



The Announcement of Board of Directors,
Ratch Pathana Energy Public Company Limited
No. 3/2024
Anti-Corruption Handbook

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1. Introduction

Ratch Pathana Energy Public Company Limited places strong emphasis on conducting its business in accordance with the principles of good corporate governance, with a firm commitment to transparency and fairness. The Company is dedicated to operating with integrity and corporate responsibility toward society and all stakeholders, in alignment with corporate governance best practices and business ethics. On February 18, 2014, the Company signed the Declaration of Intent to join the Thai Private Sector Collective Action Against Corruption (CAC). The Board of Directors approved the Anti-Corruption and Bribery Policy on February 18, 2015, which received its initial certification on October 14, 2016. The Company has consistently upheld this commitment to maintain its membership status in the Thai Private Sector Collective Action Against Corruption (CAC) and to extend this commitment to its subsidiaries.

To ensure that the implementation of the Anti-Corruption and Bribery Policy aligns with the Company's business direction, the policy is reviewed on an annual basis. This is to ensure that the Company has clearly defined accountability, operational guidelines, and risk-based controls for all activities that may pose a risk of corruption. The Board of Directors' Meeting of Ratch Pathana Energy Public Company Limited No. 5/2567 on June 26, 2024, resolved to approve the Anti-Corruption and Bribery Policy for the Company and its subsidiaries as follows:

2. Objectives

The Company has formally established a written Anti-Corruption and Anti-Bribery Policy Handbook, which outlines the Company's compliance framework, ethical standards, and governance practices as follows:

- 2.1 Demonstrate commitment and intent to combat corruption.
- 2.2 Establish clearly defined evaluation criteria and operational protocols for business conduct to mitigate corruption risks.
- 2.3 Establish audit criteria and oversight mechanisms to ensure appropriate adherence to the anti-corruption policy.

3. Scope of Policy

- 3.1 This practice applies to the Board of Directors, sub-committees, executives, and employees.
- 3.2 This practice covers customers, business partners, all stakeholders, and business-related parties acting on behalf of the Company.

4. Definition

Any terms or expressions used in this practice shall have the following meanings unless otherwise stated or defined.

- 4.1 **Corruption** refers to the abuse of power or omission of duty to obtain undue benefits for the organization, oneself, or others constitutes corruption, which includes giving and/or receiving bribes, conflicts of interest, coercion and/or solicitation of advantages or other benefits to public officials, state enterprises, or responsible persons, directly or indirectly, to gain or retain improper business advantage.

Unless permitted by law, regulation, official announcement, rule, local custom, or commercial practice.

- 4.2 **Fraud** refers to Intentional misconduct to seek undue benefits in violation of duty or law for oneself or others (e.g., family, relatives, friends, and acquaintances). Corruption includes bribery, asset misappropriation, and reporting fraud, whether direct or indirect, including payments, assets, or any advantages made directly by the Company or through customers, business partners, or third parties.
- 4.3 **Embezzlement** refers to any act resulting in improper possession of Company assets or causing loss of assets, opportunities, or benefits with intent to seek undue advantage for oneself or others.
- 4.4 **Reporting corruption** refers to manipulation of financial statements, accounting records, or non-financial reports to conceal asset misappropriation or misconduct, or to seek undue benefits for oneself or others, resulting in inaccurate financial or corporate reporting.

5. Types of Corrupt Practices Prohibited by the Company

- 5.1 **Political Contribution** refers to providing financial support, goods, and/or participation in activities, including encouraging employees to engage in political activities on behalf of the Company to gain business advantage, excluding employee participation under individual freedom.

The Company maintains a neutral business policy, refraining from political affiliation or support to professional politicians associated with any political party,

and shall not provide funding or other forms of assistance for political contributions as defined above, with the intent to gain business advantage.

- 5.2 **Charitable Contribution** refers to activities involving monetary expenditures, assets, and tangible items provided to government agencies, state enterprises, healthcare institutions, the Thai Red Cross Society, temples, foundations, and public charitable organizations, as well as projects and activities intended to benefit communities and society without the pursuit of commercial returns.
- 5.3 **Sponsorship** refers to Activities involving monetary expenditures, assets, or other forms of benefits paid or received, reasonably provided to customers, partners, communities, or business stakeholders to foster goodwill or relationships, for business promotion, brand recognition, or corporate reputation, excluding promotional support governed by contractual commercial agreements.
- 5.4 **Gift** refers to Any items of value received or provided by the company to business-related parties to foster goodwill or relationships, within reasonable value and in accordance with local festivals and cultural traditions.
- 5.5 **Entertainment and Hospitality** refers to expenses for food, beverages, hospitality items, and other services received or provided by the company to business-related parties, reasonably paid to foster goodwill or relationships, or in accordance with commercial customs, cultural traditions for expressing congratulations, appreciation, welcome, condolences, or courteous assistance practiced in society.
- 5.6 **Hospitality expenses** refer to expenses for food, beverages, hospitality items, and other services received or provided by the company to business-related parties in both public and private sectors to foster relationships and goodwill.
- 5.7 **Facilitation Payment** refer to informal payments made to government officials solely to ensure procedural actions or to expedite processes that do not require discretion and are part of the officials' lawful duties, including entitlements under the law such as license applications, certification requests, and access to public services.
- 5.8 **Revolving Door** refers to engagement of individuals who are current or former government officials, politicians, or advisors to government agencies by private companies, where such individuals may leverage relationships or internal information to benefit the private company, potentially resulting in conflicts of interest between the duties of government agencies or regulatory bodies and the companies under their supervision, with the intent to gain unfair business advantage or influence policy-making in favor of the private company employing the former government official.

- 5.9 **State official** refers to political office holders, civil servants or local government employees with official positions or fixed salaries, employees or individuals working in state enterprises or government agencies, local administrators, and non-political members of local councils, officials under the law governing local administration, including board members, subcommittee members, and employees of government departments, state enterprises, or government agencies, as well as individuals or groups authorized or delegated to exercise governmental administrative power under the law, whether established within the bureaucratic system, state enterprises, or other state operations.
- 5.10 **Conflict of Interest** refers to situations or actions involving a conflict between personal interests and the interests of the company, whether directly or indirectly.
- 5.11 **Business relationships with customers, partners, public sector, and private sector** refers to company's operations, including the development and maintenance of business relationships with customers, partners, public sector, and private sector, must be conducted with transparency and integrity, in compliance with internal procedures, procurement processes, and applicable laws, and must not involve giving or receiving bribes in any business activities of the company.
- 5.12 **Kickbacks** refers to transfer of a sum of money to a government official or a private party as compensation for assisting the company in obtaining a project or contract, where the payment originates from an overbilling scheme in which the company proposes an inflated project value and subsequently shares the excess amount with the individual.
- 5.13 **Collusion** refers to collusion and other similar actions such as bid rigging, specification fixing, and the use of confidential insider information.
- 5.14 **Conflict of Interests** refers to nepotism and cronyism, such as entering into exclusive contracts with associates or supporter groups, as well as hiring former government officials to gain benefits from their information, influence, or relationships (revolving door).

6. Roles and responsibilities

- 6.1 **Board of Directors** have to be responsible for setting policies and overseeing the implementation of an effective anti-corruption system, reviewing the anti-bribery and corruption policy and practices to ensure that management prioritizes anti-corruption and embeds it into the corporate culture.
- 6.2 **Audit Committee** have to be responsible for reviewing the financial reporting and accounting system, internal control system, internal audit system, risk management system, and corruption risk, as well as overseeing and reviewing anti-corruption

measures to ensure they meet international standards, are robust, appropriate, and effective.

- 6.3 **Corporate Governance and Risk Management Committee** have to be responsible for overseeing and supporting governance and risk management operations through organizational risk assessment and corruption risk assessment, including reviewing governance, risk management, and anti-corruption measures to ensure adequacy and reporting to the company's board of directors.
- 6.4 **Executive Committee and Management** have to be responsible for establishing systems, promoting, and supporting the anti-bribery and corruption policy to communicate with company employees and all relevant parties, including reviewing the adequacy of systems and measures to align with changes in business, laws, company regulations, work-related rules, announcements, and other measures (if any).
- 6.5 **Internal Audit** have to be responsible for auditing and reviewing operations to ensure compliance with the anti-bribery and corruption policy, delegated authority, operational procedures, applicable laws, and regulatory requirements, to ensure that the control system is appropriate and sufficient for potential corruption risks, and reporting to the audit committee.
- 6.6 **Employees** have to be responsible for performing duties in alignment with the anti-bribery and corruption policy and related practices. In case of doubt or detection of policy violations, a report must be made to the supervisor or through the designated whistleblowing channel.

7. Standard guidelines

- 7.1 Directors, executives, and employees of the company must comply with the anti-bribery and corruption policy and the company's code of conduct, and must not be involved in corruption, whether directly or indirectly, for the benefit of themselves, their families, relatives, friends, or acquaintances.
- 7.2 Company employees must not neglect or ignore any observed acts of corruption related to the company. Such incidents must be reported to supervisors or responsible persons, and employees must cooperate in fact-finding investigations. In case of doubt or inquiries, consultation should be made with supervisors or designated persons responsible for monitoring compliance with the code of conduct for directors, executives, and employees through the specified reporting channels.
- 7.3 The company shall ensure fairness and protection for employees who refuse or report corruption related to the company, by applying whistleblower protection measures or measures for those cooperating in reporting bribery and corruption, as

specified by the company. No actions shall be taken to demote, penalize, or negatively impact employees who reject corruption, even if such actions result in the loss of business opportunities. The company has established operational procedures for each department as guidelines, defining roles, responsibilities, and monitoring processes.

- 7.4 The company recognizes the importance of disseminating, educating, and ensuring understanding among individuals who perform duties related to or potentially impacting the company, regarding compliance with the anti-bribery and corruption policy.
- 7.5 The company is committed to building and maintaining a corporate culture that upholds corruption as unacceptable in all transactions with both the public and private sectors.
- 7.6 The company shall establish procurement guidelines, starting from the code of conduct, procurement agreements, selection of partners in both public and private sectors, and price evaluation, approval limits, issuance of purchase orders, receipt and inspection of goods or services, quality verification, returns and credit notes, invoicing, and payment, as part of the business conduct guidelines for procurement operations.
- 7.7 The company exercises control over transactions with related parties who may have conflicts of interest, in accordance with good corporate governance principles and ethical business conduct as announced by the Capital Market Supervisory Board and the Stock Exchange of Thailand.
- 7.8 The company will integrate the anti-bribery and corruption policy into human resource management, including recruitment and selection, training, performance evaluation, compensation, and promotion. Supervisors at all levels are required to communicate and ensure understanding with employees to apply the policy in business activities under their responsibility and to oversee effective implementation.
- 7.9 In cases where the company intends to hire a government employee or official, such employment must not pose a corruption risk in terms of conflicts of interest, potential bias, or attempts to influence public policy in favor of the company. Such matters must be submitted to the company's board of directors for approval only.
- 7.10 The company maintains a transparent and auditable accounting and record-keeping system to ensure the integrity, accuracy, and appropriateness of financial transactions. All operational activities are supported by complete and verifiable documentation in compliance with applicable standards, governance principles, and regulatory requirements.

7.11 The company has established audit mechanisms, internal controls, and risk management systems to ensure that its operations are robust, adequate, and capable of preventing corruption.

7.12 Directors, executives, and employees who violate or fail to comply with the company's anti-corruption policy shall be subject to disciplinary measures in accordance with the company's procedures and may face civil and criminal penalties if the actions are unlawful.

7.13 The company mandates an annual review of the appropriateness of its anti-corruption policy and related regulations.

8. Ground Rules and Methodology

8.1 Political Contributions and Support

1. The company adheres to a constitutional monarchy and maintains a politically neutral policy, refraining from providing support or engaging in any actions that favor any particular political party.
2. Employees have the right to participate in political activities under the provisions of the law but must not misrepresent their status as company employees or use company assets, equipment, or tools for political purposes. If participating, they must exercise caution to avoid any actions that may imply the company's support or affiliation with any political party.
3. In the case where a company intends to provide support for political activities in order to promote democratic governance, such support must not violate any applicable laws or be conducted with the expectation of receiving preferential treatment. The matter must be submitted to the Board of Directors for approval only.

8.2 Donation

The company has a policy to make charitable donations to public benefit organizations and has consistently provided support to such entities. For example, the Dr. Thiam Chokwatana Foundation, founded by the founder of Sahapat Group, is a charitable organization with the objective of promoting community engagement activities and supporting national development in various areas, particularly in public health and education for children and youth in remote communities.

This is in accordance with the charitable donations policy.

8.3 Support

The company has a policy to provide support within feasible means and at an appropriate value, in compliance with applicable laws. Such support may take various forms, including education initiatives, promotion of arts and culture, and sports activities.

This is in accordance with the support policy.

8.4 Receptions, receipts and grants of gifts

The company has a policy not to give or receive gifts, gratuities, or hospitality that may influence any decision-making. Exceptions are made for giving or receiving gifts, gratuities, and hospitality that are reasonable and customary, intended to maintain good relationships with business stakeholders, and are within feasible means, appropriate in value, and in accordance with applicable laws and customs.

This is in accordance with the gifts, gratuities, and hospitality policy.

8.5 Hospitality and Facilitation Expenses

The company has no policy to make facilitation payments or provide hospitality services to expedite any process, unless such payments are made in accordance with customary practices.

This is in accordance with the gifts, gratuities, and hospitality policy.

8.6 Employment of Government Officials or Public Sector Employees

In the case where the company intends to hire government employees or public officials, such hiring must not pose a risk of corruption in terms of conflict of interest, potential lack of impartiality, or attempts to influence public policy in favor of the company. The matter must be submitted to the Board of Directors for approval only.

In the case where government employees or public officials perform work for the company.

1. The appointment of former public officials or individuals who previously worked for regulatory agencies directly related to the company must be made only if they have left such positions for no less than two years prior to assuming roles as Board of Directors, executives, employees, or consultants of the company.
2. The company has a process for conducting background checks on individuals being considered for appointment as Board of Directors, executives, employees, or consultants of the company, in order to assess potential conflicts of interest prior to any appointment or hiring.
3. The approval of employment and determination of compensation for hiring government employees or public officials to hold positions in the company, from the level of executives downward, must be carefully considered for necessity and must comply with the company's internal policies.

4. The approval of employment and determination of compensation for hiring government employees or public officials to serve as Board of Directors must be carefully reviewed for justification by the Nomination and Remuneration Committee and submitted for approval to the Board of Directors.
5. Disclosure of employment of government employees or public officials shall be included in the company's annual report (Form 56-1 One Report) to ensure transparency.

In the case where individuals of the company perform work for government agencies.

1. Individuals of the company may perform duties to support public policy work for government agencies, provided that the company is notified immediately upon appointment.
2. In the case where Board of Directors, executives, or employees of the company engage in public policy duties, they must perform their responsibilities with caution and diligence, in accordance with legal and ethical standards, to prevent abuse of power or conflicts of interest.
3. Disclosure of information regarding individuals of the company who perform work for government agencies shall be included in the company's annual report (Form 56-1 One Report) to ensure transparency.

8.7 Conflict of Interest

The company exercises control and oversight over transactions with parties having conflicts of interest with the company and its subsidiaries, in accordance with corporate governance principles, and in compliance with the notification of the Capital Market Supervisory Board and the Stock Exchange of Thailand.

The following are the policy guidelines:

1. Not engaging in competitive business activities, whether directly or indirectly, against the company.
2. Avoid engaging in related party transactions involving oneself or related individuals/entities that may lead to conflicts of interest with the company.
3. Ensure the company complies strictly with the regulatory requirements, procedures, and disclosure of related party transactions as prescribed by law or regulatory authorities, and in accordance with the company's internal policies.
4. Stakeholders must not be involved in the consideration of related party transactions in which they have conflicts of interest.
5. In the case where it is necessary to conduct related party transactions, such transactions must follow arm's length conditions, be approved in accordance with principles set by the Board of Directors, and carried out with transparency and fairness, equivalent to transactions with external parties, and with consideration for the best interests of the company.
6. In the case of related party transactions that do not follow arm's length conditions as approved by the Board of Directors, or where the nature and size of the transaction exceed the authority

of management, the transaction must be reviewed and commented on by the Audit Committee prior to seeking approval from the Board of Directors or shareholders.

7. The company handles conflicts of interest with care, fairness, and reasonableness, through a transparent approval process for entering into transactions.
8. Board of Directors, executives, and employees of the company should prioritize the best interests of the company over personal gain and must perform their duties in accordance with legal and ethical standards, without providing preferential treatment to any individual.
9. Directors, executives, or employees of the company must not make decisions regarding transactions in which they or related parties have a conflict of interest.
10. Directors, executives, or employees of the company must not seek personal gain or benefit for others from information or any assets obtained through their position and responsibilities.

8.8 Business Relationships with Customers, Partners, Public Sector, and Private Sector

The company's operations and its development and maintenance of business relationships with customers, partners, the public sector, and the private sector must be conducted with transparency and integrity. All activities must comply with relevant procurement procedures and applicable laws. The company strictly prohibits giving or receiving bribes in any business activity.

1. **Customers:** The company establishes operational procedures related to customer processes and practices, starting from needs identification, communication, delivery, and customer relationship management.
2. **Partners:** The company establishes procurement procedures and operational practices, starting from quotation, selection and evaluation of suppliers and contractors, with effective monitoring and control for audit and prevention of non-compliance with agreements or contracts. The selection of suppliers from both public and private sectors, price consideration, approval limits, purchase orders, receipt and inspection of goods or services, quality verification, returns and credit notes, invoicing, and payment are included in the business conduct guidelines for procurement.
3. **Public Sector:** The company provides an operational manual outlining procedures for obtaining various licenses from government agencies relevant to the business, ensuring that employees or designated personnel prepare documentation accurately and in compliance with applicable regulations and laws.

These practices are in accordance with the operational procedures related to customer processes, procurement procedures, and the operational manual for licensing processes with relevant government agencies.

8.9 Kickbacks / Collusion

The company has no policy of making payments to public or private sector officials as compensation for securing projects or contracts. Such payments, including those derived from overbilling schemes and shared with involved individuals, as well as collusive practices such as bid rigging, specification manipulation, and the use of confidential insider information, are strictly prohibited.

8.10 Conflict of Interests

The company has no policy of nepotism or cronyism. All operations are conducted with transparency and integrity, and the company does not engage in exclusive contracts with family members, relatives, friends, acquaintances, or supporting groups, unless such actions comply with procurement procedures and applicable laws.

8.11 Sales and Marketing

The company prohibits any offers, promises, requests, or demands that indicate corrupt behavior in all types of business operations. Engagements with customers from both public and private sectors must be conducted with transparency, integrity, fairness, and in compliance with applicable laws.

8.12 Investment and Borrowing Commitments

The company maintains an investment and borrowing policy aligned with good corporate governance principles. Any increase, decrease, or new investment, as well as borrowing or incurring obligations, must be approved through the authority of the Audit Committee and the Board of Directors.

The company has no policy of soliciting, receiving, offering, or providing financial or other benefits to any individual or entity in exchange for business contracts, loan agreements, privileges, or to create or eliminate financial obligations. All actions or omissions that violate applicable laws or ethical standards are strictly prohibited under the company's anti-bribery and corruption framework.

8.13 Accounting and Finance

The company maintains accounting and financial practices in accordance with good corporate governance principles. Internal controls, risk management, and compliance with relevant laws, regulations, and standards are in place. Key information is adequately disclosed in financial statement notes, management discussion and analysis of financial position and performance of the company and its subsidiaries. These measures ensure accurate, complete, and sufficient accounting records to safeguard company assets and prevent fraud.

These practices are in accordance with the accounting and financial guidelines.

8.14 Whistleblowing Channel

The Company provides employees and stakeholders an opportunity to report misconduct, illegal activities, corruption, or unethical behavior by the company’s employees, as well as actions that could pose problems or cause harm to the company. Additionally, it includes the submission of complaints in cases where employees or stakeholders experience violations of rights or unfair treatment through the channels and processes established by the company. The details are as follows:

1. Reporting may be made verbally or in writing directly to the immediate supervisor. If no action is taken, the report should be escalated to a higher-level supervisor or the Human Resources Management and Development Manager.
2. Suggestion box
3. Email or company’s website
 - 3.1 Via <https://www.ratchpathana.com>
 - 3.2 Via Email

หน่วยงาน	E-mail Address
The Board of Directors	directors@ratchpathana.com
The Audit Committee	auditcommittee@ratchpathana.com
The Corporate Governance and Risk Management Committee	cgcommittee@ratchpathana.com
The Managing Director	MD@ratchpathana.com
Human Resource Management and Development Division	hrmanager@ratchpathana.com

4. The petition and information can be sent by postal service to the Chairman of each committee (Chairman), Managing Director, and Human Resource and Administration Department. The address is as follows:

Ratch Pathana Energy Public Company Limited
636 Moo 11, Sukhaphiban 8, Nongkham sub-district
Sriracha District, Chonburi 20230

In addition, the company will confidentially keep related information and prioritize the security of the complainant, except when disclosure is required by law.

8.15 Whistleblower Protection Measures

1. Whistleblowers, complainants, or informants may choose to remain anonymous if disclosure could lead to a sense of insecurity or potential harm. However, if the individual chooses to identify themselves, it will enable the company to report progress, clarify facts, or mitigate damage more efficiently.



2. The company will keep confidential the name, address, or any identifiable information of the complainant or informant. Such information will be restricted to responsible personnel handling the investigation, unless disclosure is required by law. These practices shall follow the whistleblower protection measures outlined in the company's code of conduct for directors, executives, and employees.
3. The company will prevent any form of intimidation or harassment against whistleblowers, complainants, or informants during the investigation process, and disciplinary actions will be taken against those who engage in such behavior.
4. The company will disclose only necessary information, with consideration for the safety and potential harm to the reporter. Any source or individual affected will be provided with appropriate and fair remediation processes.
5. If an investigation finds no wrongdoing as reported in the whistleblowing or complaint, the company will not penalize the reporter acting in good faith. Any affected parties will receive appropriate and fair remediation.
6. The company will not demote, penalize, or retaliate against employees who file complaints, cooperate in investigations, or refuse to engage in corruption, even if such actions result in the loss of business opportunities.
7. In cases where there is clear and sufficient evidence that a whistleblower report, complaint, or disclosure was made with malicious intent, resulting in harm to the accused party or the company, the company shall conduct an investigation and impose disciplinary measures and/or pursue legal action against the whistleblower or complainant who is an employee. For external whistleblowers or complainants, the company shall consider pursuing legal action in accordance with applicable laws.
8. Protection measures may be requested by the complainant or cooperating individual or may be initiated by the company without request if the situation is likely to cause distress, harm, or safety concerns.
9. The company shall not engage in any unfair treatment toward whistleblowers, complainants, or individuals cooperating in investigations, including changes in job position, job responsibilities, workplace location, suspension, intimidation, interference with duties, termination, or any other form of unfair conduct.

8.16 Employee Protection

The company shall not engage in any unfair treatment toward whistleblowers, complainants, or individuals cooperating in investigations, including changes in job position, job responsibilities, workplace location, suspension, intimidation, interference with duties, termination, or any other form of unfair conduct.

8.17 Human Resource Management

The company has clear operational policies and business conduct guidelines, including a strict prohibition on bribery and improper benefits in any form from job applicants or related parties during both the recruitment process and probationary evaluation, to ensure fair and transparent employee onboarding.

This is in accordance with the processes and procedures related to human capital management and human capital development.

8.18 Training and Communication

1. The company regularly provides anti-corruption training and awareness programs through various channels such as orientation programs, seminars, and public disclosures, to promote understanding of the anti-bribery and corruption policy, anti-corruption measures, corruption risk exposure, and the company's expectations, as well as whistleblowing mechanisms and the disciplinary actions for violations.
2. The company communicates its anti-bribery and corruption policy, related compliance practices, and business conduct guidelines to directors, executives, employees, shareholders, customers, suppliers, all stakeholder groups, business partners, and business representatives through appropriate communication channels, with general methods of notification as follows.
 1. Public Disclosure on the Company Website.
 2. Distribution of printed materials or announcements.
 3. Internal Communication through the Group's Network, such as via Intranet Bulletins and Email.
 4. Creation of awareness materials or symbols representing the company's anti-bribery and corruption policy.
 5. Organizing collaborative initiatives or campaigns involving directors, executives, employees, customers, suppliers, all stakeholder groups, and relevant parties, with embedded objectives to support the company's anti-bribery and corruption policy.

Internal Communication

1. The group's various policies, related compliance practices, and business conduct guidelines are published and made available through internal communication tools.
2. Notices are posted on the company's employee communication board regarding updates, the anti-bribery and corruption policy, related compliance practices, and

business conduct guidelines, to ensure employees are informed and aligned in their actions.

3. Organizing at least once a year, the company arranges engagement sessions between executives and employees to communicate and clarify the anti-bribery and corruption policy, related compliance practices, and business conduct guidelines, including questions and answers on implementation, addressing issues, and jointly identifying appropriate solutions.
4. An annual training plan or training upon changes is arranged, along with employee assessments for all company staff.

External Communication

1. The counterparty acknowledges and agrees to comply with the company's anti-bribery and corruption policy and related compliance practices. Any breach of these provisions may result in contract termination or other disciplinary actions as deemed appropriate by the company. Example clause:
 - In the service contract for project success, a condition shall be included stating that employees or representatives of the company must not solicit or accept any bribery or improper benefits from employees or representatives of the service provider under this agreement. If either party discovers such conduct, a written notification must be promptly submitted to the other party. Both parties shall have the right to terminate the business contract or service agreement without liability for any damages resulting from such termination.
 - Printing statements that reflect the company's Anti-Corruption Policy in all forms, and encouraging all contracting parties to adopt similar practices, such as including the statement on business documents like purchase orders: "Ratch Pathana Against Corruption"
2. Creating awareness materials or symbols that represent the company's anti-bribery and corruption policy on items distributed to customers or suppliers, such as during festive occasions, business events, or promotional activities.
3. Conducting a customer satisfaction survey that includes topics on transparency in operations and the absence of bribery or improper benefits.
4. Preparing a formal letter or document to inform all customers and suppliers about the company's anti-bribery and corruption policy, specifically regarding the acceptance of gifts, gratuities, and entertainment of clients or business partners, during festive occasions or business events.

8.19 Data Recording and Retention

The company operates in accordance with its policies concerning data governance, with a commitment to maintaining standards related to information systems, IT infrastructure, and communication systems, which are essential foundations for establishing effective internal controls. Measures are implemented to ensure that data, systems, and IT infrastructure are protected and available for continuous business operations. The design and cost of control measures are aligned with the risk levels associated with data, systems, and IT infrastructure as follows:

1. Define the responsibilities of data users and data custodians across all information systems and IT infrastructure.
2. Assess and establish risk control systems appropriate to evolving environmental conditions.
3. Establish protection systems for information assets, operational systems, and IT infrastructure, including data confidentiality, information security, and relevant personnel responsibilities.
4. Establish data protection systems to prevent unauthorized access, modification, or processing of information assets, whether caused by accidental actions or intentional misconduct.

Subject to record control procedures.

8.20 Data disclosure

The company discloses information to directors, executives, employees, shareholders, customers, partners, all stakeholder groups, and relevant parties in a transparent, accurate, and timely manner, in accordance with applicable laws and regulations. This includes both periodic disclosures and event-driven disclosures that affect shareholder rights, as well as other disclosures aligned with the principles of good corporate governance of the Stock Exchange of Thailand, provided that such disclosure does not compromise the company's legitimate interests. Information is disclosed through the annual registration statement / annual report (Form 56-1 One Report) and the sustainability *report*, in both Thai and English, via the Stock Exchange of Thailand's platform, the company's website, and other accessible and equitable channels.

8.21 Audit process and internal control

The company conducts an annual internal audit process, ensuring the independence and unrestricted scope of internal auditors. In addition, external audits are conducted by certified auditors on a quarterly and annual basis in accordance with relevant regulatory requirements.



The audit committee reviews the internal controls to ensure that business operations are conducted within an appropriate and lawful framework, in compliance with company policies, laws, and applicable regulations.

Each department is required to establish written procedures for processes with corruption risk, to be reviewed and approved by authorized management. These procedures must ensure a clear segregation of duties, promote transparency and independence in operations, and support the prevention and detection of fraud risks. All documents must be stored in accessible locations and communicated to relevant personnel. Department heads should *review* these procedures annually or upon any material changes to ensure alignment with internal control principles and current operations.

8.22 Sanctions and disciplinary actions

The company will impose disciplinary actions on directors, executives, and employees who engage in misconduct, intimidation, harassment, or negligence in relation to the company's anti-corruption *policy*. Such individuals will be subject to penalties in accordance with the company's regulations and/or legal proceedings. In cases involving external parties whose actions cause damage to the company, the company reserves the right to pursue legal action.

In cases where business partners or stakeholders fail to comply with the company's anti-corruption policy and procedures—whether by committing violations, neglecting to report misconduct, or providing false information—the company may consider terminating contracts or ceasing business relationships.

lack of awareness of the company's anti-corruption policy, related procedures, or applicable laws cannot be used as a justification for non-compliance.

8.23 Monitoring, review, and audit

The company requires regular monitoring, review, and audit of the anti-corruption policy and related procedures on an annual basis by all relevant parties according to their assigned responsibilities. If there is any suspicion that an activity or business transaction may violate this policy, applicable laws, or regulations, such concerns must be reported to the Managing Director or relevant personnel through the company's whistleblowing or complaint channels.

Announced on 26 June 2024

Sujarit Patchimnan
(Mr. Sujarit Patchimnan)
Chairman

Reference documents

- (1) Principles of Good Corporate Governance
 - (1.1) Corporate Governance Policy
 - (1.2) Eight Principles of Good Corporate Governance
 - (1.3) Business Ethics
 - (1.4) Code of Conduct for Directors, Executives, and Employees
- (2) Anti-Corruption Policy
- (3) Charters of Each Board Committee
- (4) Approval Authority Regulation
- (5) Approval Authority Regulation

Annex

1. Guidelines on Donation Practices
2. Guidelines on Support Measures
3. Guidelines on the Acceptance and Offering of Gifts, Tokens, and Hospitality
4. Operational Manual on Accounting and Financial Procedures
5. Operational Manual on Procedures for Obtaining Permits from Relevant Government Agencies

Documents within the ISO 9001 Quality Management System

6. Management System Manual
7. Standard Operating Procedures for Human Resource Management and Development
 - Work Instruction on Internal Training Procedures
 - Work Instruction on External Training Procedures
8. Standard Operating Procedures for Procurement and Purchasing Processes
9. Standard Operating Procedures for Customer-Related Processes
10. Standard Operating Procedures for Record Control