SEA WINGS FACTORY CO., LTD.

Code of Conduct:

We ensure employees comply to Company's Code of Conduct as follows:

1. Conduct business with integrity and corporate social responsibility in terms of legal and ethical aspects, and

encourage proper behaviors for people, communities, societies, and environments.

2. Treat customers fairly in terms of product and service without discrimination.

3. Conduct business in compliance with standard, proper control, related regulations and laws with capabilities,

discretion, sufficient information and reference.

4. Never disclose confidential business information of customers unless legally authorized.

5. Allow customers to complain about incompleteness of product and service.

6. Disclose complete product and service information.

7. Follow agreements and conditions to ensure fair customer treatment. In case that Company fails to comply with

such agreements, Company must inform customer to share solutions.

Employee Treatment

Management and employees must treat each other fairly, work with unbiased approach, promote capability for

growth, and enhance working efficiency of organization. Moreover, management should promote employees'

understanding about code of conduct, provide proper welfares and treat colleagues and subordinates with

integrity, and accept reasonable comments.

Customer Treatment

Management and employees must treat customers fairly based on strict compliance to Code of Conduct

regulated by Company.

Partner Treatment

Management and employees must treat partners fairly and never request or accept unfair offering from partners.

In case Company fails to comply with such agreements, Company must inform partners to share solutions.

Competitor Treatment

Management and employees must treat competitors fairly under proper competition regulations, and never gather

confidential information of competitors by employing improper approach.

Social and Environmental Treatment

Management and employees must ensure compliance with related laws, regulations, and social responsibility,

support voluntary activities to promote utmost benefits for people and communities.

Policies and Procedures Certificates:

Quality Control

This department is responsible for inspecting and controlling all production processes to minimize excessive

defective products and services, record product control, and report production plan to management. Key focus is

on inspecting root causes of defects which differs from quality assurance that focuses on preventive approach.

Quality control processes are as follows:

1. Follow quality control manual and develop working plan to strictly comply with Company's process.

2. Review customer's requirements and record to ensure understanding among related people and departments

prior to purchasing process.

3. Review quality control and data record to ensure completeness and identify process to collect, store, destroy,

and arrange data index for retrieval.

4. Review quality control process to manage both internal and external data of all departments. Develop

document status list to remove irrelevant documents out of working area and maintain important documents for

each department.

5. Review identification and traceability of product to identify sources of defects and inspect quality.

6. Review production control process, equipment installation, and service under operation scope, ranging from

raw material procurement, production, to finished product. Production improvement must be approved by

authorized person.

7. Review, test, and record quality control of finished product and delivery carefully, and recall defective products

promptly prior to delivery. QC results, either pass or fail, must be recorded.

8. Inspect indicator or testing tool to ensure accuracy and reliability, identify maintenance process and

measurement criteria.

9. Understand testing process and measurement of all production process and prepare symbol/tag separately to

identify pass or fail.

10. Inspect quality control process to remove unqualified products to prevent usage of defective products,

destroy, degrade, recycle, and inspect again.

11. Review customer complaints records from authorized person, develop preventive actions and solutions,

analyze root causes to prevent repeated problem from production or service.

12. Manage record of product transfer, storage, packaging, maintenance, and delivery by authorized person.

13. Monitor quality control process of organization.

14. Arrange training for related employees to understand quality control process.

15. Record statistical methods for analyzing trends of defects to prevent possible defects in the future.

Social Compliance

Company complies with labor and environmental regulations, promote protection of human rights and

environment. Our policy corresponds to goals of international standards, basic working principles and employee

rights. These principles about human rights are well categorized in employment policies and guidance.

Child Labor Protection

Company must not employ people who are under 15 years; seller must not recruit child employees or take

advantage of any child. In case that a child is directly employed by seller, he/she must offer solutions that

address concerns and benefits of a child as priority.

Forced Labor

Company prohibits forced labor, either physical or mental, and such behavior is subject to disciplinary action.

Such manipulation of labor includes forced labor, contracted labor, debt-obliged labor, slave, and human

trafficking related to improper labor treatment.

Discrimination

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Company prohibits any discrimination or abuse based on all aspects of labor protection laws, which include

recruitment, employment, training, compensation, treatment, career growth, working hours, wage, and benefits.

Company must compensate employees involved in industry and/or local labor market in compliance with laws

related to wage, working hours, and employee benefits.

Safe workplace and health consciousness

Company is committed to providing a safe workplace environment that supports employee's health, while

maintaining efficiency by complying with laws and regulations of work safety and health; an approach to minimize

risks of accident, injury, and health concerns.

Environmental Concern

Company ensures compliance with all enforced laws and regulations related to environment.

Business Integrity

Company aims to establish a workplace environment that is free of bribery and corruption by complying with all

enforced laws related to bribery, money laundering, and/or corruption. Moreover, the Company prohibits any

exchange of money or valuable objects with other people, including representative of public sector, which lead to

unfair treatment or favor.

Product Safety Policy

Policy and Procedures:

We set standards to control all production processes, from raw material procurement, product development,

production, selling, and disposal to ensure no concern for customers who use our products.

Regarding raw material procurement, our preventative approach to minimize contamination of chemical

substance that affects human or ecosystem is to test toxic levels of chemical substance. In the production

process, our Safety Committee will assign people to be responsible for inspection of each production process

and assess risk by considering actual usage.

We deploy key management principles to enhance safety of product usage as follows:

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Risk review: Identify possible risks in all production processes, as well as design features and management

approach to minimize such risks.

Safety of product design: Identify product usage (proper use/misuse), as well as design features to minimize such

risks.

Purchasing requirement and control: Confirm raw material procurement based on requirements and

specifications.

<u>Production control:</u> Use training process to ensure consistency and compliance with product requirement.

Environmental Policy

Policy and Procedures:

We are a global leader aiming to promote production safety that complies with customer requirements and related

laws to ensure satisfaction of stakeholders and corporate sustainability.

Company identifies following policies for all levels of customers as operational guidelines:

1. Operate business by considering business objectives, contexts, and environment aspects which are influenced

by company's activities, products, and management

2. Identify objectives of environmental concerns and review regularly

3. Preserve environments and prevent pollution in all aspects related to company's business context by applying

3R principle which are Reduce (natural resources), Reuse, and Recycle in product life cycle that affects

environment

4. Commit to comply with governmental laws, regulations, or agreements related to environment

5. Commit to continuously improve environment management