Hours and Rest Days

Employees shall be allowed at least one day off every seven days, not more than 8 hours per day, not more than 48 hours a week and any overtime worker shall be voluntary.

7) Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. The information related to remuneration, benefit and welfare shall be informed to every employee in written documents and made in the language understood by every employee.

8) Non-Discrimination

Business partners will not discriminate in hiring and employment practices, including salary, benefits, advancement, discipline, termination or retirement, on the basis of race, religion, age, nationality, social or

ethnic origin, sexual orientation, gender, pregnancy, marital status, political opinion, disability, membership of employee's association or any other category protected by law.

9) Disciplinary Practices

Business partner shall not engage in or tolerate the use of corporal punishment, mental or physical coercion, or verbal abuse of employee. Business partner shall not lessen wage as a result of disciplinary measure.

C. HEALTH & SAFETY AND ENVIRONMENTAL

1) Health and Safety

Business partners shall provide their employees with safe and healthy working and, where provided, living conditions. At a minimum, potable drinking water, adequate, clean restrooms, adequate ventilation, fire exits and essential safety equipment, an emergency aid kit, access to emergency medical care, hygienic dining area and appropriately-lit work stations must be provided. In addition, facilities be constructed and maintained in accordance with the standards set by applicable laws and regulations.

Employee shall participate with safety and healthy working environment. Safety training program shall be provided to concerned employee. Appropriate personal protection gear shall be provided.

2) Environmental Permits, Regulations and Standards

All required environmental permits and registrations shall be obtained, maintained and kept current. Business partner shall ensure that applicable regulatory/ legal requirements and other concerned requirements are taken into account in establishing, implementing and maintaining its environmental management system.

Chemicals and other materials posing a hazard if released to the environment shall be identified and managed in accordance with applicable laws and standards.

3) Pollution Prevention and Resource Reduction

Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials. Waste water shall be treated to eliminate the contaminant and achieve regulatory requirement before released to environment. Toxic waste shall be collected and discarded following law and regulation. Air pollution shall have appropriate treat method and managed contaminant residue in accordance with applicable law/ regulatory standards before released to environment.