

Supply Chain Management

Embedding Sustainability Across the Supply Chain through responsible sourcing, supplier engagement, and risk-based governance, GULF promotes transparency, resilience, and continuous improvement across its supply chain while supporting sustainable business growth.

2025

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Supplier Code of Conduct



Detail of Supplier Code of Conduct

Aspects	Detail of Supplier Code of Conduct
Forced Labor Prohibition	Strict zero tolerance for forced labor, slave labor, or human trafficking across all supplier operations and their upstream supply chains.
Child Labor Safeguards	Absolute prohibition of child labor across all levels of the supplier's operations and upstream supply chain.
Decent Working Conditions	Mandatory compliance with legal hours, wages, benefits, and holidays, explicitly requiring that worker living conditions reflect a decent standard.
Occupational Health & Safety (OHS)	Requires safe and healthy work environments in compliance with OHS standards, backed by robust safety management systems, OHS awareness, and executive oversight.
Discrimination & Harassment	Enforces a workplace free from discrimination, intimidation, bullying, and both sexual and non-sexual harassment.
Freedom of Association & Collective Bargaining	Guarantees worker rights to establish or join independent trade unions and participate in collective bargaining without fear of retaliation.
GHG Emissions & Energy Consumption	Mandates that suppliers implement processes to systematically reduce energy consumption and greenhouse gas (GHG) emissions across all scopes.

Supplier Code of Conduct



Detail of Supplier Code of Conduct

Aspects	Detail of Supplier Code of Conduct
Waste Management & Pollution Prevention	Requires active systems to prevent air, water, and soil pollution, alongside waste management mechanisms aligned with the circular waste hierarchy.
Resource & Eco-Efficiency	Requires suppliers to reduce the consumption of natural resources (water, fuel, land, mined materials) to optimize eco-efficiency and promote circularity.
Biodiversity & Deforestation Protection	Strictly prohibits operations from harming high-biodiversity areas or endangered species, while enforcing a zero-deforestation mandate.
Anti-Corruption & Conflict of Interest	Direct ban on all corruption, extortion, and bribery; mandates immediate disclosure of any personal or organizational conflicts of interest.
Anti-Competitive Practices Prevention	Mandates strict compliance with antitrust laws, prohibiting collusive bidding, price-fixing, or predatory pricing.
Grievance Mechanisms & Non-Retaliation	Enforces localized supplier-level grievance mechanisms, ensuring workers can report Supplier Code of Conduct breaches safely without any fear of retaliation.

Supply Chain Management Oversight

GULF's Sustainability Framework and **ESG Supply Chain Management System resides with the Board of Directors**, which is actively supported by the Sustainability, Governance and Risk Management Committee (SGRC). **The SGRC, appointed by the Board, is a board-level committee responsible for reviewing and approving sustainability-related policies, managing environmental and social risks, and overseeing group-wide compliance.**

At the operational level, ESG-related Supply Chain Management Program and its execution is strategically led by executive management and overseen directly by GULF's Head of Procurement. Operational results, due diligence findings, and progress of the ESG-related Supply Chain Management Program are systematically monitored by the Sustainability Department and regularly reported and proposed to executive management and the SGRC to drive organizational accountability and continuous improvement.

Alignment and Review of Purchasing Practices

GULF has integrated rigorous safeguards to **align its buying practices with the GULF Supplier Code of Conduct. Specifically, GULF's Anti-Bribery and Corruption Policy mandates that all procurement processes remain transparent and auditable.** This transparency enables regular internal reviews, ensuring that purchasing targets, schedules, and commercial costs do not conflict with ESG requirements or cause suppliers to compromise on labor, ethical, or environmental standards.

Supplier Exclusion for Failure to Meet Minimum ESG Requirements

GULF applies **minimum legal, technical, and ESG requirements** throughout supplier onboarding and ongoing monitoring. **New suppliers that fail to meet these minimum requirements are excluded from tender participation and contract selection**, while qualified suppliers are admitted to GULF's **Approved Vendor List (AVL)**.

Existing suppliers are evaluated annually through a **40-question ESG Self-Assessment Questionnaire (SAQ)**, scored out of 25 points, using a traffic-light rating:

- **Green (15.50–25.00 points) – Pass:** Eligible for standard procurement and contract renewal.
- **Amber (7.50–15.49 points) – Monitor:** Conditional approval and monitoring; an ESG **Corrective Action Plan (CAP)** may be required.
- **Red (0.00–7.49 points) – Warning/Fail:** Requires corrective action and improvement to at least **Amber** in the next annual assessment to remain on the AVL.

Suppliers failing to meet minimum ESG requirements are subject to **enhanced due diligence**, including document reviews and onsite audits. Where gaps are identified, GULF works with suppliers to establish **CAPs addressing root causes, measurable corrective actions, and defined timelines**, with progress monitored through closure.

Where suppliers fail to demonstrate improvement, refuse corrective actions, or have **severe or unmitigated ESG violations**, GULF may escalate the case for **management-level reconsideration of contractual agreements**, including **contract suspension or termination, exclusion from future bidding, and removal from the AVL**.

Supplier ESG Programs

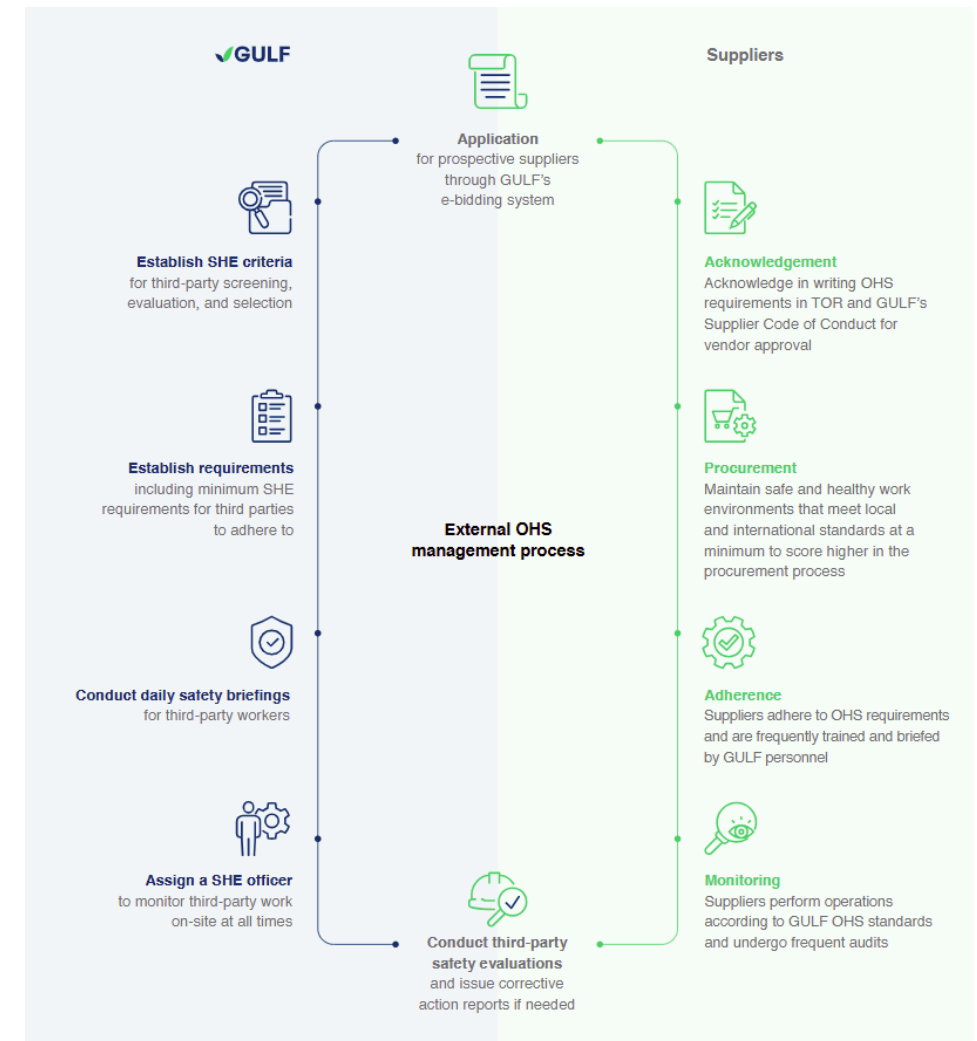


Preference of Suppliers with Better ESG Performance

To advance **sustainable supply chain management** and operational practices, GULF requires all suppliers to formally **acknowledge the GULF Supplier Code of Conduct in writing** as a prerequisite for conducting business with the Company.

GULF applies **ESG performance premiums in its bidding evaluation models** as an incentive mechanism to encourage suppliers and contractors to strengthen their ESG practices. Suppliers and contractors demonstrating **stronger ESG performance**, including higher Safety, Health and Environment (SHE) performance, receive higher evaluation scores and preferential consideration in supplier selection and contract awards.

In addition, suppliers demonstrating **consistently strong ESG performance** may be prioritized for long-term business relationships, higher-value contracts, and increased business opportunities.



Supplier ESG Programs



Training for the Company's Procurement Team on the Supplier ESG Program

GULF implements a green procurement policy under its Environmental and Social Management System (ESMS) to promote environmentally responsible procurement practices. To ensure that procurement decisions support the Company's sustainability objectives, GULF provides **structured training for Procurement team** on their roles and responsibilities in the **supplier ESG management program**. The ESMS explicitly assigns Procurement responsibility for implementing environmental and social screening, monitoring, and evaluation processes for suppliers and contractors.

The training covers **identification of supply chain ESG risks, integration of ESG criteria into supplier screening and selection, supplier due diligence, and responsible sourcing and compliance requirements**. Supplier evaluation considers **technical, commercial, and ESG criteria, including pricing and ESG performance**, supporting informed supplier selection and procurement decisions.

Through this training, Procurement personnel are equipped to integrate ESG considerations alongside price, quality, technical requirements, and other procurement criteria, supporting the effective implementation of GULF's **ESG Supply Chain Management Program**.



Supplier ESG Programs



Training for the Company's Procurement Team on the Supplier ESG Program

GULF strengthens the ESG capabilities of its Procurement team through dedicated Sustainable Supply Chain Management (SSCM) training conducted by an external consultant specialized in Supply Chain management, providing practical knowledge to integrate ESG considerations into procurement and supplier management.

The training covers the Sustainable Supply Chain Management Framework, relevant sustainability requirements and assessment frameworks, Supplier ESG Program, and ISO 20400 Sustainable Procurement, with reference to the UN Global Compact and Stock Exchange of Thailand (SET) guidance.

Through this training, Procurement personnel are equipped to identify supply chain ESG risks, integrate ESG considerations into supplier screening and selection, and implement responsible and sustainable procurement practices, supporting the effective implementation of GULF's ESG Supply Chain Management Program.



International Trade

1 Sustainable Supply Chain Management (SSCM) / Procurement

- Sustainable Supply Chain Management Framework ตาม UN Global Compact และ ตลาดหลักทรัพย์แห่งประเทศไทย (SET)
- ข้อกำหนดที่เกี่ยวข้อง ได้แก่ GRI (Global Reporting Initiative) และ DJSI (Dow Jones Sustainability Indexes)
- การดำเนินงาน (Implement) Sustainable Supply Chain Management แบบสาขา
- Supplier ESG Program ตามหลักของ DJSI
- ข้อเสนอแนะ ISO20400: Sustainable Procurement



2 Incoterms 2020, International Trade Regulation, Free Trade Agreement

- การใช้ Incoterms ทั้ง 11 terms
- Case Study เพื่อให้เข้าใจและตระหนักถึงเรื่อง การโอนความเสี่ยง (Risk Transfer)
- สิทธิประโยชน์ของ FTA (Free Trade Agreement)
- พิธีการศุลกากร (Customs Formality) พิธีการนำเข้า (นำเข้า)
- ข้อควรระวังเกี่ยวกับค่าใช้จ่ายในกระบวนการพิธีการศุลกากร เช่น ค่าปรับ

3 Digital Supply Chain & Supply Chain Resilience

- LEAN Procurement และ DMAIC
- RPA (Robotic Process Automation) กับงาน Procurement
- Supply Chain Resilience Framework
- การ Resilience โดย Agile Supply Chain Strategy
- Show case: Transforming strategy into action (Resilience)



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Systematic Process to Identify Significant Suppliers

GULF systematically **identifies significant suppliers** through its supplier screening process, **considering ESG risks and business relevance** (see Supplier Management Process, pg. 11 -14).

Significant suppliers are those with **significant business relevance and/or high ESG risk, considering their impact on operations or competitive advantage, spending or supply volume, substitutability, ESG assessment results, including suppliers that fail or require mitigation actions to pass, potential adverse ESG impacts, and past or alleged ESG incidents.**

The screening covers 100% of all Tier-1 suppliers and considers country-specific, sector-specific, and commodity-specific risks.

- **Country-specific risk:** Geopolitical and regional supply disruptions, particularly for LNG and fuel imports, are mitigated through diversified sourcing worldwide.
- **Sector-specific risk:** Manufacturing suppliers are screened for energy consumption, GHG emissions, hazardous chemicals, waste, and Occupational Health & Safety risks.
- **Commodity-specific risk:** Natural gas, diesel, biomass, solar PV modules, BESS, and wind turbines are screened for methane emissions, spills, mining impacts, chemical and water use, deforestation, land-use change, biodiversity impacts, and end-of-life waste.

Supplier Management Process



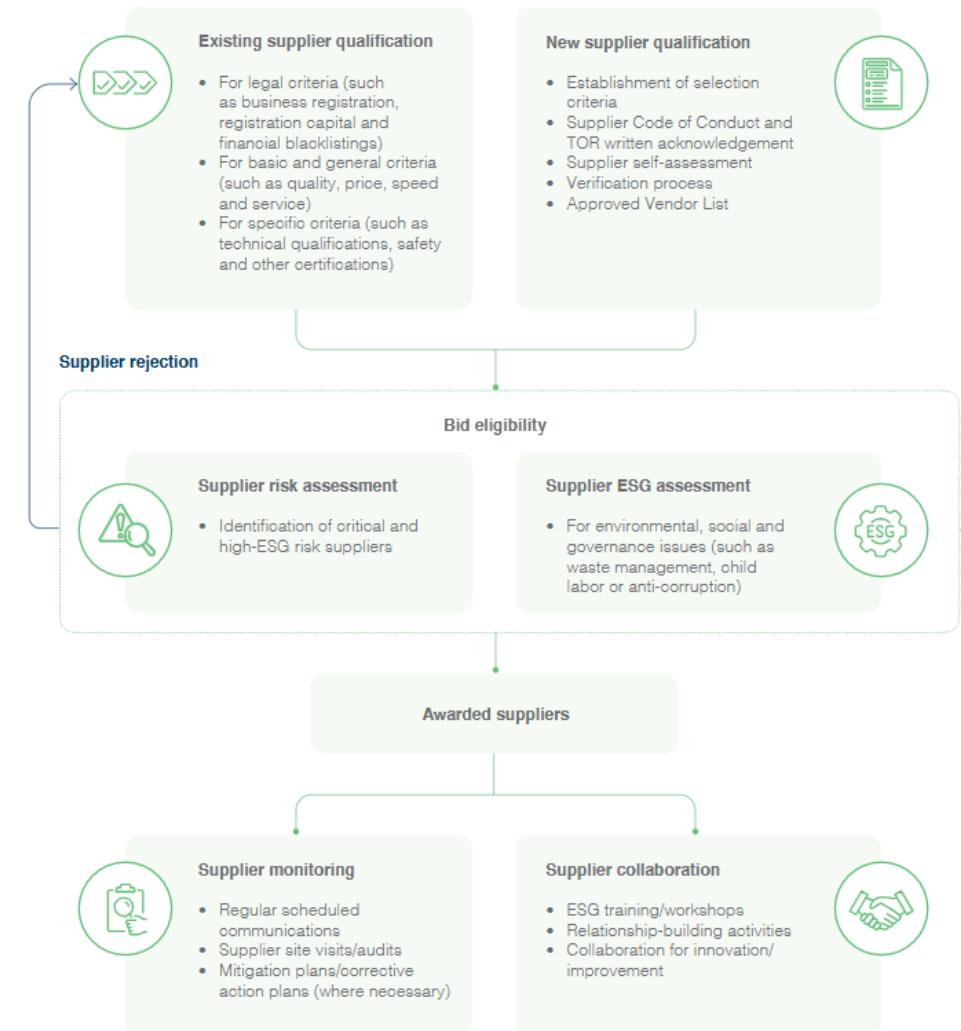
Supplier Management Process

The **Supplier Management Process** is an end-to-end framework for systematically managing supplier ESG risks and business relevance, covering supplier screening and qualification, ESG assessment, monitoring, corrective actions, supplier development, and collaboration.

1. Supplier Screening and Qualification

- **New Supplier Qualification:** New suppliers undergo a **pre-qualification and verification process** before admission to GULF's **Approved Vendor List (AVL)**. The process includes defined selection criteria, written acknowledgement of GULF's **Supplier Code of Conduct and Terms of Reference (TOR)**, supplier self-assessment, and verification.
- **Existing Supplier Qualification:** Current and prospective bidders are continuously screened against three core categories:
 - **Legal Criteria:** Business registration, registered capital, and financial blacklisting checks.
 - **Basic & General Criteria:** Quality, price, speed, and service levels.
 - **Specific Criteria:** Technical qualifications, safety protocols, and relevant certifications.
- **Initial Screening and Bid Eligibility:** Initial screening and verification based on **legal, technical, and ESG criteria** are conducted by Procurement through GULF's **e-bidding system**. Suppliers that fail to meet the minimum requirements and ESG criteria are **excluded from tender participation and contract selection**. Only suppliers that pass the initial screening are admitted to the AVL and become eligible to bid.

Supplier management process diagram



Supplier Management Process

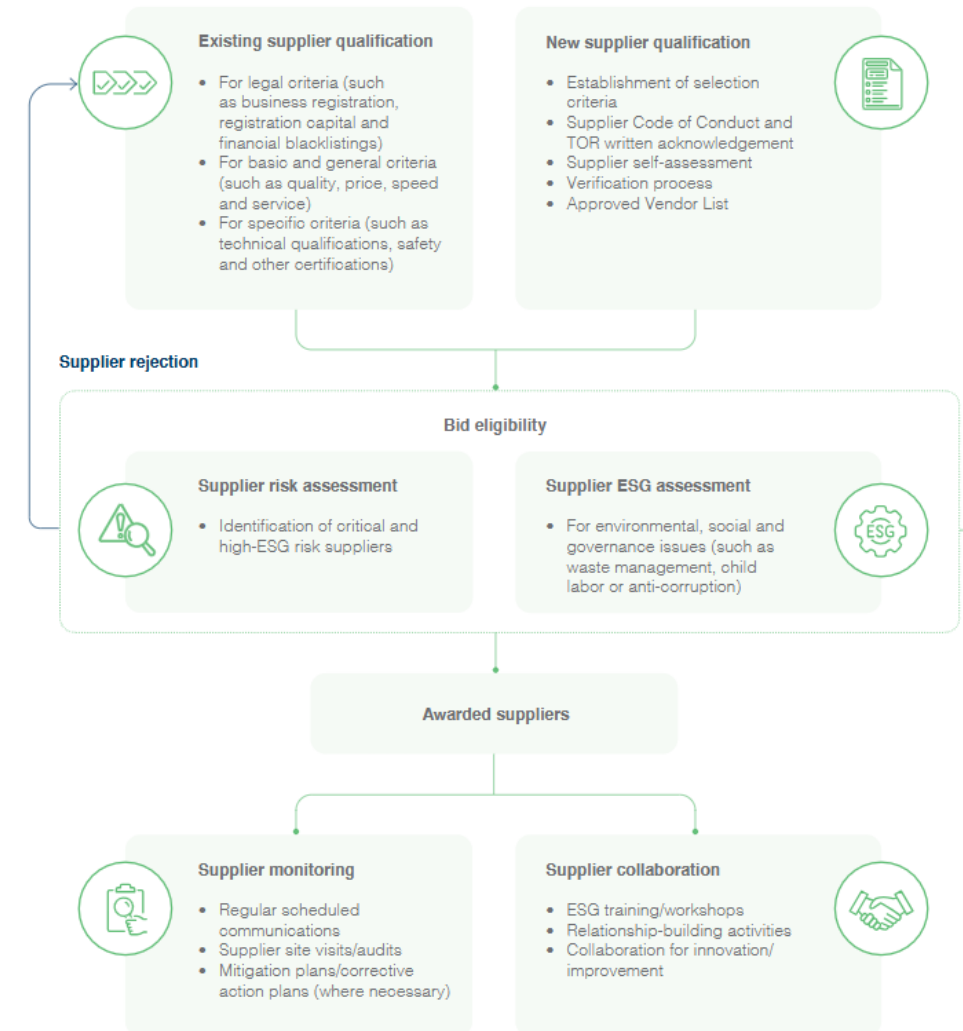


2. Supplier ESG Assessment and Identification of Significant Suppliers

Following qualification, GULF systematically evaluates **supplier ESG risks and business relevance** to identify **significant suppliers** requiring prioritized assessment, monitoring and development.

- **Supplier ESG Assessment:** Suppliers are assessed annually through a **40-question Self-Assessment Questionnaire (SAQ)** covering environmental, social, and governance criteria, including waste management, labor and human rights, Occupational Health & Safety, and anti-corruption.
- **Identification of Significant Suppliers:** Assessment results, together with **business relevance and ESG risk factors**, are used to identify **significant suppliers**, including suppliers with significant business relevance and/or high ESG risk. Screening considers **country-specific, sector-specific, and commodity-specific risks**, as applicable.
- **Supplier Qualification and Exclusion:** GULF manages supplier qualification through its **e-bidding platform**. Suppliers that do not meet minimum **legal, technical, or ESG requirements** are excluded from tender participation, while qualified suppliers are eligible to proceed through the bidding and contract award process.

Supplier management process diagram



Supplier Management Process

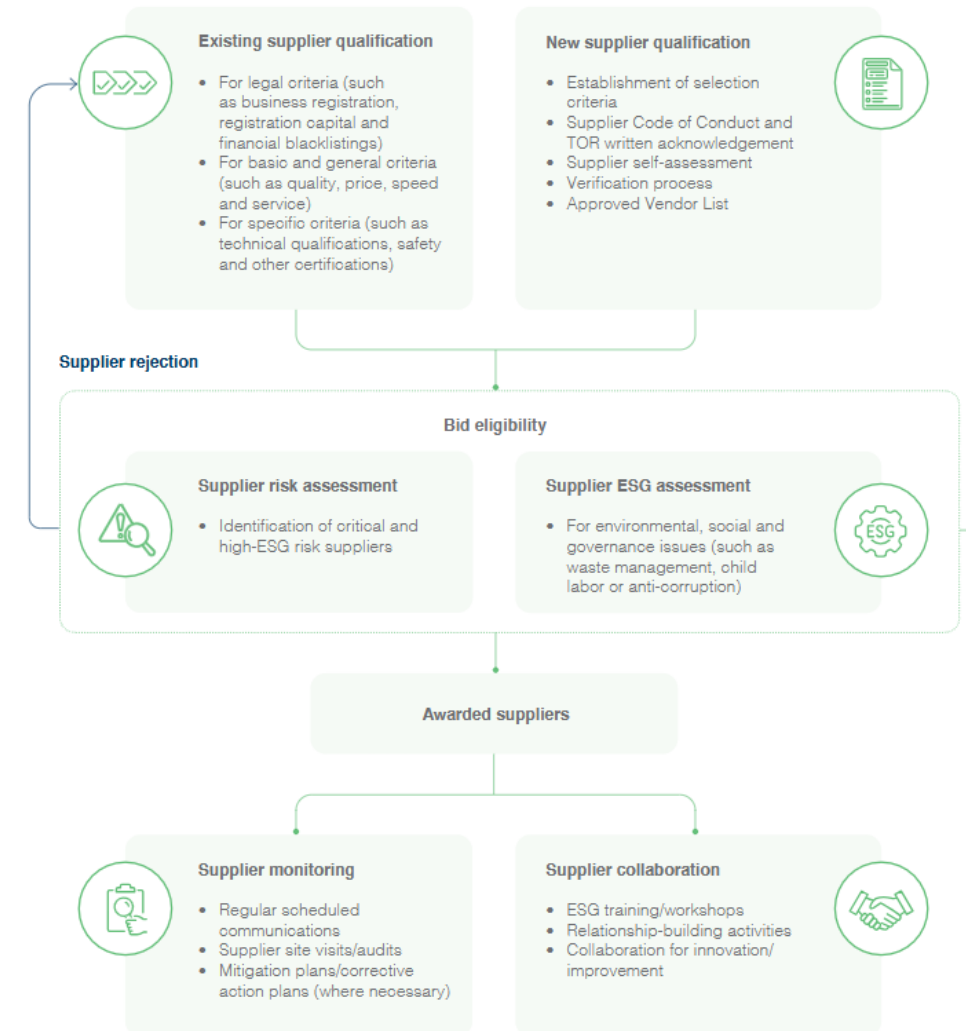


3. Supplier Monitoring and Corrective Action

GULF applies risk-based supplier monitoring and in-depth ESG assessment to verify supplier performance and address identified ESG gaps or non-compliance.

- **Desk and On-Site Assessments:** Suppliers, particularly those identified with elevated ESG risks, are subject to **desktop-based due diligence and on-site assessments** at operating or manufacturing locations to monitor, inspect, and verify compliance.
- **Corrective Action Plans (CAPs):** Where gaps or non-compliance are identified, GULF's procurement and sustainability teams collaborate with the suppliers to draft a context-specific Corrective Action Plan, conducting root-cause analyses and setting a strict improvement timeline, with implementation monitored accordingly.

Supplier management process diagram



Supplier Management Process

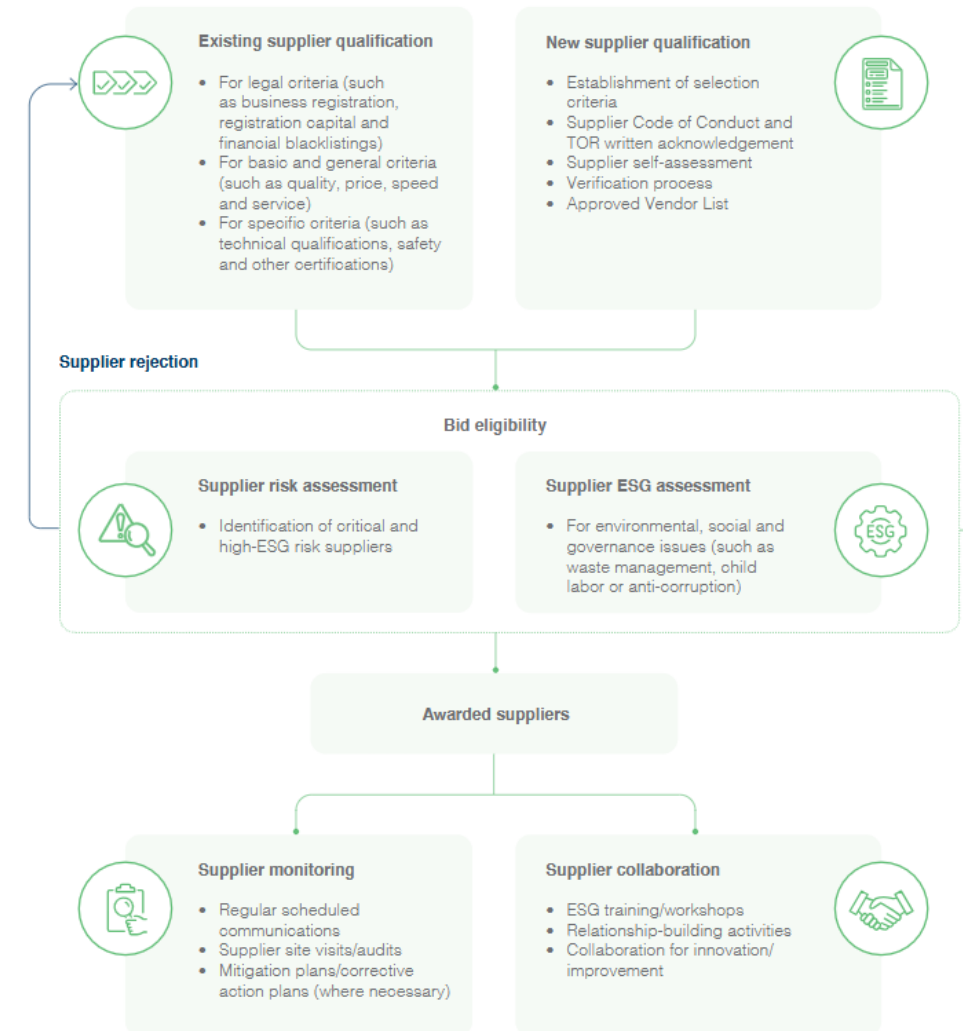


4. Supplier Collaboration & Mutual Growth

Following assessment and monitoring, GULF promotes continuous improvement through **supplier development measures**, ESG capacity building, engagement and collaboration.

- **ESG Training and Capacity Building:** GULF conducts **annual ESG training and workshops** to strengthen suppliers' ESG awareness, capabilities, and alignment with GULF's sustainability requirements. The FY 2025 report records **all 24 significant Tier-1** participated in ESG training and technical workshops.
- **Supplier Collaboration:** GULF conducts **relationship-building activities and collaboration for innovation and improvement** to support responsible and long-term supplier partnerships (such as sourcing high-efficiency solar PV and battery components, please see GULF Sustainability Report 2025, page 145).

Supplier management process diagram



Supplier Assessment Criteria

GULF implements a structured **Supplier Assessment and Development Program** to systematically evaluate supplier ESG performance, identify ESG risks and impacts, verify compliance, implement corrective actions, and support continuous improvement across its supply chain. GULF conducts annual **Supplier ESG Assessments** through a structured **40-question Self-Assessment Questionnaire (SAQ)** totaling 25 points. Assessment results are categorized using a traffic-light rating system—Green (Pass), Amber (Monitor/Pass with Conditions), and Red (Fail/Warning)—to determine subsequent monitoring, due diligence, and improvement measures.

For **significant suppliers and/or suppliers identified with elevated ESG risks**, GULF applies enhanced due diligence through:

- **Supplier Desk Assessments with Systematic Verification of Evidence:** Desktop-based review of supplier certificates, policies, procedures, and supporting evidence.
- **Supplier On-Site Assessments – 2nd Party Assessment:** GULF's internal Procurement, Sustainability and SHE teams conduct planned on-site visits to check compliance with labor, OHS, and waste management requirements at suppliers' operational/manufacturing locations.
- **Supplier On-Site Assessments – 3rd Party Assessment:** For specialized due diligence or upstream value-chain validation (particularly in the solar PV and BESS supply chains), GULF engages independent accredited third-party auditing bodies.
- **Recognized Standards and Methodologies:** Assessments are conducted, where applicable, with reference to recognized standards and methodologies, including **SMETA (Sedex)**, **UN Guiding Principles on Business and Human Rights (UNGP)**, **Universal Declaration of Human Rights (UDHR)**, **relevant ILO Conventions**, and **Asian Development Bank (ADB) Safeguard Policy Statement and Environmental and Social Framework**.
- **Supplier Corrective Action/Improvement Plans:** Where gaps or non-compliance are identified, GULF collaborates with suppliers to establish **Corrective Action Plans (CAPs)** addressing **root causes, measurable corrective actions, and defined timelines**, with implementation monitored through closure.

Supplier Development: GULF complements supplier assessments with **supplier development measures** to strengthen ESG capabilities and support continuous improvement. These include **supplier ESG training and capacity building, direct support on corrective action/improvement plans, and targeted technical support** to strengthen suppliers' environmental and social management practices. **In FY2025, all 24 suppliers participated in GULF's supplier ESG training program.**

KPIs for Supplier Assessment and Development



GULF systematically monitors and reports the coverage and progress of its supplier screening, assessment, and development programs, In FY2025, GULF achieved the following:

- **Supplier Screening: 100% of new suppliers (279 suppliers)** were screened using environmental and social criteria. In addition, **100% of Tier-1 suppliers** provided written acknowledgement of GULF's Supplier Code of Conduct as part of supplier qualification.
- **Significant Suppliers:** GULF identified **24 significant Tier-1 suppliers**, based on **ESG risks and/or business relevance**.
- **Supplier Assessment Coverage: 100% of identified significant Tier-1 suppliers (24 suppliers)** were assessed through **desk assessments and/or on-site assessments**, supporting systematic verification of ESG performance and compliance.
- **Substantial Actual/Potential Negative Impacts:** Based on FY2025 assessments, **no significant suppliers were identified with substantial actual or potential negative ESG impacts**. Accordingly, **zero suppliers required an agreed corrective action/improvement plan due to substantial negative impacts**, and **zero supplier relationships were terminated on this basis**.
- **Supplier Development Measures:** GULF provides supplier development measures including **ESG training, capacity building, support on corrective action/improvement plans, and technical support**, as applicable. **In FY2025, all 24 significant Tier-1 suppliers participated** in ESG training and technical workshops.

Thank You

