



The Announcement of Board of Directors,
Ratch Pathana Energy Public Company Limited

No. 4/2024

Anti-Corruption Handbook

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1. Introduction

Ratch Pathana Energy Public Company Limited (“the Company”) places a strong emphasis on conducting its business in accordance with the principles of good corporate governance. The Company is deeply committed to operating with transparency, fairness, and integrity, in alignment with its corporate values and its responsibilities to society and all stakeholder groups. This commitment reflects the Company’s dedication to ethical business conduct, stakeholder engagement, and sustainable development, in accordance with internationally recognized governance and compliance standards.

On February 18, 2014, the Company signed a declaration of intent to join the Thai Private Sector Collective Action Coalition Against Corruption (CAC), demonstrating its commitment to anti-corruption efforts and ethical business conduct. On the same date, the Board of Directors approved the Company’s Anti-Corruption Policy, reinforcing its governance framework and aligning with international standards for transparency, accountability, and corporate integrity.

On February 18, 2015, the Company initiated the CAC certification process and successfully received its first certification on October 14, 2016. Since then, the Company has continuously upheld its anti-corruption principles to maintain its CAC membership status. This includes extending anti-corruption policies and practices to its subsidiaries, ensuring consistent compliance and ethical standards across the organization.

To ensure that practices are aligned with the company’s Anti-Corruption and Anti-Bribery Policy and the strategic direction of its business operations, an annual review is conducted. This review aims to ensure that the company has clearly defined responsibilities, operational guidelines, and criteria for all activities that may pose a risk of corruption or bribery. the Board of Directors’ meeting of Ratch Pathana Energy Public Company Limited No. 5/2024, held on June 26, 2024, has approved the Whistle Blowing Policy of the company and subsidiaries. The details are as follows.

2. Objectives

The company has developed a written Anti-Corruption and Anti-Bribery Policy Handbook, which includes the following:

- 2.1 A clear demonstration of the company's intention and commitment to preventing corruption and bribery in all forms.
- 2.2 The establishment of well-defined criteria and operational guidelines for evaluating and conducting business activities, aimed at mitigating corruption-related risks and ensuring compliance with ethical standards.
- 2.3 The company has established robust audit and oversight mechanisms to ensure effective compliance with its anti-corruption and anti-bribery policy. Proper implementation of this policy is critical to upholding ethical standards, promoting transparency, and mitigating corruption-related risks across all operations.

3. Scope of Policy

- 3.1 This code of conduct applies to the Board of Directors, sub-committees, executives, and employees of the company.
- 3.2 This code of Conduct which includes to customers, business partners, stakeholder groups, and relevant business parties who act or carry out activities on behalf of the company.

4. Definition

Any terms or expressions used in this Code of Conduct shall have the following meanings, unless otherwise stated or specifically defined.

- 4.1 **Corruption** refers to the exercise of authority or refraining from performing a duty in order to obtain undue benefits for the organization, oneself, or others. Corruption includes the giving and/or receiving of bribes, conflicts of interest, intimidation and/or solicitation of benefits, or any other advantages to officials of government agencies, state enterprises, or officials, either directly or indirectly, in order to obtain or maintain improper business benefits.

In cases where laws, regulations, announcements, rules, local customs, or trade practices permit such actions.

- 4.2 **Fraud** refers to an intentional act to seek undue benefits, in violation of duty or the law, for oneself or others such as family members, relatives, friends, and acquaintances. Corruption includes acts of corruption, embezzlement, and fraudulent reporting, whether directly or indirectly. This also covers payments, assets, or any form of benefits provided either directly by the company or through customers, business partners, or third parties.
- 4.3 **Embezzlement** refers to Any act that leads to the unlawful possession of company assets, or causes the company to lose assets, opportunities, or benefits—whether

directly or indirectly—with the intent to obtain personal or third-party gain, is considered a violation of the company's Anti-Corruption and Anti-Bribery Policy.

- 4.4 **Reporting corruption** refers to Any intentional modification of financial or non-financial reports—such as financial statements, accounting records, or other company reports—with the purpose of concealing asset misappropriation or unethical conduct, or to gain personal or third-party benefit, resulting in inaccurate or misleading company information, is considered a violation of the company's Anti-Corruption and Anti-Bribery Policy.

5. Types of Corrupt Practices Prohibited by the Company

- 5.1 **Political Contribution** refers to the provision of financial or material support, or participation in political activities on behalf of the company—including the encouragement of employees to engage in such activities—with the intent to obtain improper business advantage. Such conduct is strictly prohibited under the company's ethical governance framework. This does not include employees' participation in political activities carried out under their personal rights and freedoms, which are not affiliated with the company.

The company maintains a policy of political neutrality in its business operations. It does not support, affiliate with, or engage with any political party, politician, or professionals associated with political entities. The company shall not allocate financial resources or provide any form of assistance that could be interpreted as political contribution, as defined in the preceding paragraph, with the intent of securing improper business advantage.

- 5.2 **Charitable Contribution** refers to activities involving the allocation of financial resources, assets, or materials to government agencies, state-owned enterprises, healthcare institutions, the Thai Red Cross Society, religious institutions, foundations, and public charities, as well as projects or initiatives that promote community and society benefit. Such contributions are permitted under the company's corporate citizenship framework, provided they are not intended to secure business advantage or improperly influence decision-making processes.
- 5.3 **Sponsorship** refers to activities involving the allocation of financial resources, assets, or other forms of benefit—either provided or received—to reasonably support customers, business partners, communities, or other stakeholders. These activities aim to foster goodwill, strengthen stakeholder relationships, and enhance business, brand, or corporate reputation. Such initiatives are recognized as part of the company's corporate citizenship or community investment efforts and do not

include promotional support governed by commercial contracts or formal business agreements.

- 5.4 **Gift** refers to any item of value—whether monetary or non-monetary—provided by or received from business-related parties or stakeholders, with the intent to foster goodwill or strengthen business relationships. Such items must be of reasonable value and aligned with local customs, cultural traditions, and festivals. These practices are governed under the company’s business ethics and anti-corruption framework.
- 5.5 **Entertainment and Hospitality** refers to expenses incurred for food, beverages, hospitality, and related services provided to or received from business-related parties or stakeholders. These expenditures must be reasonable and intended to foster goodwill, strengthen business relationships, or reflect commercial customs, local traditions, and socially accepted etiquette. This includes customary and appropriate expenses for occasions such as congratulations, expressions of gratitude, welcoming, condolences, or assistance, in alignment with the company’s business ethics and stakeholder engagement principles.
- 5.6 **Expenses for hospitality services** refer to expenditures for food, beverages, hospitality items, and related services provided to or received from stakeholders or business-related parties across both public and private sectors. These expenses must be reasonable and intended to foster goodwill and strengthen professional relationships, in alignment with the company’s business ethics and stakeholder engagement principles.
- 5.7 **Facilitation Payment** refer to informal payments made to public officials solely to ensure or expedite the execution of routine governmental actions, where such actions are non-discretionary and constitute legitimate duties or entitlements under applicable law—such as obtaining permits, certificates, or accessing public services. These payments are considered a violation under the company’s anti-corruption policy and governance standards.
- 5.8 **Revolving Door** refers to this situation, commonly referred to as the “revolving door”, occurs when an individual who is or was a government official, politician, or advisor to a public agency subsequently assumes a role within a private company. Such individuals may leverage personal relationships or insider information to benefit the private entity, potentially resulting in a conflict of interest between the responsibilities of the regulatory body and the interests of the company under its oversight. This practice may be intended to secure an unfair business advantage or to influence policy decisions in favor of the private company employing the former public official.

- 5.9 **State official** refers to political office holders, government officials, or local government employees with permanent positions or salaries; employees or persons working in state enterprises or government agencies; local administrators and members of local councils who are not political office holders; officials under the law governing local administration; including directors, sub-committee members, and employees of government agencies, state enterprises, or other state entities. This also includes persons or groups of persons who exercise or are assigned to exercise administrative powers of the state in carrying out any act under the law, whether established within the government system, state enterprises, or other state undertakings.
- 5.10 **Conflict of Interest** refers to situation or act that creates a conflict of interest 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 in developing and maintaining business relationships with customers, partners, the public sector, and the private sector must be conducted with transparency and integrity, in compliance with relevant regulations, operational procedures—including procurement processes—and applicable laws. Bribery must not be offered or accepted in any business activity of the company.
- 5.12 **Kickbacks** refers to transfer of a sum of money to a public official or private party as unlawful compensation (kickback) for assisting the company in securing a project or contract, where the payment is derived from an overbilling scheme—submitting an inflated project value—and the excess amount is then shared with the individual involved.
- 5.13 **Collusion** refers to Collusion and other similar acts, such as bid rigging, specification locking, using Inside Information to confidential etc.
- 5.14 **Conflict of Interests** refers to nepotism and cronyism such as engaging in exclusive contracting with alliance or affiliated groups including the employment of former government officials such practices reflect a revolving door between government and business, where personal networks and influence are used for private interests.

6. Roles and responsibilities

- 6.1 **Board of Directors** have to be responsible for establishing policies and overseeing the implementation of an effective anti-corruption system, regularly reviewing anti-corruption policies and practices to ensure alignment with the policy, and ensuring that management demonstrates a strong commitment to anti-corruption and embeds it as part of the organizational 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 comply with international standards and are robust, appropriate, and effective.
- 6.3 **Corporate Governance and Risk Management Committee** have to be responsible for overseeing and supporting the implementation of corporate governance and risk management by assessing organizational risks and corruption risks, reviewing governance, risk management, and anti-corruption measures to ensure their adequacy, and reporting to the company's board of directors.
- 6.4 **Executive Committee and Management** have to be responsible for establishing, promoting, and supporting the anti-fraud and anti-corruption policy, ensuring effective communication with company employees and all relevant parties. This includes regularly reviewing the appropriateness of systems and measures to ensure alignment with changes in business operations, laws, company regulations, work rules, announcements, and other applicable measures (if any).
- 6.5 **Internal Audit** have to be responsible for auditing and reviewing operations to ensure compliance with the anti-fraud and anti-corruption policy, delegated authority, operational procedures, laws, and regulatory requirements, to ensure that control systems are appropriate and sufficient to address potential corruption risks, and reporting to the Audit Committee.
- 6.6 **Employees** have to be responsible for perform duties in accordance with the anti-corruption policy and the guidelines under the anti-corruption policy. In case of remains a question or detection of policy violations, a report must be made to the supervisor or through the designated whistleblowing channels.

7. Standard guidelines

- 7.1 Directors, executive officers, and employees must comply with the company's anti-corruption policy and code of conduct and must not be involved in any form of corruption, whether directly or indirectly, for the benefit of oneself, family, relatives, friends, or acquaintances.
- 7.2 Employees of the company must not disregard or overlook if any act that may constitute corruption related to the company must be reported to a supervisor or the person responsible and full cooperation must be given in the investigation of the facts. If there are any questions or concerns, employees should consult with their supervisor or the designated person responsible for monitoring compliance with the

Code of Conduct for directors, executives, and employees through various channels.

- 7.3 The company will ensure fairness and protect employees who refuse or report corruption related to the company. The company implements protection measures for whistleblowers or those who cooperate in reporting fraud and corruption as stipulated by the company. Furthermore, no actions will be taken to demote, punish, or negatively affect employees who refuse corruption. If such actions cause the company to lose business opportunities, the company has established operational processes for each department as guidelines, defining roles and responsibilities, and implementing monitoring and auditing procedures.
- 7.4 The company recognizes the importance of disseminating information, providing education, and raising awareness among relevant persons who are required to perform duties related to, or potentially impacting, the company, to ensure compliance with the anti-fraud and anti-corruption policy.
- 7.5 The company is committed to fostering and maintaining an organizational culture of zero tolerance for corruption in all transactions with both the public and private sectors.
- 7.6 The company shall establish procurement guidelines, covering the code of conduct, procurement agreements, selection of partners in both the public and private sectors, price consideration, approval limits, issuance of purchase orders, receipt and inspection of goods or services, quality control, product returns and credit notes, invoicing, and payment. These processes shall be included in the operational guidelines for procurement activities.
- 7.7 The company oversees and controls transactions with parties having conflicts of interest in accordance with good corporate governance principles and business ethics, as prescribed by the Capital Market Supervisory Board and the Stock Exchange of Thailand.
- 7.8 The company will integrate the anti-fraud and anti-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 employee understanding for application in business activities under their responsibility, and to effectively oversee compliance.
- 7.9 In cases where the company intends to hire a government employee or official, such employment must not create a corruption risk in terms of conflict of interest, lack of impartiality, or undue influence on public policy to benefit the company. The matter must be submitted to the company's board of directors for approval only.

- 7.10 The company has an accounting and record-keeping system that is audit-ready to verify the accuracy and appropriateness of financial transactions, with sufficient and complete supporting documentation at every stage of operation, in compliance with relevant standards, principles, and laws.
- 7.11 The company has established audit systems, internal control systems, and risk management processes to ensure that its operations are robust, sufficient, and capable of anti-corruption.
- 7.12 Directors, executives, and employees of the company who violate or fail to comply with the anti-fraud and anti-corruption policy shall be subject to disciplinary action in accordance with the company's measures and may be subject to civil and criminal liability if the act is unlawful.
- 7.13 The company shall conduct an annual review of the appropriateness of the anti-fraud and 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. It does not engage in political contributions or activities that indicate support for any specific political party.
2. Employees have the legal right to participate in political activities. However, they must not misrepresent their affiliation with the company or use company assets, equipment, or tools for political purposes. Participation must be conducted with caution to avoid any perception that the company is engaged in political contributions or supports any specific political party.
3. In cases where the company intends to engage in political contributions to support democratic governance, such contributions must comply with applicable laws and must not be made with the expectation of preferential treatment. All such activities must be submitted for approval by the company's Board of Directors.

8.2 Donation

The company has a policy to make donations to public charitable foundations or organizations. The company has consistently supported such initiatives, including the Dr. Thiam Chokwatana Foundation, established by the founder of Saha Group. This charitable organization aims to promote public benefit activities and contribute to national development, particularly in areas related to public health and education for children and youth in remote communities.

This is in accordance with the company's donation guidelines.

8.3 Support

The company has a policy to provide support within a reasonable and permissible scope, with appropriate value and in compliance with relevant laws. Support may be provided in various forms Such as supporting educational activities, promoting arts and culture, and sponsoring sports competitions, etc.

8.4 Receptions, receipts and grants of gifts

No receipts or grants of gifts, tokens or receptions which may influence a decision shall be made. If there is giving or receiving gifts, tokens, and hospitality according to customary practices within reasonable limits to maintain good relationships with business stakeholders, conducted appropriately with suitable value and in compliance with customs and relevant laws.

This is in accordance with the guidelines on receiving or giving gifts, tokens, and hospitality.

8.5 Hospitality and Facilitation Expenses

The company has no policy to pay hospitality and facilitation expenses to expedite processes, unless such payments are made in accordance with customary practices.

This is in accordance with the guidelines on the giving or receiving of gifts, gratuities, and hospitality.

8.6 Employment of Government Officials or Public Sector Employees

In cases where the company intends to employ government officials or public sector employees, such employment must not pose a risk of corruption through conflicts of interest, impartiality concerns, or attempts to influence public policy in favor of the company and shall be subject to approval by the company's board of directors only.

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

1. The appointment of former government officials or individuals previously employed by regulatory agencies directly related to the company must be made only after a minimum two-year separation from their former position, prior to assuming roles as company directors, executives, employees, or advisors.
2. The company has a due diligence process to screen individuals being considered for appointment as directors, executives, employees, or advisors, to identify potential conflicts of interest prior to hiring or appointment.
3. The approval of employment and determination of compensation for hiring government officials or public sector employees to hold positions in the company, from executive level downward, must be carefully justified and conducted in accordance with company regulations.

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

In cases where company personnel perform work for government agencies

1. Company personnel may perform policy-related duties for government agencies, provided that the company is notified immediately upon appointment.
2. In cases where company directors, executives, or employees engage in public policy roles, they must perform their duties with caution and diligence, in compliance with legal and ethical standards, to prevent abuse of power or conflicts of interest.
3. Disclosure of company personnel performing duties for government agencies shall be included in the company's annual information disclosure/report (Form 56-1 One Report) to ensure transparency.

8.7 Conflict of Interest

The company maintains governance controls over related party transactions and potential conflicts of interest, in alignment with the principles of good corporate governance and regulatory requirements set forth by the Capital Market Supervisory Board and the Stock Exchange of Thailand.

The following practices shall apply:

1. Not engaging in any business that competes with the company, either directly or indirectly.
2. Avoid entering into transactions with oneself or related individuals/entities that may lead to conflicts of interest with the company.
3. Ensure that the company complies strictly with the rules, procedures, and disclosure requirements for related party transactions as prescribed by law or regulatory authorities, and in accordance with the company's regulations.
4. Stakeholders must not be involved in the consideration of transactions in which they have a conflict of interest.
5. In cases where related party transactions are necessary, such transactions must follow general commercial terms approved by the Board of Directors, conducted with transparency and fairness as if dealing with external parties, and with consideration for the best interests of the company.
6. In cases where related party transactions do not follow general commercial terms as approved by the Board of Directors, or where the nature and size of the transactions exceed

management's approval authority, such transactions 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 prudence, fairness, and reasonableness, through a transparent approval process for entering into transactions.
8. Directors, executives, and employees of the company shall prioritize the collective interest over personal gain and perform their duties for the benefit of the company, in compliance with legal and ethical standards, without granting undue advantage or privileges to any individual.
9. Company directors, executives, or employees shall not make decisions on transactions in which they or related parties have a vested interest.
10. Company directors, executives, or employees shall not seek personal or third-party gain from any information or 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 has established operational procedures related to customer processes, including needs identification, communication, delivery, and customer relationship management.
2. **Partners:** The company has established operational procedures for procurement processes, including quotation submission, partner and contractor selection and evaluation, effective monitoring and control to ensure compliance with contractual obligations. The procedures cover partner selection from both public and private sectors, price evaluation, approval limits, purchase order issuance, receipt and inspection of goods or services, quality verification, returns and credit notes, invoicing, and payment. These are outlined in the company's procurement governance framework.
3. **Public Sector:** The company has established a procedural manual outlining the steps for obtaining business-related licenses from relevant government agencies. This ensures that employees or designated representatives prepare documentation accurately and in compliance with applicable regulations and law.

This is in accordance with the operational procedures for customer-related processes, procurement processes, and the procedural manual for obtaining licenses from relevant public sector agencies.

8.9 Kickbacks / Collusion

The company has no policy of making payments to public or private sector individuals as compensation for securing projects or contracts. This includes practices such as overbilling schemes, where inflated project values are used to generate excess funds for improper payments, as well as collusion, bid rigging, specification manipulation, and the use of confidential insider information. All such activities are strictly prohibited under the company's anti-bribery and corruption framework.

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 contracting with family members, relatives, friends, acquaintances, or affiliated groups unless such actions fully comply with procurement procedures and applicable laws.

8.11 Sales and Marketing

The company prohibits any offers, promises, requests, or demands that may indicate corrupt behavior in all types of business activities. Engagements with customers from both the 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 has a policy on investment and borrowing commitments in accordance with good corporate governance principles. Any increase, decrease, or new investment, as well as borrowing or entering into financial obligations, must be approved through the authorization process defined by 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 has a policy on accounting and finance operations in accordance with good corporate governance principles. It maintains internal control systems and risk management practices, complies with applicable laws, regulations, and standards, and ensures adequate disclosure of material information in financial statement notes and management discussion and analysis. This is to ensure accurate and complete accounting records, safeguard company assets, and prevent fraudulent activities.

This is in accordance with the accounting and finance 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. Direct notification in word or written to the direct supervisor. If it is not considered, the higher-level supervisor or the human resources management and development division manager should receive the notification instead.
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 may facilitate the company's ability to provide progress updates, clarify facts, or address the issue more efficiently.



2. The company will keep confidential the name, address, or any information that could identify the whistleblower or informant. Such information will be restricted to personnel responsible for handling the investigation, unless disclosure is required by law. These practices are in accordance with 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. Disciplinary actions will be taken against individuals who engage in such misconduct.
4. The company will disclose only necessary information, with consideration for the safety and potential harm to the whistleblower or related individuals. Any affected parties will be provided with appropriate and fair remediation processes.
5. The company will disclose only necessary information, with consideration for the safety and potential harm to the whistleblower or related individuals. Any affected parties will be provided with appropriate and fair remediation processes.
6. The company shall not demote, penalize, or impose any adverse consequences on employees who report misconduct, cooperate in fact-finding investigations, or refuse to participate in corrupt practices, 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. The whistleblower or cooperating party may request the company to implement appropriate protection measures. Alternatively, the company may proactively implement such measures without a request if it determines that the situation poses a potential risk of harm, damage, or safety concerns.
9. The company shall not engage in any unfair treatment toward whistleblowers or complainants, including but not limited to changes in job position, job responsibilities, work location, suspension, intimidation, interference with work performance, termination, or any other actions that constitute unfair treatment toward whistleblowers, complainants, or individuals cooperating in fact-finding investigations.

8.16 Employee Protection

The company shall provide care and protection to individuals who comply with the Anti-Corruption Policy and related practices, using whistleblower protection measures as outlined in the Code of Conduct for directors, executives, and employees. The company shall also ensure fairness and protection for employees, who shall not be penalized or demoted for refusing to engage in corrupt or fraudulent activities, even if such refusal results in the loss of business opportunities.

8.17 Human Resource Management

The company has clearly defined operational requirements and practices, including a strict prohibition on soliciting or accepting any form of benefit or compensation from job applicants or related parties during the recruitment and probation evaluation process for employment.

This is in accordance with the procedures and processes related to Human Resource Management and Development.

8.18 Training and Communication

1. The company regularly provides anti-corruption training and awareness through various channels such as orientation programs, seminars, and public notices. These efforts aim to raise awareness of the Anti-Corruption Policy, anti-corruption measures, risks associated with involvement in corrupt practices, the company's expectations, reporting mechanisms for suspected corruption, and the disciplinary actions for violations.
2. The company communicates its Anti-Corruption Policy, related practices, and guidelines to directors, executives, employees, shareholders, customers, business partners, all stakeholder groups, relevant business parties, and business representatives through appropriate channels. The general methods of communication to relevant parties are as follows:
 1. Public Disclosure on the Company Website
 2. Distribution of Brochures or Notices for General Awareness
 3. Internal Communication through the Group's Network, such as via Intranet Bulletins and Email.
 4. Creation of Materials, Items, or Symbols Representing the Anti-Corruption Policy.
 5. Organizing Activities or Campaigns Involving Directors, Executives, Employees, Customers, Business Partners, All Stakeholder Groups, and Relevant Parties, with Embedded Objectives Supporting the Anti-Corruption Policy.

Internal Communication

1. Internal publication of group company policies, Anti-Corruption Policy practices, and related guidelines and documents through internal communication tools.
2. Posting on the Employee Bulletin Board regarding Anti-Corruption Policy updates, practices, and related guidelines to ensure employees are informed of relevant events and aligned with proper conduct.
3. Organizing at least one annual meeting between management and employees to communicate and clarify the Anti-Corruption Policy, related practices and guidelines, address questions regarding implementation, discuss arising issues, and jointly identify appropriate solutions.
4. Establishing an annual training plan or upon changes, including mandatory testing for all employees.

External Communication

1. Including anti-corruption measures as a contractual condition in business agreements between the company and contractors or clients, to ensure that clients and business partners are informed from the commencement of the business relationship. Example clause:
 - In a service contract for performance-based work, a clause should be included stating that company employees or representatives must not solicit or accept any money or assets from employees or representatives of the service provider under the terms of this agreement. If either party discovers such conduct, it shall promptly notify the other party in writing. Both parties reserve the right to terminate the business contract or the performance-based 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 symbols or materials that reflect the Anti-Corruption Policy on items distributed to clients or business partners, such as during festive occasions, business events, or promotional activities.
3. Conducting customer satisfaction surveys that include topics related to transparent operations and the absence of solicitation or acceptance of undue benefits.

4. Preparing letters or documents to inform all clients and business partners of the company's policy regarding the giving/receiving of gifts, gratuities, and entertainment, including hospitality and other forms of benefits, communicated during festive seasons, business occasions, or promotional activities.

8.19 Data Recording and Retention

The company operates in areas related to information in accordance with its corporate policies, with a commitment to maintaining standards concerning operational systems, IT infrastructure, communication systems, and information assets, which are essential foundations for establishing an effective internal control framework. The company undertakes various actions to ensure that information assets, operational systems, and IT infrastructure are protected and remain available at all times for business operations. This includes the design and cost assessment of control measures to ensure they are appropriate to the level of risk associated with the company's data, systems, and IT platforms.

1. Define the responsibilities of users and data custodians across all operational systems and IT infrastructure.
2. Assess and establish risk control systems that are appropriate to the changing 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.

This shall be in accordance with the operational procedures related to record control.

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 compliance with applicable laws and regulations. This includes both periodic disclosures and event-driven disclosures that may affect shareholder rights and interests, as well as other disclosures aligned with the principles of good corporate governance as defined by the Stock Exchange of Thailand, provided such disclosures do 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 through its internal audit unit. The company ensures independence and unrestricted scope for auditors in performing their duties. Additionally, financial audits are conducted by certified public accountants on a quarterly and annual basis, in accordance with the requirements of relevant regulatory bodies.

The Audit Committee reviews the internal control to ensure that business operations are conducted within a proper and lawful scope, in compliance with the company's policies, applicable laws, and regulatory requirements.

Each department is required to establish written operational procedures for processes that pose a corruption risk, to be reviewed and approved by the responsible management or authorized personnel. These procedures must clearly define segregation of duties to ensure transparency, independence, and the ability to prevent or detect fraud risk. All related documentation must be stored in accessible channels for relevant personnel and communicated accordingly. Additionally, department heads should review these procedures annually or whenever there are material changes affecting operations, to ensure alignment with sound internal control principles and current practices.

8.22 Sanctions and disciplinary actions

The company shall impose sanctions and disciplinary actions on directors, executives, and employees who violate, intimidate, harass, or neglect misconduct under the company's anti-corruption policy. Such individuals will be subject to disciplinary measures in accordance with company 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 against those individuals.

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

Lack of awareness of the anti-corruption policy, its procedures, or applicable laws shall not be accepted as a justification for non-compliance.

8.23 Monitoring, review, and audit

The company requires regular monitoring, review, and audit of its anti-corruption policy and related procedures on an annual basis by all responsible parties, in accordance with the defined accountability structure. If there are concerns that any activity or business transaction may violate this policy, applicable laws, or regulatory requirements, 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