



SUPPLIER CODE OF CONDUCT

(As of June 13, 2026)

I. INTRODUCTION

St. Augustine Gold and Copper Limited (the “Company”) is committed to conducting its business operations ethically, responsibly, and in full compliance with all applicable laws. This Supplier Code of Conduct (“Code”) sets out the minimum standards and expectations applicable to all suppliers, contractors, vendors, consultants, agents and business partners (“Suppliers”).

II. PURPOSE

This Code establishes clear ethical, legal, environmental, and social expectations across the Company’s supply chain, consistent with Philippine law and internationally accepted standards of responsible business conduct.

III. REQUIREMENTS

A. Compliance with Laws

Suppliers shall comply with all applicable Philippine laws and regulations, including labor, occupational safety and health, environmental protection, data privacy, competition, and anti-corruption laws, including Republic Act No. 3019 (Anti-Graft and Corrupt Practices Act).

B. Labor and Human Rights

Suppliers shall uphold fundamental labor and human rights, including the prohibition of forced or child labor, non-discrimination, freedom from harassment, fair wages and benefits, and lawful working hours, in accordance with the Labor Code of the Philippines and applicable regulations.

C. Health and Safety

Suppliers shall provide a safe and healthy working environment, identify hazards, implement risk controls, and comply with all applicable occupational safety and health standards.

D. Environment

Suppliers shall comply with all environmental laws and shall minimize environmental impacts through responsible resource use, pollution prevention, and proper waste management, consistent with DENR regulations.

E. Integrity and Anti-Bribery

Suppliers shall conduct business with integrity and comply with the Company's Anti-Bribery and Corruption Policy and the Code Business Conduct and Ethics (CBCE). Bribery, facilitation payments, kickbacks, and any other improper benefits, whether involving public officials or private parties, are strictly prohibited.

F. Confidentiality and Intellectual Property

Suppliers shall protect the confidentiality of Company information and respect intellectual property rights, in accordance with applicable laws and contractual obligations.

G. Monitoring, Compliance, and Sanctions

The Company may assess Supplier compliance with this Code. Material or repeated non-compliance may result in corrective action, suspension, or termination of the business relationship, without prejudice to legal remedies.

H. Raising Concerns and Whistleblowing

Suppliers shall promptly report any suspected violations of this Code, the CBCE, or applicable law through the reporting channels under the Company's Whistleblowing Policy. Reports may be made confidentially or anonymously to the email below. Retaliation against any person making a good-faith report is strictly prohibited.

Legal, Compliance and Ethics:	compliance@kingking.ph
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