



### **Anti-Fraud and Corruption Policy (2024 Edition)**

EGCO's Board of Directors, in its Meeting No. 6/2024 held on September 18, 2024, approved the revision of the anti-corruption policy. This edited policy enhances its scope and clarity to better reflect current circumstances. Importantly, it now also encompasses fraud prevention. Furthermore, this policy also expands the scope of enforcement, covering the practice of business partners, agents and intermediaries. This aims to ensure that they, as EGCO's representatives, understand and correctly follow the Company's Anti- Fraud and Corruption Policy



Khanom Electricity Generating Company Limited

## **Anti-Fraud and Corruption Policy**

**(2024 Revised Edition - Translation)**

### Terms and definitions

**"The Company"** means Khanom Electricity Generating Company Limited or KEGCO.

**"EGCO"** means Electricity Generating Public Company Limited.

**"Personnel"** means Directors, the President, Executives, Officers at all levels and all kinds of employees acting as the Company's Personnel.

**"Management"** means Managing Director, Plant Manager and Division Manager.

**"Fraud"** means intentionally committing illegal actions to gain an advantage for oneself or another person.

**"Corruption"** means a direct and indirect allocation, offer, promise, or commitment of giving bribes to an officer, representative or agency of a government or private sector, with an intention to influence such person to take or not to take an action for unfair benefits.

Corruption also includes accepting or requesting direct and indirect bribes from an officer, representative or agency of a government or private sector, in order to take or not to take an action for unfair benefits.

However, giving and taking gifts or token of appreciation in agreement with applicable laws, rules, notices, regulations, traditions or business etiquettes are allowed.

**"Bribe"** means money or other forms of compensation that is given with an intention to influence the receiver to take or not to take an action for unfair benefits. Bribe would also include facilitation payment as well.

**"Facilitation Payment"** is an unofficial financial payment for an officer, representative or agency of a government or private sector with an intention to influence such person to carry out or expedite the procedures or facilitate their routine operations.

**“Donations”** means contributions in cash and in kind to other agencies or organizations for charity and public services to aid or support the society, community or people in-need.

**“Support”** means contributions in cash and in kind to a client, supplier, partner or others for business purposes, promotion of the Company or business relationships.

**“Political support”** means assistance given to political parties, networks, influencers or candidates in a form of money or others, such as lending or donating equipment, providing free technological services, promoting advertisements or campaigns or encouraging the Personnel to participate in an activity of a political party on behalf of the Company for an undeserved business advantage or for the Company's or personal benefits.

**“Gift”** means money or other forms for contribution given on occasions to foster goodwill or establish positive relationships, including business opportunities. Gifts may also be given to commemorate significant corporate events.

**“Entertaining arrangement”** means activities or expense for accommodation, transportation, meals beverage and other services in relation to business engagement, trips, site visits, etc.

**“Public-sector employee”** means a current or former officer or consultant of state enterprises or government agencies who has a regular wage and position. Besides the employees, it also covers a director and subcommittee's member of government agencies or state enterprises.

**“An agent or business intermediary”** means the entity, organization, or individual appointed or hired to undertake tasks for the benefit of the company.

**“Business Partner”** means joint ventures, shareholders, suppliers, customers and other business-related parties.



## Anti-Fraud and Corruption Policy

Aiming to ensure that the business activities with a potential to involve in corruption will be carried out with care, *the Company* established a written "Anti-Fraud and Corruption Policy". This is aimed to prevent and resist any forms of fraud and corruption whether directly or indirectly in order to comply with the commitment that *the Company* uphold, **"Fraud and Corruption is an unacceptable act in our business conduct whether it will be with the government or the private sector"**.

Anti-Fraud and Corruption Policy shall be applied to all *Personnel*. Directors, Managing Director, executives, officers and employees at all levels, as the *Personnel* of *the Company*, must conform to this policy as well as Code of Conduct. They must not directly or indirectly involve in fraud and corruption for the benefit of *the Company*, their family, their acquaintances and themselves. Also, *the Company* strongly encourages its joint ventures, associates, business partners, suppliers, agents and business intermediaries to follow the Anti-Fraud and Corruption Policy.

The Anti-Fraud and Corruption Policy is as follows:

1. The Personnel must act as follows:

- 1.1 Refrain from allocating, offering, promising, or committing of giving direct or indirect bribes and facilitation payments to any officers, representatives and agencies from both government and private sectors, or any related parties, in order to favor each other's benefits, or for the Company's or personal advantages.
- 1.2 Refrain from accepting or requesting direct or indirect bribes and facilitation payments and other monetarily quantifiable benefits from any officers, representatives or agencies from both the government and private sectors, or any related parties, in order to support agreements, business contracts or personal benefits.
- 1.3 Refrain from providing political supports.
- 1.4 Refrain from requesting donations, supports and gifts, except for the gifts that are allowed to be received in the Anti-Fraud and Corruption Guideline.
- 1.5 Provide gifts and entertaining arrangements, as well as donations and supports (other than those mentioned in 1.3), in a transparent manner with a clear objective and in compliance with applicable laws, rules, regulations, traditions or business etiquettes. Gifts should be provided on appropriate occasions and within relevant contexts.

2. The *Company* allows an appointment or employment of a Public-sector Employee as *the Company's* Personnel, provided that the Personnel must strictly adhere to the Anti-Fraud and Corruption Policy and Guideline, the Conflict of interest Policy and Guideline, and all related rules and regulations.
3. The *Personnel* are responsible for immediately notifying any traces or potentialities of fraud and corruption to the designated committees for whistleblowing via *the Company's* website, e-mail or post, as well as cooperating in any investigation. Should there be any questions regarding the compliance with the Anti-Fraud and corruption Policy and Guideline, they shall seek consultations from their supervisors, or the Anti-Fraud and corruption Working Team Through e-mails.
4. *The Company* will fairly treat and protect the Personnel who denied to be involved in fraud and corruption, whistleblowers of company-related fraud and corruptions or the persons who cooperate in the investigation. They must not suffer from any demotions, penalties, or negative impacts resulting from those actions. The complaints shall be kept confidential and not disclosed to unrelated parties except when required by law.
5. The *Personnel* violating the Anti- Fraud and Corruption Policy is subject to disciplinary actions, including reprimand, probation, suspension and dismissal, and/or punishment according to applicable laws.
6. Agents or business intermediaries must adhere to *the Company's* Anti-Fraud and Corruption Policy and Guideline.
7. *The Company* is well aware of effective communication and promotion to create understanding for the *Personnel* and all stakeholders.

The scope of responsibility for Anti-Fraud and Corruption action is as follows:

1. The Board of Directors is responsible for putting in place a comprehensive Anti-Fraud and Corruption Policy and ensuring that an effective Anti-Fraud and Corruption Guideline is implemented.
2. The Management is responsible for the following:
  - 2.1 Putting the Anti-Fraud and Corruption Guideline in place.

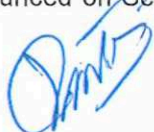


- 2.2 Reviewing Anti-Fraud and Corruption policy, fraud and corruption risks and their mitigation measures, providing useful recommendations and revising them to be practical and up to date before proposing to the Board of Directors.
- 2.3 Supporting and encouraging the *personnel* to adhere to the Anti-Fraud and Corruption Policy and Guideline by managing systems and procedures to be in accordance with the Good Corporate Governance Principles and implanting Anti-Fraud and Corruption in corporate culture.
3. The Anti-corruption Working Team is responsible for the following:
  - 3.1 Preparing the Anti-Fraud and Corruption Policy, conducting biennial reviews and proposing to the Management should there be any revisions.
  - 3.2 Preparing the Anti-Fraud and Corruption Guideline, conducting biennial reviews and proposing to the Management should there be any revisions.
  - 3.3 Communicating and providing consultations for the *Personnel* regarding the compliance with the Anti-Fraud and Corruption Policy and Guideline.
  - 3.4 Assessing fraud and corruption risks in *the Company's* business operation, preparing their mitigation measures, reviewing annually and proposing to the Management for any revisions.
4. EGCO's Internal Audit Division is responsible for auditing the business operations to ensure its compliance with the Anti-Fraud and Corruption Policy and Guideline, and its consistency with the table of authority, regulations or applicable laws before reporting to EGCO's Audit Committee.

I, hereby, declare that this policy must be strictly adhered to.

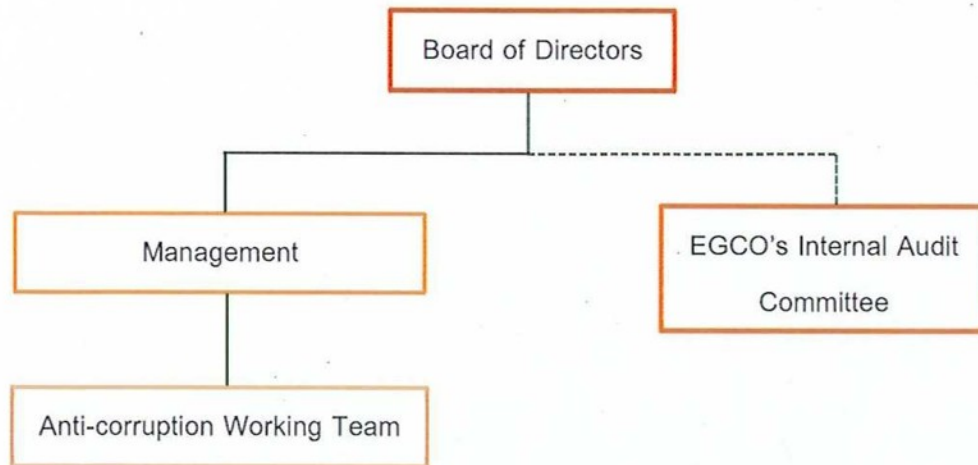
This policy shall be effective October 1, 2024

Announced on September 30, 2024



(Ms. Jiraporn Sirikum)  
Chairman

**Structure of responsible persons for the Anti - Fraud and Corruption Policy**



*An English version of the Anti- Fraud and Corruption Policy has been prepared from the Thai version. In the event of a conflict or a difference in interpretation between the two languages, the Thai version shall prevail.*