

# Anti-Corruption Manual

Energy Absolute Public Co., Ltd.

Approved by the Board of Directors Meeting No. 2/2020 on 14 May 2020.

## Content

Details	Page
Introduction	3
Principle and reason	4
Definition of Anti-Corruption Policy	5-7
Anti-Corruption Policy	8-9
Management structure and responsibilities	10-11
Guidelines for Anti-Corruption Policy	12-14
Terms of action	15
Gifts, complimentary or any other benefits	15-17
Giving or receiving trade discounts	18
Political Contribution Policy	18
Charitable donations	19-20
Subsidy	21-22
The Company and related person to companies	23
Borrowing and lending contingencies	23
General procurement	23-24
Human Resources Management	24
Accounting and Financial Controls	24-26
Risk management	26
Complaints / Whistleblowing	26-27
Disclosure	27
Communication	27-28
Audit process and internal control	28
Recording and preserving information and documents	29
Monitoring and Review	29
Penalties	30

## Introduction

Energy Absolute Public Company Limited (the “Company”) realizes the importance of ethics, morality and transparency in business operations including social responsibility, environment and all stakeholders. In accordance with the principles of good corporate governance, the Company focus on compliance with the rules, regulations, and laws relating to anti-corruption as well as campaigning and instilling anti-corruption values within the Company, to ensure that its personnel have understanding and conscience, including a commitment to anti-corruption in all forms.

To ensure that the Company has an appropriate risk management system sufficient for all forms of anti-corruption, the Company has established an anti-corruption policy, determining the accountability, the appropriate practices and procedures to prevent corruption that may occur in the Company’s operations. To ensure that the potential corruption risks related to the Company’s operations are considered and treated appropriately, adequately and carefully, the Company has established the anti-corruption guidelines in writing, and explaining and making understanding together with communicating the aforesaid guidelines, e.g. the Board of Directors, the Executive Committee, any sub-committees and employee at all levels of the Company and its affiliates. In this connection, this is to be regarded as clear guidelines for anti-corruption in all forms that may occur in the Company’s operations.

The Board of Directors, therefore, requested the Executive Committee, any sub-committees including employees of the Company and its affiliates to study and understand the anti-corruption practice and strictly adhere thereto. In this regard, the Company considers this anti-corruption practice to be a part of the “Work Rule” of the Company.

Mr. Somchainuk Engtrakul  
Chairman of the Board of Directors

Mr. Somphote Ahunai  
Chief Executive Officer

#### Principle and reason

The Board of Directors recognized the importance of the Sustainability Development Roadmap (SD Roadmap) of the companies listed by the Securities and Exchange Commission (SEC). The Company strongly believes that it will enable the Company to grow sustainably with all stakeholders. The Sustainability Plan comprises of:

- 1) CG in Substance: Creating a sustainable and reliable performance with a strong emphasis on practice.
- 2) CSR in Process: The Company's daily business operations are under social and environmental responsibility.
- 3) Anti-Corruption in Practice: To be the Company that has serious practices and creates a culture of anti-corruption in all its forms.

To achieve the above-mentioned sustainability plan, the Company, therefore, determined the anti-corruption policy and responsibilities, and appropriate practices and requirements to prevent corruption that may occur in the Company's operations and the potential risks. Corruption risks in the Company's operations are considered and acted on appropriately, adequately and carefully. Therefore, the Company has created a written "Anti-Corruption Manual" to provide clear guidelines on the Company's operations and to develop into a sustainable organization.

#### Definition according to Anti-corruption Policy

Dishonest actions	refers	misconducted exploitation by position, duties or laws of directors, executives and employees including the Company, customers, trade partners, the Company's parties or any other persons directly or indirectly involved in the Company's business operations, such as counterfeiting or wrong alteration of documentary evidence, making false evidence, using the Company's assets for personal gain, misappropriation, embezzlement, fraud, and any other acts in a manner that is contrary to benefits, etc.
Corruption	refers	Bribery in any form by offering to promise to make a pledge, any claim or receipt of money, property or any other benefits which are inappropriate or unlawful to government officials, government authorities, private sector or any person either directly or indirectly, in order such persons to act or refrain from performing their duties which cause the acquisition or treatment of improper interests of the Company's business, unless otherwise required by law, regulations, announcements, articles, local customs or commercial customs to be done.
Fraudulent payments or fraudulent benefit payments	refers	Payment or any assets or benefits from the Company's directors, executives and employees either directly or indirectly through customer/trade partner or third parties.
The Company	refers	Energy Absolute Public Company Limited
Trader Partner Company	refers	Juristic persons or natural persons related to the Company's business
Affiliates	refers	Juristic persons controlled by Energy Absolute Public Company Limited
Board of Directors and Sub-Committees	refers	<ol style="list-style-type: none"> <li>1) Board of Directors of Energy Absolute Public Company Limited</li> <li>2) Executive Committee</li> <li>3) Audit Committee</li> <li>4) Nomination and Remuneration Committee</li> <li>5) Risk Management Committee</li> <li>6) Corporate Governance and Sustainability Committee</li> </ol>

Executives	refer	manager or the first four top-ranking executives after the manager level as well as other 4th ranking equivalent and includes accounting or finance executives of department head level and up. This is under the announcement of the Securities and Exchange Commission.
Employees	refers	directors, executives and employees at all levels of Energy Absolute Public Company Limited
Stakeholder Group	refers	shareholders, investors, joint ventures, business partners, customers, trader partners, creditors, trade competitors, government authorities and private sectors, employees, communities, society and the environment.
Disclosure of information	refers	disclosure of information relating to the Company's business operations under the Public Company Limited Act, B.E. 2535, Securities Act, B.E. 2551 (2008), rules, regulations of the Stock Exchange of Thailand and the Securities and Exchange Commission of Thailand
Conflicts of Interest	refers	any circumstances, events or actions taken by the directors, executives and employees, including individuals associated with these individuals, whether by blood or any other means which have personal interests affect their decisions or duties in the positions they are responsible for and are contrary to the Company's collective interests. Such situations, events, or actions may cause these individuals to lack the fairness to make transparency decisions.
Returns or other benefits	refers	Giving items in the form of assets or returns, either in money or not, such as special privileges or any other benefits to any person as a reward or a liability or to build good relations with them.
Bribery	refers	Offering property, rewards, gifts or any other benefits to any person so that the person may act or abstain or omit from any actions in their duty, whether the action or abstaining from or omission is legally or unlawfully by the position. In this connection, it is required to convince or motivating the person to act or abstain or omit from certain acts dishonestly. contrary to the law or breach of ethics or business ethics, either directly or indirectly.

Gifts, complimentary or any other benefits	refers	any valued stuff which can be priced as money or psychological value given to any person on important occasions according to traditions or cultures, or manners practised in society or under local traditions, with good hospitality such as New Year's gifts, birthday gifts, gifts for new positions, etc., or as rewards including the provision of special benefits such as the privilege of receiving services, entertainment, recreation as well as travel expenses or hospitality, travel, accommodation, meals or any similar items.
Subsidy	refers	grants or contributions or subsidies or in similar manners paid to or received by any person, both government sectors and private sectors to support the Company's business operations or the Company's reputation which is useful for building business credibility, creating business relations, etc.
Custom	refers	what socialism practices have inherited is a tradition or tradition or tradition.

## Anti-Corruption Policy

The Company has set out its vision to be a leader in alternative energy business by using modern, environmentally friendly technology for the best interests of users, shareholders, trader partners and employees fairly, with importance in compliance with relevant laws and good corporate governance under the management framework with a code of conduct concerning all stakeholders and transparency in particular of the Company's operation or corruption risks either directly and indirectly. The Company, therefore, has set up the following anti-corruption policy:

1. Directors, executives, employees, stakeholders of the Company and its affiliates are prohibited to operate or accept corruption in any form, directly or indirectly, for their own, family, friends and acquaintances. It covers all businesses in all countries and agencies involved and regularly monitors the compliance with this anti-corruption policy including reviews its practices and procedures to comply with changes in business, regulations, rules and requirements of the law

2. The Company has established anti-corruption measures which are as part of the Company's business operations and are the responsibility of all parties, i.e., the Company's directors, executives, employees and its affiliates including stakeholders. They will participate in comments on various practices to achieve the Company's anti-corruption actions under the determined policies.

3. The Company is required to continuously improve and develop anti-corruption measures in accordance with the guidelines, regulations, rules and the applicable laws, including code of conduct and good corporate governance by providing the assessment of the potential risks of fraud in the Company's business operations and establishes good internally controlled practices to prevent corruption in all forms from occurring in the Company's business operations.

4. The Company shall not give or accept bribes or support the giving or receiving of bribes in any form, including supervision and control of donations in charitable donations, donations to political parties, giving or receiving gifts, giving or receiving grants, as well as any returns or benefits. In this regard, to ensure transparency, it does not motivate or incentivize the individuals involved in the Company's directors, executives, employees and its affiliates, as well as a stakeholder group in both private sectors and government sectors to perform improper actions.

5. The Company shall provide a good, appropriate and adequate internal control system to prevent corruption in all forms.

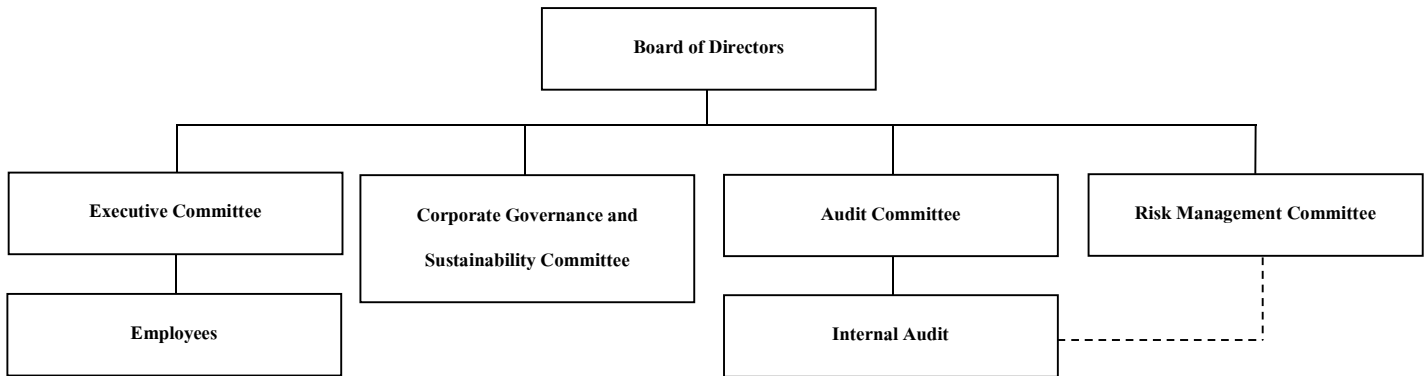


6. The Company shall convey the Company's commitment in all forms of prevention and anti-corruption, as well as promoting the education of prevention and anti-corruption to directors, executives and employees, to instill good conscience and to ensure that all employees of the Company are aware of their duties and responsibilities in performing their duties together against corruption in all forms.

7. The Company shall provide a transparent, accurate and reliable financial reporting mechanism.

8. The Company shall promote good and diverse communication channels to receive whistleblowers from directors, executives, employees and all stakeholders. There is a guarantee that whistleblowers will be protected without being unfairly punished or bullied, including the appointment of persons or a group of persons to investigate and closely monitor all informed corruption leads.

## Anti-Corruption Management Structure



### Duties and Responsibilities

#### 1. Board of Directors

The Board of Directors has duties and responsibility to set policies and supervision for the Company to provide an effective anti-corruption support system and ensure that the management recognizes and values the anti-corruption and instill it as a corporate culture.

#### 2. Corporate Governance and Sustainability Committee

The Corporate Governance and Sustainability Committee is responsible for formulating policies, criteria and guidelines in accordance with good corporate governance principles for directors, executives and employees at all levels to adhere to operational practices as well as supporting the creation of a good corporate governance culture within the organization.

#### 3. Audit Committee

The Audit Committee is responsible for supervising the Company with internal audit system, internal control system, financial and accounting reporting system, and follow-up system and to comply with regulations, rules and applicable laws linked to the potential corruption risks including whistleblowing, the Company's offences and corruption. In this connection, the Company's operations are to ensure that it complies with the international standards, Conciseness, proper, effective and able to prevent all forms of corruption.

#### 4. Risk Management Committee

The Risk Management Committee is responsible for supervising and supporting the implementation of corruption risk management by assessing corruption risks and reviewing anti-corruption measures appropriately.

#### 5. Executive Committee

The Executive Committee is responsible for ensuring that there is a system for promoting and supporting anti-corruption policies to communicate to all employees and stakeholders, as well as to review the appropriateness of procedures and measures to comply with the changes in business, regulations, rules and requirements of the law.

#### 6. Internal Audit Department

The Internal Audit Department is responsible for conducting internal audits, assessing the appropriateness and the adequacy of an internal control system and reviewing the Company's operations as accurately as the policy, guidelines, authority of action, regulations, laws and requirements of compliance authorities. In this regard, the Company is to ensure its internal control system that is appropriate and sufficient to prevent the potential corruption risks and report the performance to the Audit Committee closely and regularly.

#### 7. Employees

Employees have a duty and responsibility to perform their duties in accordance with this anti-corruption policy. In case of suspicion or witness to a breach of this policy, it must be reported through the reporting channels set out in accordance with the Company's whistleblowing Policy.

## Guidelines for Anti-Corruption Policy

Directors, executives, employees at all levels, stakeholder groups and affiliates are required to comply with this anti-corruption policy as well as code of conduct, corporate governance, policies and guidelines for treating various stakeholders groups, as well as regulations and the Company's work rules and/or any other practices that the Company will establish further, without being involved in corruption, either directly or indirectly.

1. The Company is committed to creating and maintaining a corporate culture as well as raising awareness that people in the organization are conscious that corruption is unacceptable for the Company no matter what form of corruption it is.
2. There is no circumstance that implies giving or accepting bribes or bribes to stakeholders directly or indirectly in connection with their duties and responsibilities in order to obtain undue interests, either in the interests of the Company or personal interests.
  - 2.1 Do not accept or give gifts, souvenirs or any similar items to any person concerned with their duties, responsibilities and operations in both government sectors and private sectors.
  - 2.2 Do not accept property, items, gifts, complimentary or any other benefits which are motivating or inducing abstaining or refraining from performing their duties. However, in case of need to receive any assets, items, gifts, complimentary or benefits, please ensure that the said actions are in line with the Company's regulations and/or policies as well as related laws. In this regard, property, items, gifts, complimentary or any other benefits giving to each other on the position should not be priced expensive and appropriately on each occasion.
  - 2.3 Do not provide property, items, gifts, complimentary or any other benefits which are motivating or inducing decision-making or resulting in the recipient not complying with trade practices as if they were treating other trade partners. In this regard, giving items on occasions or agendas must not be exceeded than the normal value and be appropriate for each occasion.
  - 2.4 Not being an agent or involved in any way in offering money, properties, items or any other benefits to a person related to the Company's business operations in both government sectors and private sectors in exchange for any privileges that are undue or unlawful or cause government officials to refrain or omit from performing their duties according to rules, regulations and the legal guideline as stipulated.

3. For business operations and procurement with government agencies, bribes are prohibited in all forms and must be carried out correctly. Please be aware of the rules, regulations, guidelines or customs in each local area or country may have different conditions, procedures or guidelines. Therefore, contacting the government agencies is required to be transparent, honest and comply with the relevant laws.
4. For procurement whether it is done with government sectors or private sectors, such actions must proceed in line with the Company's regulations with transparency and accountability.
5. Payment for business entertainment can be done, however, it must be reasonable, transparent and accountable and comply with the code of conduct.
6. Charitable donations must be as follows:
  - 6.1 The use of funds or any other assets of the Company, charitable donations must be carried out on behalf of the Company only and must be a foundation, charitable organizations, hospitals, clinics, temples or organizations for the benefit of society with certificates or trustworthy can be verified. This must be done through the Company's regulations.
  - 6.2 Charitable donations on behalf of an individual name can only be made, however, it must not be suspected of fraud or for any undying benefits.
7. The use of money or assets of the Company to support the Company's projects must be only named on behalf of the Company for the objective of creating a good image or the Company's reputation. In this regard, disbursements must specify a clear objective with transparency and can be verified and implemented through the Company's regulations.
8. No political involvement. The Company will adhere to political neutrality, support and adhere to compliance with the law under democracy and there is no policy to provide political assistance to any political party either directly or indirectly.
9. Directors, executives and employees of the Company and its affiliates are required to notify the responsible parties immediately and cooperate in investigating the facts without neglecting or ignoring any actions that constitute corruption. In this regard, should there be any questions, kindly consult with the advisor who is responsible for, through the specified channels.

10. The Company shall provide fairness and protection to its personnel who refuse or report corruption. This is in accordance with the protection of whistleblower or complainant and whistleblowing policy. Misconducting and corruption policy without taking any unfair action against whistleblowers, such as demoting, penalties or giving negative consequences to employees who refuse corruption, etc. Even if this causes the Company will lose its benefits or business opportunities.
11. The Company considers corruption committed by the Company's directors, executives, employees and its affiliates are against the Company's ethics and regulations, which shall be subject to disciplinary proceedings in accordance with the regulations prescribed by the Company, including legal penalties.
12. The Company recognizes and values the dissemination. Knowledge and understanding of the Company's anti-corruption policy, including internal personnel and third parties involved in the Company's business operations.

#### Term of Actions

1. This anti-corruption policy covers the human resource management process, from recruitment or selection, promotion, training, employee performance evaluation, and compensation. It requires supervisors at all levels to communicate and understand with employees for responsible business activities and to effectively supervise their practices.
2. Any action under this anti-corruption policy shall be in accordance with the guidelines set out in the regulations, code of conduct, corporate governance, policies and guidelines for various stakeholders, including the Company's regulations and work rule, as well as any other practices that the Company will further establish.
3. To ensure clarity on high-risk corruption issues, the Company's directors, executives, employees and its affiliates are required to comply with caution in the matters prescribed. as follows:

#### Gifts, complimentary or any other benefits

The Company recognizes that the Company will grow sustainably, not only good performance but also the Company shall take into account all stakeholders, including social and environmental responsibility. Although the Company's strategy of building a good relationship with its business partners which brings opportunities for continued success. However, giving or receiving gifts, complimentary or any other benefits to or from any person can be done, if all of the following conditions are in place:

1. Giving or receiving gifts, complimentary or any other benefits must not be contrary to the law and shall be provided on behalf of the Company only.
2. Not in cash or any similar items, such as gift cards or vouchers, etc.
3. It is traditionally and appropriate for situations such as giving or receiving gifts, complimentary or any other benefits during traditional festivals as deemed as a normal practice.
4. The type and value of gifts, complimentary or any other benefits must be appropriate in accordance with the Company's policy and provided by occasions, such as not giving or receiving gifts, complimentary or any other benefits during the Company deal with or trade with government sectors and private sectors, etc.

For business receptions or other similar items, this can be done. This must be reasonable, transparent, accountable. The procedures are carried out in accordance with the Company's regulations.

5. Giving or accepting will be disclosed. No concealment, motivating intention, inducement, obsession or reward any person for gaining business advantages or interests or to obtain any assistance from such person.
6. Do not provide bribery to government officials and or corruption between private sectors.

Procedure for giving or receiving gifts, complimentary or any other benefits

Giving gifts, complimentary or any other benefits

1. The requester determines the suitability of the gifts, complimentary or any other benefits, and the value of the said shall not exceed THB 3,000 per person per occasion.
2. The requester prepares a form of "Gift, Complimentary Request Form" to the supervisor for consideration and proposes the authorized person to approve the transaction under the Company's Delegate of Authority per the procedures for cash advances. The following information must be specified in the application form:
  - Purpose/Reason
  - Recipient details of gift, complimentary or any other benefits
  - The relation between the recipient and the Company as well as the Company's personnel.
  - Credit limit (per the Company's policy), etc.
3. When the application is approved, the requester coordinates with the finance department to disbursement of cash advances according to the procedures and procedures for cash advances.
4. The Finance Department reviews the application, which includes validating the approval of the transaction. If it is accurate, the Finance Department will record payments and print out the payment vouchers from the system and makes payments to the requester per the procedures for payments (pay in cheques or transfer funds to an account, which is required the approval of the authorized person).



5. The Finance Department is responsible for tracking cash advance clearance, recording the clearance of cash advance in the system, collecting the relevant documents and providing the said to the accounting Department to review the accuracy together with recoding the accounting entries.
6. The Accounting Department reviews the accuracy and completeness of cash advance evidence, record the transactions in the accounting system, and file documents for accounting documents so that they can be searched and verified.

#### Receiving gifts, complimentary or any other benefits

1. The Company's Directors, executives, employees who accept gifts, complimentary or any other benefits (recipients) must consider the appropriate whether the receipt of gifts, complimentary or any other benefits is under the Company's policy.
2. The recipient is required to prepare a "Gift, Complimentary Receipt Form" and deliver the form along with gifts, complimentary or any other benefits to the supervisor to review the suitability and the compliance with the Company's policies. Thereafter the form shall be submitted together with the gift, complimentary or any other benefits to the Administration Department for review and control records in the book, "Report on the receipt of gifts, complimentary" and bring that gifts, complimentary or any other benefits use for the best interests of the Company.

#### Practice Guidelines

1. Gifts, complimentary or any other benefits shall not be cash, gift cards or vouchers, cheques, gold, gems or any similar items.
2. Before giving or receiving gifts, complimentary or any other benefits, it is recommended such giving or receiving is not contrary to the law and the Company's regulations or policies.
3. Documentary evidence supporting the payment of gifts, complimentary or any other benefits should be properly kept for inspection.

#### Giving or receiving trade discounts

Giving or receiving trade discounts must be in accordance with the principles of normal business practices in general and shall not have improper purposes.

#### Political Contribution Policy

Political assistance means providing support in any form such as property, money, items and/or participating in or supporting the Company's direct activities or by encouraging its personnel to participate in political activities on behalf of the Company, for the Company to acquire business advantages or commercial interests. Except the Company's personnel participate in political activities in private according to the freedom right per democracy and the Company has not related to actions in its name.

The Company has the policy to conduct business under the relevant laws and recognizes the importance of ethics, morality and transparency in business operations as well as social responsibility. environment and all stakeholders per good corporate governance. Therefore, the Company will not support any political activities of any political parties either directly or indirectly, including non-assistance to candidates for political elections. The Company will be strictly politically neutral. Therefore, the Company has set out its political assistance practices as follows:

1. Under democracy, the Company's directors, executives and employees and its affiliates shall have the right to political freedom and be able to participate in or support political activities. If participation or support for political activity is conducted in a personal name, and does not contravene the Company's regulations and not on behalf of the Company, as well as not use the Company's assets to support political activities, either directly or indirectly.
2. The Company does not allow political parties to use its resources and locations to organize political activities.
3. The Company's directors, executives and employees and its affiliates are prohibited to hold directors in political parties or being representative of political parties in any public activities which may mislead the public that the Company has involved in or support that political party.
4. The Company's directors, executives and employees and its affiliates are prohibited to use their authority to motivate, guide, solicit, pressure or compel any personnel of the Company to support political activities either directly or indirectly.

## Charitable Donations

Although charitable donations are one of the methods taken to comply with the Sustainability Development Roadmap (SD Roadmap) plan which the Company must conduct its daily business under social and environmental responsibility. However, it will be a channel for the Company to have vulnerable corruption risk due to it is characterized as spending money for the public and social benefits without business returns. To prevent corruption from giving to charity, the Company sets out the policies and guidelines regarding charitable donations, reviewing processes and control details as follows:

1. Charitable donations must be made in accordance with the actual charitable project and must be donated to government clinics, government educational institutions, charitable organizations according to the Announcement of the Ministry of Finance or organizations for the benefit of society with certificates, credibility, accountability, and proceed per the Company's regulations.
2. Charitable donations must prove that they are intended to be charitable, transparent, verifiable, and have no hidden benefits or benefits in return for any person unless such benefits are traditionally declared, such as the announcement of the Company's name or logo, at the venue or on the website of the donor organization or any other media in the same way as for public relations purposes, etc.

### Procedure for Charitable Donations

1. The requester considers the appropriateness of charitable donations in accordance with the Company's policy.
2. The requester prepares a form of "Charitable Donation/Subsidy Request Form" to the supervisor for consideration and proposes the authorized person to approve the transaction. The following information must be specified in the application form:
  - Project name
  - The project's purpose/Reason
  - Recipient details
  - Project's details
  - The relation between the recipient and the Company as well as the Company's personnel.
  - The value of the requested donation, etc.
3. Once the application has been approved by the authorized person, it will be sent to the Finance Department for disbursement as approved. The Finance Department reviews the application form,

which includes validating the approval of the transaction. If it is accurate, the Finance Department records payments and print out the payment vouchers from the system and pays the requester per guideline and procedures for making payments (pay in cheques or transfer funds to an account, which must be approved by the payment authority). This identifies the recipient only as of the name of the donor.

4. Once the charitable donation program has been completed, the responsible person for charitable donation will gather documentary evidence related to the Project, such as evidence of donations, photos of charitable donation projects, etc., and deliver it to the Finance Department.
5. The Finance Department is responsible for monitoring, reviewing, and gathering relevant documents to the Accounting Department to review the accuracy and record the accounting entries consequently.
6. The Accounting Department reviews the accuracy and completeness of the evidence, records transactions in the accounting system and files documents for accounting documents so that they can be searched and verified.

#### Practice Guidelines

1. Before donating, please make sure that such donations are not contrary to the laws and the Company's regulations or policies.
2. Donation agencies must be government healthcare facilities. Government institutions, charitable organizations, according to the Announcement of the Ministry of Finance or organizations for the benefit of society with certificates, credibility and no connected transaction characteristics.
3. Having accurate and completed documents, such as project photo details, receipts, etc.
4. The documentary evidence related to donation must be properly kept for inspection.

## Subsidy

Due to the funding is intended to support the Company's business operations or the Company's reputation as a benefit to building business credibility, this is another channel of public relations of the Company and is different from charitable donations intended for the public and social benefits without business returns. However, funding will be one of the ways for the Company to have vulnerable corruption risks, especially bribery risks. Therefore, the Company sets policies and guidelines regarding subsidy, reviewing process and control details are as follows:

1. Projects related to funding must have existed in accordance with business traditions, transparent, accountable and intended to support the Company's business operations as well as comply with ethical, moral and transparency principles in business operations. It should have social responsibility, environment and all stakeholders in accordance with good corporate governance principles.
2. Subsidy must be able to be calculated as a clear amount of money, such as project subsidy, food and accommodation support costs, travelling support cost, etc. The subsidy shall not have any hidden benefits or benefits in return for any person unless such benefits are customary, such as the announcement of the Company's name or logo at the venue or on the website of the recipient of the subsidy or any other media in the same way for public relations purposes.

### Procedure for subsidy

1. The requester considers the suitability of the subsidy. This must be in accordance with the Company's policy.
2. The requester prepares a form of "Charitable Donation/Subsidy Request Form" to the supervisor for consideration and proposes the authorized person to approve the transaction per frame of the approval authorization in the system. The following information must be specified in the application form:
  - Project Name
  - Project purpose/reason
  - Subsidy recipient details
  - Project Details
  - The relation between the recipient of subsidy and the Company and the Company's personnel.
  - Requested amount of subsidy, etc.

3. Once the application has been approved by the authorized person, it will be sent to the Finance Department for disbursement as approved. The Finance Department reviews the application form, which includes validating the approval of the transaction. If it is accurate, the Finance Department records payments and print out the payment vouchers from the system and pays the requestor per guidelines and procedures for making payments (pay in cheques or transfer funds to an account, which must be approved by the payment authority). This identifies the payee only as of the subsidy recipient's name.
4. Once the subsidy program has been completed, the responsible person for the subsidy will gather documentary evidence related to the Project, such as evidence of receiving the subsidy, photos of subsidy projects, etc., and deliver it to the Finance Department.
5. The Finance Department is responsible for monitoring, reviewing, and gathering relevant documents to the Accounting Department to review the accuracy and record the accounting entries consequently.
6. The Accounting Department reviews the accuracy and completeness of the evidence, records transactions in the accounting system and files documents for accounting documents so that they can be searched and verified.

#### Practice Guidelines

1. Before providing subsidies, please make sure that such subsidies are not contrary to the laws and the Company's regulations or policies.
2. The subsidy shall not be like a conflict of interest and not cause personal or affiliation benefits or induces to make any decision unfair in the performance of duties that may be deemed to be as bribery.
3. The documentary evidence related to subsidy must be properly kept for inspection.

## The Company and Persons related to business

Persons related to business refers to the Company, its directors, executives, employees, stakeholders and affiliates, both juristic persons and natural persons in government and private sectors which will strive to conduct business with integrity, fairness, transparency and accountability.

## Borrowing, Lending and Establishing obligation

The Company has established the borrowing, lending and establishing obligation between the Company and other persons, be under the Company's business authority and accordance with the framework of connected transactions approved by the Board of Directors. The benefits or interest should be appropriate in accordance with the Company's policy.

The Company has no policy to call or receive or offer or provide financial or other benefits to any person or entity in order to obtain a loan agreement or loan or to establish/disposal unlawful or ethical obligations of the Company.

## General Procurement

The Company has clear and written procurement procedures and guidelines under ISO 9001. There is a process for approving purchases and orders in accordance with the Company's authorized framework. Transparent and verifiable vendor/service provider pricing is compared as well as evaluating vendors/services providers regularly.

The Company has no policy to call or receive or offer or provide any money or benefits from vendors or service providers in exchange for procurement approvals, which may result in the Company receiving goods, property, services or anything else from procurement that is not of quality or non-standard, or does not meet the order or agreement and may affect the quality of the Company's products and services. In the event that calls or receive or offer or provide any money or benefits is found, the witness shall notify the supervisor immediately and find a way to prevent the incident from occurring or find a solution to mitigate any damages to the Company and its potential counterparties.

### Practice Guidelines

1. The Company's procurement is required to comply with the specified procurement procedures and guidelines. The approval process is under the regulatory framework and transparent price comparison can be reviewed, as well as according to the Company's policies and regulations including the relevant laws such as the acquisition or disposition of assets.
2. The procurement with connected parties must be transparent, verifiable and in accordance with the Company's policies and regulations, as well as relevant laws such as "connected transactions", while that transaction must be on an arm's length basis.
3. Do not use procurement information for personal gain or any other person who is not involved.

### Human Resources Management

The Company has clear and written human resources procedures and guidelines under ISO 9001. It starts with manpower planning, job descriptions, recruitment and background checks, probation, the orientation of new employees, preparation of training plans and training to develop the potential of personnel, evaluation of performance, determining the investigation of offences against the Company's regulations or policies and the applicable laws as well as imposition a clear penalty when such offences are found.

The Company has no policy for any person of the Company to call or receive cash or any other benefits from the applicant or any persons involved in the application process for the application process, the interview, the decisions to accept for work commencement, evaluation during probation, evaluation including any other cases during that person maintains their employment with the Company.

### Accounting and Financial Controls

#### 1.Accounting control

- 1.1 The Company separates the Accounting Department from the Finance Department so that the work of these two departments is balanced and can be monitored against each other. (Check and Balance)
- 1.2 Accounting Department is responsible for recording receivable accounts, payable accounts and other related transactions to be in accordance with professional standards, rules, regulations and



relevant laws. The Accounting Department must ensure that the transactions recorded are in connection with the Company's business operations and consistent with relevant documents such as contracts or invoices. If the transaction submitted to record the account does not contain any supporting evidence documents or that documents are inaccurate or incomplete, or there is any suspicion that there may be a case of corruption, it should report the whistleblowing to the channels prescribed by the Company. This is in accordance with the whistleblowing policy, misconduct and corruption.

- 1.3 The Accounting Department must properly maintain documents related to the accounting records and be ready to review them at all times.

## 2. Financial Control

- 2.1 The Company separates the Accounting Department from the Finance Department so that the work of these two departments is balanced and can be monitored against each other. (Check and Balance)

- 2.2 The Finance Department is responsible for receiving and paying money. The Finance Department must review to ensure that the supporting evidence documents attached to receiving and paying are related to the Company's business operations in accordance with the related evidence documents, such as receipts, etc. If the transaction submitted for receipt of payment is found to be without supporting evidence document(s) or the evidence document(s) is inaccurate or incomplete, or there is any doubt that this may be the case of corruption, it should report the whistleblowing to the channels prescribed by the Company. This is in accordance with the whistleblowing policy, misconduct and corruption.

- 2.3 Receiving and paying must be made only through the bank account designated by the Company. Payments must be approved by the authorized person related to the payment according to the Company's authorized framework at all times. Cash receipts and payments are required to have proper control and the supporting evidence documents are correctly, completely, review and follow up by the Finance Department.

- 2.4 The Finance Department shall process the billing or receiving the bill according to the trade conditions agreed by the Company and the customers or its partners. The process shall not delay or expedite the billing or receipt of bills for no reasonable reason or to call or receive any benefits from customers or partners who may be subject to corruption.

2.5 Supporting evidence documents for receiving and paying are required to be submitted to the Accounting Department for reviewing the accuracy and completeness of the accounting record. The said documents shall be provided for the accounting record.

#### Risk Management

The Company shall provide risk management that covers corruption risks and regularly review the risks and the existing risk management measures to help prevent risks from being at an acceptable level.

#### Complaints / Whistleblowing

To promote anti-corruption operations, the Company has set up a whistleblowing policy for misconduct and corruption as a guideline for consideration and practice to receive complaints of misconduct and corruption both inside and outside the organization.

#### Complaints / Whistleblowing Policy

To encourage internal and external stakeholders which participates in corporate governance, processes, the Company, therefore, sets policies in case that the stakeholders have doubts or witness any acts suspected of breaching or complying with the laws; rules, regulations or code of conduct or any suspected corruption. It can report whistleblowing or complaint and send details of the evidence to the Chairman of the Audit Committee of the Company.

#### Channel for Complaints / Whistleblowing

The shareholders, directors, executives, employees and all stakeholders can report whistleblowing in case of doubt or witness any acts suspected of breaching or complying with the law, rules, regulations, or code of conduct or events that may cause damage(s) to the Company, to the Chairman of the Audit Committee by mailing at the address below or report via the Company's website at [chairman.audit.com@energyabsolute.co.th](mailto:chairman.audit.com@energyabsolute.co.th). The Company will keep such information confidential so that whistleblowers do not suffer. The whistleblowing channels are as follows:

Chairman of the Audit Committee  
Energy Absolute Public Company Limited  
16th Floor, 89 AIA Capital Center Building, Ratchadaphisek Road  
Din Daeng Sub-district, Din Daeng District, Bangkok 10400

#### Conditions and considerations for receiving complaints/whistleblowing

- 1) The details of the complaint must be true, clear and sufficient information to lead the investigation process.
- 2) The complainant can choose not to disclose herself/himself, to protect the complainant.
- 3) The information received by the Chairman of the Audit Committee shall be confidential and disclosed as necessary, taking into account the safety of the complainant.
- 4) Complaints that have been scrutinized and investigated will be reported to the Board of Directors for further consideration and appropriate measures.
- 5) The complainant will be protected from both employees and third parties.

#### Guidelines

1. Informing on the progress and a decision of the complaints to the complainant which disclose their name, address and contact.
2. The Company reserves the right not to disclose detailed information regarding investigations or disciplinary actions that affect personal information and confidentiality.

#### Disclosure

The Company discloses the necessary information to its directors. Executives, employees, stakeholders, affiliates, and related parties are accurate, complete, timely, transparent and up-to-date through easy access channels. It is equal and reliable. This anti-corruption policy is disclosed in the annual report and other convenient access to information such as the Company's website or other methods as appropriate.

#### Communication

##### 1. Internal Communication

The Company will communicate anti-corruption policies within the Company, such as the Company's directors, executives and employees at all levels and its affiliates according to the communication channels within the Company via email, the Company's website, print media, public relations announcements, both in a new employee orientation session and annual training session, etc. This is to communicate the anti-corruption policy to

reach the Company's employees at all levels to raise awareness and recognize the importance of anti-corruption which has become a corporate culture.

## 2. Internal Communication

The Company will communicate its anti-corruption policy to third parties as a letter of intent against the corruption in all forms, such as customers, partners, trading partners as well as other parties involved in the Company's business operations. Once the Company deals a commercial business with those individuals. The Company's anti-corruption policy will regularly communicate at least once a year

In addition, the Company has organized the communications with anti-corruption policies to third parties through other communication channels such as the Company's website and in the form of the annual registration statement, including the Company's public relations board, etc.

## Audit process and internal control

The Company supports and provides an effective internal audit process with independent internal audit authority which directly report to the Audit Committee. The Company has granted independence and no limits on the performance of internal auditors. The internal audit is responsible for assessing the appropriateness and adequacy of the internal control system of the Company, conducting compliance to internal control systems, providing feedback and solutions to improve or develop internal control more efficiently and effectively. It can prevent and detect potential risks and cover reviewing the implementation of anti-corruption procedures as well as offering straightforward audit reports when defects of materiality are detected to the Audit Committee.

In addition, the Company is audited by the certified auditors quarterly and annually as required by the Securities and Exchange Commission, Department of Business Development and other relevant regulatory authorities.

The Audit Committee is responsible for overseeing the internal audit process, internal control system, preparation of financial reports, compliance with rules, regulations and applicable laws. This ensures that the Company's operations are efficient and effective, concise, suitable. The Company's financial reports comply with the certified accounting standards and regularly report substantial audit results to the Board of Directors.

## Recording and preserving information and documents

The Company is committed to maintaining the standards of the system such as human resource management, procedures and guidelines, reporting, etc., including information technology system and quality control system. The Company believes that it is fundamental to establish efficiency and effectiveness of internal control system.

The Company will support and provide a system for recording and storing information and documents, efficient data accessing and backup. It can be used in the event of an emergency including preventing the use of the Company's information for personal and companions benefits either directly or indirectly and to ensure that important information and documents are recorded and maintained correctly, completely, transparently and verifiable.

For the Company to achieve the company's commitments as mentioned above, the Company has the guidelines for recording and storing information and documents as follows:

1. To arrange storing data and documentation, efficient data accessing and backup in accordance with the Company's Quality Policy (ISO 9001). In this regard, to protect against unauthorized or not involved accessing and using data and documents in abuse including amending, editing and destroying such data and documents.
2. To arrange appropriate and adequate security measures for information technology systems and improve the said measures to be effective and consistent with the changing environment, as well as regularly supervising and monitoring the implementation of such measures. This is to prevent information technology risks such as data or documents being lost or leaked or altered without rights or permission, etc.

## Monitoring and Review

The Company's directors, executives and employees at all levels are responsible for monitoring and reporting information to channels designated by the Company if any suspected incidents may violate this anti-corruption policy or act or refrain from acting unlawfully. This is in accordance with whistleblowing policy, misconduct and corruption.

The Company has arranged for reviewing the policy and guidelines against corruption at least once a year. To ensure that it is current and consistent with the changing environment, such as changes in laws and/or changes in procedures and guidelines of government sectors, etc.

## Penalties

The Company will take disciplinary action against any person, including directors, executives and employees who violate the compliance with this Anti-Corruption Guidelines, including anyone who acknowledges suspected corruption but ignores whistleblowing policies, misconduct and corruption, or does not take appropriate action to deter or mitigate any damages a reality resulting in the corruption, which is penally under the Company's Work Rule, both disciplined and terminated under applicable laws. In this regard, the directors, executives and employees could not be possible cite any dissemination of this manual as an excuse for failure to comply with this manual.