

Energy Absolute Public Company Limited and its affiliated companies determine and thrive to conduct business with fairness, adhering to social and stakeholder responsibility under the good corporate governance and the business ethics as well as policy and practice guideline for all stakeholders of the Company Group.

The Company attend “**Collective Action Coalition Against Corruption**”¹⁴ to represent of intention and determination in anti-corruption of all forms.

The Company has in place the policy that defines the responsibility and regulations in appropriate operation to prevent corruption in all corporate activities. Besides, the ensure that the decisions and business operation that may have a risk of corruption will be considered and rectified prudently, the company has prepared the “**Anti-Corruption Policy**”¹⁵ in written form as a clear practice guidance in business operation and to achieve the sustainable development.

- **Definition of Anti-Corruption Policy**

Corruption is defined as any types of bribery by means of offering, promising or soliciting of money, assets or other advantages which are considered inappropriate for government agencies, private agencies or the particular person whether directly or indirectly in order for them to act or refrain such person from acting or omitting one’s duty to acquire any other benefits which are not appropriate for the business unless the laws, rules, announcements, regulations and local customs or business practices have allowed so.

- **Anti-Corruption Policy**

The Company is aware of the importance of ethics, morals, and transparency in business operations including corporate social responsibility, the environment, and all stakeholders in accordance with the principles of good corporate governance. The Company prioritizes importance on the compliance with the rules, regulations and laws relating to anti-corruption including anti-corruption promotion activities within the company for better understanding and conscious commitment to against corruption in all forms.

To ensure that the Company has an appropriate risk management system to prevent corruption in all forms, the Company has set an anti-corruption policy to enable appropriate practices and operating regulations to prevent the corruption and to ensure the risk of fraud and corruption that may occur with the operations of the Company has been considered and implemented for prevention appropriately, sufficiently and prudently.

¹⁴ *Approved by the meeting of the board of Directors No.7/2013 on 14 November 2013*

¹⁵ *Approved by the meeting of the board of Directors No.1/2013 on 28 February 2013*

The Company has therefore established a written anti-corruption guideline in writing including explanations, understanding and communication of the said guidelines to the Board of Directors. The Board of directors various sub-committees as well as employees at all levels of the Company and the Company group thoroughly. This is to be considered as a clear guideline for anti-corruption in all forms that may occur in the operations of the Company.

1. Prohibit the directors, executives, employees, and stakeholder groups of the Company and its affiliates proceed or accept all forms of corruption either directly or indirectly for the benefit of oneself, family, friends and acquaintances, covering all businesses in every country and all related agencies and to regularly review the implementation of this anti-corruption policy as well as reviewing the guidelines and operational requirements to be in line with business changes, regulations, and legal requirements.
2. To have measures to prevent and against corruption as a part of the Company's business operations. This is the responsibility of all departments, including directors, executives, employees of the Company and affiliates as well as groups of interested parties to participate in giving opinions on various practices to prevent and against corruption of the Company in order to achieve the Company's policy.
3. The Company must continually improve and develop measures to prevent and against corruption in accordance with relevant rules and regulations including the Code of Conduct and Good Corporate Governance, which must assess the risk of corruption that may occur in the Company's business operations and the preparation of guidelines under good internal control in order to prevent any forms of corruption from occurring in the Company's business operations.
4. The Company must not give or accept bribes or support all forms of bribery Including supervision and control of various donations including charitable donations, donations to political parties including giving or accepting gifts or receiving financial support as well as rewards or other benefits in order to make the transactions transparent and not to convince or motivate related persons, including directors, executives, employees of the Company and its affiliates as well as groups of public and private stakeholders performing improper operations.
5. The Company must provide a suitable, adequate, and sufficient internal control system to prevent corruption in all forms.
6. The Company must communicate the commitment of the Company in preventing and anti-corruption in all forms as well as promoting the knowledge on preventing and anti-corruption to the directors, executives and employees in order to instill good awareness and for all personnel of the Company being aware of their duties and responsibilities in carrying out their duty to fight against corruption in all forms.
7. The Company must provide a transparent financial reporting mechanism in accurate and reliable.

8. The Company must promote good and diverse communication channels in order to receive notification of fraud and corruption from directors, executives, employees and all relevant parties with a guarantee for the whistleblower to be protected by not being unfair punishment or being bullied and including the appointment of a person or group of people to closely monitor and monitor all corruption reports that have been reported.

- **Scope and Responsibilities**

- The Board of Directors:**

- The Board of Directors has duties and responsibilities to determine policies and oversee the effective Anti-Corruption policy, to ensure that the management is aware of and realizes the importance of anti-corruption and cultivate into corporate culture.

- Corporate Governance Committee:**

- Corporate Governance Committee is responsible for setting a policy, rules and guideline in accordance with the principles of good corporate governance which can be considered as an operating guideline for directors, executives and employees at all levels and support a good corporate culture within an organization.

- Audit Committee:**

- Audit Committee is responsible for corporate governance to ensure that the Company has an adequate internal audit system, internal control system, financial report system, monitoring system including law and regulatory compliance system to link with corruption risks that may occur as well as to consider and audit follows the Whistle Blowing policy to ensure that the Company performs with a concise and suitable operation and in accordance with international standards and able to prevent any form of corruptions.

- Risk Management Committee:**

- Risk Management Committee is responsible for setting risk management system as well as to promote and support anti-corruption policy by communicating to employees and related persons including review the process and measures to be in accordance with changing of business, laws and regulations.

- Executive Committee:**

- Their duties and responsibilities are to establish the anti-corruption system, to promote and support the Anti-Corruption policy. Then communicate to employees and all related parties. Moreover, the Executive Committee and Executives also have to review the adequacy of systems and measures to be in conformity with the changes of business, rules, regulations and law provisions.

Internal Auditor:

The Internal Auditors are responsible for auditing and reviewing to ensure business operation is proceeded accurately in line with the policy, code of conduct, authority, practice guideline, law and regulations. The conformity with these requirements is to reflect that the Company's control system is adequate and sufficient to the risks of corruption that may occur. After reviewing and auditing, the Internal Auditors must report the result to the Audit Committee.

Employee:

Employees are responsible to perform duties to ensure consistency with anti-corruption policy. In case those employees have questions or see actions suspected violations or non-compliance with this policy, the employee can report through the whistleblowing and complaint channels of the Company.

■ **Guidelines for the implementation of the anti-corruption policy**

Directors, executives, and employees at all levels, stakeholder groups, and affiliates must comply with this anti-corruption policy including the code of ethics, good corporate governance policies, and guidelines for various groups of stakeholders as well as regulations and regulations about the work of the Company and/or other guidelines that the Company will be determined further and must not directly or indirectly engage in corruption by the following:

1. The Company is very determined and determined to create and maintain the corporate culture as well as raising awareness among personnel in the organization to have a common awareness that corruption is not acceptable to the Company regardless of the form of corruption in any form.
2. There is no circumstance of giving bribery, or receiving bribery, or bribery to various stakeholders' related duties and their responsibilities, either directly or indirectly, in order to gain improper benefits despite being the Company's benefits or personal interests which must be treated as follows:
 - 2.1 Not accepting or giving gifts, souvenirs, or similar items to any person related to their duties, responsibility, and their work both in public and private agencies.
 - 2.2 Not accepting assets, things, gifts, gifts or other benefits which is an inducement or inducement to refrain or omit to perform their duties. However, in the event that it is necessary to receive any property, gift, or other benefit, the recipient should ensure that it is carried out correctly in accordance with the regulations and/or the Company's policy as well as various related laws. In this regard, any property, item, gift, or other benefit which is given to each other in that function, its price should not expensive and should suitable for each occasion.
 - 2.3 Not giving the property, items, gifts, or other benefits which is an inducement or inducement the recipient to make a decision or causing the recipient to not follow the trade practices as if they were with other partners. However, such giving must have a value not more than normal practice and suitable for each occasion.

- 2.4 Not being an intermediary or having any affiliations in offering money, assets, things or other benefits to those involved in the Company's business operations both public and private agencies in exchange for any special privileges that should not be obtained or unlawful or causing government officials to refrain or refrain from performing their duties according to the rules, regulations, and laws as specified.
3. For business operations and procurement with government agencies, do not give or accept bribes of any kind and must be done correctly. And being aware that rules, regulations, laws, rules, or traditions in each locality or in each country, may have different conditions, procedures, or practices. Therefore, contacting government agencies must be transparent, honest, and must proceed in accordance with relevant laws.
 4. In procurement whether done with government sectors or private agencies, it must proceed through the procedures in accordance with the Company's regulations, transparent, and can be inspected.
 5. Expenses for rearing business can do, but it must be reasonable, transparent, and can be inspected and to be in accordance with the ethics.
 6. Charitable donations must do as follows:
 - 6.1 Use of funds or other assets of the company for donations for that charity Must operate on behalf of the company only and must be a foundation charity organizations, hospitals, hospitals, temples, or organizations for social benefits With certificate or reliable can check This must be done through procedures in accordance with the regulations of the company
 - 6.2 Personal charitable donations can be done, but it must not cause suspicion of corruption or for any wrongful interest.
 7. Use of money or assets of the Company in order to support the Company's projects must be specified in the name of the Company only and must have business objectives creating a good image or for the reputation of the Company. Disbursement must specify objectives that are clear, transparent, and can be inspected, and proceed through the procedures in accordance with the Company's regulations.
 8. No political involvement. The Company will adhere to political neutrality, support and adhere to the law under democratic rule. And there is no policy to provide political assistance to any political party whether directly or indirectly.
 9. Directors, executives and employees of the Company and its affiliates must notify the responsible person immediately, and cooperate in the investigation of various facts without neglecting or neglecting to see any action that is considered corruption. However, if in doubt or questions such person may consult with the responsible person through various channels.
 10. The Company will provide fairness and protection for personnel of the Company who refuse or report fraud or corruption in accordance with the protection measures for whistle blowing, any offense and corruption without any action that is unfair to the whistleblowers, such as reducing positions, punishing or negatively affecting employees who refuse corruption, etc., although the said actions will cause the Company to lose business benefits or opportunities.

11. The Company considers that any corruption by directors, executives, employees of the Company and its affiliates, is a violation of the ethics and regulations of the Company. Such persons shall be subject to disciplinary consideration in accordance with the regulations stipulated by the Company, including legal penalties.

The Company is aware and gives importance to the dissemination of knowledge and understanding about anti-corruption policies. Corruption of the Company both personnel within the company including external parties involved in the company's business operations.

Conditions and consideration for receiving complaints / Whistleblowing

- 1.) Details of the complaint must be true, clear, and have enough information to conduct a fact search for further action.
- 2.) The complainant can choose not to reveal themselves in order to protect the complainant.
- 3.) Information that the Chairman of the Audit Committee received will be considered a secret and reveal as necessary with regard to the safety of the complainant.
- 4.) Complaints that have been screened and investigated will be reported to the Board of Directors to consider and determine suitable measures.
- 5.) Complainants will be protected despite being a company employee and outsiders.

Whistleblowing / Complaint Channels

Shareholders, directors, executives, employees and stakeholders in all groups can give clues in case of doubt or see actions suspected of violation or failure to comply with laws, regulations, or business ethics or events that may cause damage to the Company to the Chairman of the Audit Committee, which the Company will keep the said information confidential in order to prevent the whistleblower to suffer. Channels for whistleblowing are as follows:

- ❖ Letter to the recipient of the complaint :

Chairman of the Audit Committee

Address: Energy Absolute Public Company Limited

16th Floor, AIA Capital Center Building, No. 89

Ratchadaphisek Road, Dindaeng Sub-district,

Dindaeng District, Bangkok 10400 Thailand

- ❖ E-mail Address

chairman.audit.com@energyabsolute.co.th

Implementation

1. Notify the progress/ consideration result of complaints to whistle-blower who disclosed his/her name and contact address;
2. The Company reserved its rights to not disclose any information and details concerning the interrogation or disciplinary action affecting the personal information and confidentiality.

Whistleblowing procedures

1. The whistleblower is the Company's employee and outsider.
2. The person receiving the complaint in accordance with the channels specified by the Company is the Chairman of the Audit Committee.
3. Channels for reporting complaints / clues via:
 - chairman.audit.com@energyabsolute.co.th
 - www.energyabsolute.co.th
 - Send mail by post
4. Consider the facts and investigate and then report the results to the Board of Directors to determine further measures.