



Khanom Electricity Generating Company Limited

## **Anti-corruption Policy**

## **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.

**“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 show favor.

**“Entertaining arrangement”** means an arrangement or expense for accommodation, transportation, meals and other in relation to 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.

## Anti-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-corruption Policy". This is aimed to prevent and resist any forms of corruption whether directly or indirectly in order to comply with the expression that the Company uphold, **"Corruption is an unacceptable act in our business conduct whether it will be with the government or the private sector"**.

Anti-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 corruption for the benefit of the Company, their family, their acquaintances and themselves. Also, the Company strongly encourages its clients, suppliers and business partners to follow the Anti-corruption Policy.

The Anti-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 from any officers, representatives or agencies from both 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 accepting donations, supports and gifts, except for the gifts that are allowed to be received in the Anti-corruption Guideline.
  - 1.5 Give gifts and entertaining arrangements, as well as donations and supports (other than such in 1.3) in a transparent manner with a clear objective and in compliance with applicable laws, rules, regulations, traditions or business etiquette.
2. The Company allows an appointment or employment of a Public-sector Employee as the Company's Personnel. Still, the Personnel must strictly follow the Anti-corruption Policy and Guideline as well as Conflict of Interest Policy and Guideline.

3. The Personnel are responsible for immediately notifying any traces or potentialities of corruption to the designated committees for whistleblowing via 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-corruption Policy and Guideline, they shall seek consultations from their supervisors, or the Anti-corruption Working Team through e-mails.
4. The Company will fairly treat and protect the Personnel who denied to be involved in corruption, whistleblowers of company-related corruptions or the persons who cooperate in the investigation. They must not suffer from any demotions, penalties, or negative impacts resulting from those actions.
5. Personnel violating the Anti-corruption Policy is subject to disciplinary actions, including reprimand, probation, suspension and dismissal, and/or punishment according to applicable laws.
6. 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-corruption action is as follows:

1. The Board of Directors is responsible for putting in place a comprehensive Anti-corruption Policy and ensuring that an effective Anti-corruption Guideline is implemented.
2. The Management is responsible for the following:
  - 2.1 Putting the Anti-corruption Guideline in place
  - 2.2 Reviewing the anti-corruption policy. Reviewing the corruption risks and measures to manage corruption risks. Providing useful suggestions for making and improving a policy to be up-to-date and concrete. and present to the Board of Directors.
  - 2.3 Promoting and supporting personnel to adhere to the Anti-corruption Policy and Guideline by managing systems and procedures to be in accordance with the good corporate governance principles, and implanting anti-corruption in corporate culture.
3. The Anti-corruption Working Team is responsible for the following:
  - 3.1 Preparing the Anti-corruption Policy, reviewing annually and proposing to the Management if there are any revisions.
  - 3.2 Preparing the Anti-corruption Guideline, reviewing annually and proposing to the

Management if there are any revisions.

- 3.3 Communicating and providing consultations for the Personnel regarding the compliance with the Anti-corruption Policy and Guideline.
  - 3.4 Assessing corruption risks in the Company's business operation, preparing their mitigation measures, reviewing annually and proposing to the Management for any revisions.
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4. EGCO's Internal Audit Division is responsible for auditing the business operations to ensure its compliance with the Anti-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 April 1, 2022

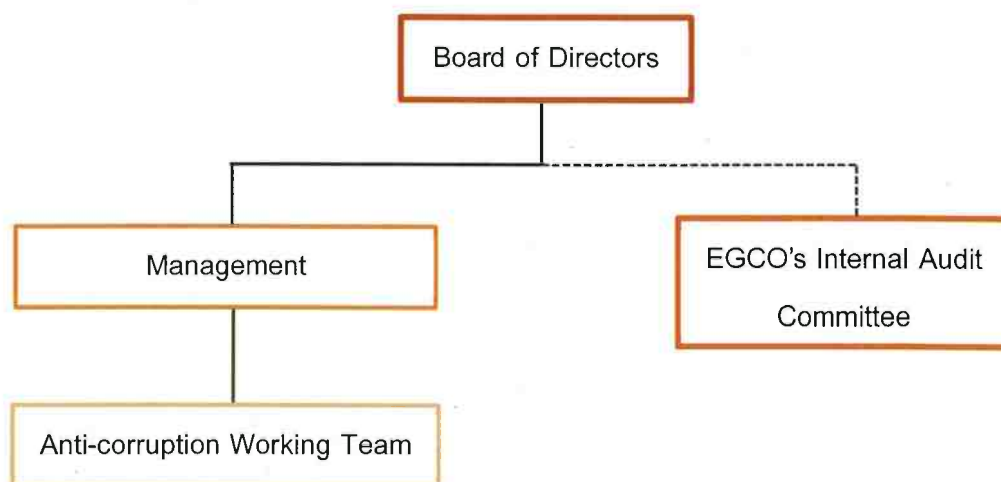
Announced on March 15, 2022



(Mr. Thepparat Theppitak)

Chairman

### Structure of responsible persons for the Anti-corruption Policy



*An English version of the Anti-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.*