



PTG ENERGY GROUP

Supporting documents.

on

(Anti-Corruption Policy)

Revision history

13	01/01/68	Annual Review for 2024
12	01/01/67	Annual Review for 2023
11	11/05/66	Amend the definition of sponsorship funds.
10	01/01/66	Annual Review for 2022
09	01/01/65	Revise the entire document.
08	01/01/64	Revise the entire document.
07	01/01/63	"Amend the complaint handling unit to align with the whistleblowing or complaint policy."
06	01/01/62	Annual Review for 2021
05	01/01/61	Annual Review for 2020
04	23/12/59	Annual Review for 2016
03	22/12/58	Annual Review for 2015
02	13/05/58	Changed the name to "Pyrenees Oil Company Limited"
01	26/12/57	Annual Review for 2014
00	01/11/57	Initial Issue
Revision number	Effective date.	Revision details



(Anti-Corruption Policy)

Subject	Table of Contents	Page
1. Introduction		2
2. Objectives		2
3. Scope		2
4. Definitions		2
5. Anti-Corruption Policy		3
6. Roles and Responsibilities in Anti-Corruption		3
7. Procedures for Implementing the Anti-Corruption Policy		4
8. Procedures for Data Management and Financial Recordkeeping		5
9. Guidelines on Disclosure and Confidentiality		6
10. Guidelines on Giving or Receiving Gifts, Other Expenses, or Benefits		6
11. Guidelines on Hospitality		7
12. Guidelines on Charitable Donations		7
13. Guidelines on Giving or Receiving Sponsorships		7
14. Guidelines on Political Assistance or Support under the Constitution		8
15. Guidelines on Hiring Government Employees		8
16. Internal Audit and Control Process		9
17. Monitoring and Review		9
18. Guidelines on Protection Measures and Confidentiality		10
19. Guidelines for Investigation and Penalties		10
20. Implementation of the Policy by the Company and Relevant Persons		10
21. Dissemination of Anti-Corruption Guidelines		11
22. Whistleblowing or Corruption Complaint Channels		11



(Anti-Corruption Policy)

PTG Energy Group and its subsidiaries ("the Group") are committed to conducting business with integrity, transparency, ethics, and social responsibility towards all stakeholders. This commitment aligns with good governance policies and includes a zero-tolerance stance against all forms of corruption, both direct and indirect.

The Group has expressed its intention to participate in the Collective Action Coalition of the Thai private sector against corruption by signing the declaration of intent of the Collective Action Coalition. It mandates that the personnel of the Group strictly adhere to the Group's Anti-Corruption Policy. Since 2014, the Group will not engage in any actions to offer benefits to government and private sector officials to gain a business advantage or acquire business through improper means. The Group opposes anyone involved in corruption through practices such as solicitation, offering or accepting bribes, extortion, conflicts of interest, money laundering, embezzlement, gifts, hospitality, travel expenses, donations, sponsorships, facilitation payments, political contributions, social and community investments, interactions with government officials, trading through business partners, representatives, and other intermediaries, joint ventures, use of company assets, mergers and acquisitions, as well as minority shareholder interests. The Group does not condone any corrupt behavior within the organization. It has conducted risk assessments and established guidelines for all personnel at every level, including directors, executives, and employees, to ensure compliance with laws and ethical standards.

To achieve this intention and to ensure that the Group has clear policies defining roles, responsibilities, operational procedures, and measures to prevent corruption arising from its business activities in all forms, the Group has developed an Anti-Corruption Policy. This policy defines roles and responsibilities and operational guidelines to prevent and combat corruption in written form, ensuring clarity in practice and guiding the organization towards sustainability.

Objectives

1. To demonstrate the Group's commitment to opposing all forms of corruption, both direct and indirect.
2. To establish criteria and guidelines for implementation, including the processes for reviewing and monitoring compliance with this policy.
3. To create awareness, understanding, and practical approaches regarding the Anti-Corruption Policy among directors, executives, and employees at all levels, fostering a sense of responsibility and emphasis on combating corruption. This also includes encouraging vigilance and reporting of any observed corruption through designated whistleblowing channels.

Scope

1. This policy is applicable to directors, executives, and employees at all levels of the Group, serving as a guideline for their work conduct.
2. The Group aims to ensure that representatives and/or intermediaries acting on behalf of the company also adhere to the guidelines set forth in this policy.

Definition

Corruption refers to actions or omissions in the performance of duties or the abuse of power in a position of authority in any form. This includes giving or receiving bribes, offering or promising favors, accepting inducements leading to illegal actions or breaches of trust, and soliciting or demanding assets, money, goods, rights, or any other benefits that violate morals, ethics, laws, regulations, and policies towards government officials or any other individuals conducting business with the Group, whether domestically or internationally, in order to obtain undue benefits for the organization, oneself, friends, acquaintances, or related parties.



(Anti-Corruption Policy)

Political Contribution refers to the provision of assets, money, goods, rights, or any other benefits to assist, support, or for any other advantage to political parties, politicians, or individuals with political responsibilities, as well as political activities, whether directly or indirectly.

Charitable Donation refers to the voluntary giving of time, money, assets, or personnel to organizations or individuals to support charitable activities, without expecting any commercial benefits in return.

Sponsorships refer to subsidies, financial assistance, contributions, or reasonable payments made or received to support business operations, promote products or the company's reputation, benefiting the establishment of commercial credibility and strengthening business relationships. Such sponsorships must be conducted transparently, with proper documentation, and must not involve payments that may have hidden agendas for services or benefits that are difficult to measure and track, which could be associated with corruption or bribery. This definition excludes any remuneration specified in promotional items, promotional activities under contracts or agreements, or contractual engagements.

Hospitality refers to the provision of meals, beverages, or any services, including entertainment, sports viewing, or participation in recreational or sports activities, that occur on special occasions as per customary practices. This hospitality is offered to external individuals who are doing business or engaging with the company.

Facilitation Payment refers to small payments made informally to government officials solely to ensure that they carry out their duties or to encourage them to expedite a process. This process should not require the discretion of the government official and must fall within the lawful duties of that official, as well as being a right that the legal entity is entitled to under the law.

Related Persons refers to spouses, children, parents, siblings, and close relatives of directors, executives, and employees at all levels of the Group, as well as employees, representatives, affiliates, or any individuals acting for or on behalf of the Group, regardless of whether they have any duties or authority in doing so.

Government Agencies refer to government departments or entities under the supervision of the state at all levels, including central government, regional government, local government, and state enterprises.

Government Officials refers to "government officials" as defined in the laws concerning the prevention and suppression of corruption, and includes civil servants, officials, employees of state enterprises, contractors, representatives, or any other individuals who represent the following entities.

- (1) Ministries, departments, or government agencies
- (2) International organizations
- (3) Political parties, public office holders, or candidates for election (both government and opposition), local executives
- (4) Regulatory agencies
- (5) State enterprises or companies or other organizations that are owned or controlled by the state or government agencies.

Anti-Corruption Policy

The Group has a policy that directors, executives, and employees at all levels of the Group shall not engage in or accept any forms of corruption, under any circumstances. They are required to strictly adhere to the anti-corruption policy. The Group will implement a policy for regular review and assessment of compliance with this policy to ensure alignment with changes in business practices, regulations, and legal requirements.

Roles, Duties, and Responsibilities Regarding the Prevention and Combatting of Corruption



(Anti-Corruption Policy)

In addition to strictly adhering to policies and various operational guidelines, the Group has defined the roles and responsibilities of directors, executives, and other individuals as follows:

1. The Board of Directors has the role, duty, and responsibility to review and consider the anti-corruption policies and operational guidelines.

The Board of Directors has the role, duty, and responsibility to oversee, monitor, and establish an effective support system for combating corruption. This includes delegating the implementation of the anti-corruption policy to the Board of Directors. In cases where the Audit Committee reports acts of corruption that impact the company, the Board of Directors is responsible for advising, recommending, considering disciplinary actions, and collaboratively finding solutions with the Chief Executive Officer, the Managing Director, and the Executive Committee. This ensures that the Board of Directors is aware of and prioritizes the fight against corruption, fostering it as part of the organizational culture.

2. The Audit Committee has the role, duty, and responsibility to review the company's operations in accordance with the anti-corruption policy as follows

- 2.1 Review the anti-corruption policy and operational guidelines received from the Corporate Governance Committee to ensure their suitability for the business model, the company's environment, and organizational culture, and present them for approval to the Board of Directors.

- 2.2 Assess the appropriateness of changes to the anti-corruption policy and operational guidelines received from the Corporate Governance Committee and present them for approval to the Board of Directors.

- 2.3 Review the audit reports, internal control systems, and risk assessments related to corruption to ensure compliance with international standards, ensuring they are robust, appropriate, up-to-date, and effective, with minimal impact on the financial status and performance of the Group.

- 2.4 Receive reports of potential corruption-related activities involving individuals within the organization, investigate the facts as reported, and present the matter to the Board of Directors for consideration of disciplinary actions or solutions to address the issues.

3. The Internal Audit Department has the following roles and responsibilities:

- 3.1 Review and assess the implementation of the internal audit plan to ensure it is conducted correctly and in accordance with policies, operational guidelines, authority, procedures, and legal requirements, to ensure that there are adequate control systems in place to address potential risks of corruption. The findings should be reported to the Audit Committee.

- 3.2 Carry out tasks assigned by the Audit Committee regarding the investigation of corruption related to the Group, in addition to the established internal audit plan.

4. The Chief Executive Officer, the Managing Director, and the management team have the following roles and responsibilities

- 4.1 Establish anti-corruption policies and operational guidelines, as well as promote and support these policies and guidelines.

- 4.2 Communicate with personnel within the organization and relevant parties to ensure awareness of the anti-corruption policies and operational guidelines.

- 4.3 Implement oversight and control measures to ensure that employees adhere to the anti-corruption policies and operational guidelines, including conducting audits and considering disciplinary actions.

- 4.4 Review the appropriateness of the policies and the effectiveness of the guidelines for combating corruption to ensure they remain relevant to business changes or legal requirements, and present recommendations to the Board of Directors.



(Anti-Corruption Policy)

Guidelines for Implementing the Anti-Corruption Policy

The Group has mandated that the Board of Directors, executives, and employees at all levels strictly adhere to this Anti-Corruption Policy as follows

1. Directors, executives, and employees at all levels must understand and comply with the Anti-Corruption Policy, refraining from engaging in or being involved with any form of corruption, both directly and indirectly.

2. Directors, executives, and employees at all levels must not neglect or ignore any actions that could constitute corruption related to the Group. They must immediately report such incidents to their supervisors or the responsible department/person and cooperate in any investigation of facts. If there are doubts or inquiries, they should consult their supervisors or designated individuals responsible for overseeing compliance with the Group's ethical standards through the established channels. The Group will ensure fairness and protect whistleblowers, informants, and those cooperating in reporting corruption immediately.

3. The Group will ensure fairness and protect employees who refuse or report corruption related to the Group by safeguarding whistleblowers and informants according to the guidelines established by the company to protect and ensure fairness for employees who provide information or clues regarding corruption or fail to comply with laws, regulations, and the company's ethical standards.

4. The Group communicates the Anti-Corruption Policy to directors, executives, and employees at all levels through various channels, such as new employee training and annual internal communications, to foster understanding of the impacts and necessity of adhering to this policy. Additionally, appropriate channels will be established to allow individuals to report clues, suggestions, and complaints regarding corruption promptly.

5. The Group will disseminate knowledge to external parties performing duties related to the Group to comply with the Anti-Corruption Policy, following the established practices for disseminating this policy. This includes informing the public, business partners, and stakeholders about reporting channels for clues or complaints through various means, such as the Group's website and annual reports, to build understanding of the impacts and ensure the policy is effectively implemented.

6. The Group establishes transparent and accurate financial reporting mechanisms in accordance with internationally recognized accounting standards. Any use of the Group's funds or assets must be explicitly identified in the Group's name, with expenditures stating a clear purpose and accompanied by verifiable evidence to prevent inappropriate conduct. All transactions should adhere to the Group's established procedures to ensure that donations and sponsorships are not used for corrupt practices.

7. Directors, executives, and employees at all levels must not accept or provide gifts, hospitality, or other benefits that are excessive or inappropriate to government officials or individuals doing business with the Group. Prior to accepting any gifts, they should ensure compliance with the law and the Group's regulations, ensuring that gifts exchanged in the course of work are reasonable and suitable for each occasion.

8. The Group establishes internal control processes to prevent corruption. These processes encompass sales, marketing, procurement, human resource management, finance and accounting, data recording, operations, and other internal processes related to the Anti-Corruption Policy, which must be strictly adhered to.

9. This policy and its practices cover human resource management processes, including recruitment, selection, promotion, training, performance evaluation, and compensation, ensuring that supervisors at all levels communicate and help employees understand these policies for business activities under their responsibility and oversee their effective implementation, reflecting a commitment to the Anti-Corruption Policy.

10. The Group implements risk management measures by analyzing the risk of corruption in business operations at both departmental and organizational levels, determining the significance of those risks, reviewing risk management measures, and continuously monitoring risk management progress to prevent corruption, assessing the operational risks that may lead to corruption at least once a year.



(Anti-Corruption Policy)

11. The Group will conduct internal audits to ensure that the established internal control system and risk management measures are effective and help the company achieve its goals, ensuring compliance with requirements and regulations within the Group.

Guidelines for Data Collection and Financial Data Backup Processes

To achieve this commitment under the business ethics and good corporate governance policies, the group of companies has established practices for the collection, access, recording, maintenance, and backup of financial data, as detailed below.

1. The group of companies has a policy to comply with applicable standards, principles, and laws regarding the reporting of accounting and financial information.
2. The documents and financial data stored are organized, and data is maintained with a system of information technology security to prevent unauthorized individuals from accessing the information.
3. Operations related to information technology and communication must adhere to the policies and practices regarding access or control of information usage and the security of the group's information.
4. Risks are assessed, and control measures are implemented to adapt to the continuously changing environment.
5. Directors, executives, and employees at all levels must keep user account names and passwords confidential, not to be shared with others, and must not disclose, distribute, or allow unauthorized access to this information.
6. The group of companies does not permit the recording of false, incorrect, incomplete, or manipulated information in accounts, nor shall there be any off-balance-sheet accounts used to support or conceal inappropriate expenses.

Practices for Information Disclosure and Confidentiality

The group of companies discloses necessary information to directors, executives, employees, customers, business partners, and stakeholders accurately, completely, timely, transparently, equitably, and reliably, in accordance with good corporate governance. This is presented in the annual report Form 56-1 One Report of the group of companies, and is also published on the group's website, among other channels.

The practices for disclosing information and maintaining confidentiality are as follows

1. The group maintains secure storage of documents and copies related to confidential transactions and disposes of them when no longer needed, limiting access to only responsible employees.
2. A culture of confidentiality is fostered through regular communication, ensuring that employees at all levels are aware of their responsibilities to maintain secrecy.
3. An annual review is conducted to ensure that the storage and control of information documents are current and secure.

Guidelines for Giving or Receiving Gifts, Other Expenses, or Any Other Benefits

The group of companies mandates that the acceptance and giving of gifts, presents, entertainment, assets, or any other benefits must strictly adhere to the details outlined in the policy on giving or receiving gifts, assets, or other benefits. The group has established regulations for the disbursement of money, gifts, or assets, specifying the budget limits and approval authority. Clear documentation must accompany all disbursements to ensure that such payments are not made for corrupt purposes or to provide political assistance to any individual. Furthermore, information and details related to these disbursements must be reviewed by the internal audit department to ensure compliance with established policies and procedures.

1. Directors, executives, and employees at all levels must not solicit or accept gifts, expenses, or any benefits



(Anti-Corruption Policy)

from customers, business partners, or stakeholders involved with the group of companies in any situation that may affect the recipient's business decisions.

2. It is prohibited for directors, executives, and employees at all levels to accept or promise to accept, or to give money, assets, goods, or any other benefits to any person with the intention of inducing them to act or refrain from acting, including any actions that are improper or dishonest, whether overtly or covertly.

3. If gifts, compensation, or other benefits valued over 3,000 Baht per person per occasion are received, or if the gifts are in the form of cash or cash equivalents, such as gift cards or vouchers, the employee or recipient must report this to their superior and submit the gift to the Human Resources department. They must also inform their supervisor, and such gifts will be considered company assets.

4. Evidence of expenditures reflecting the value of gifts or other benefits must be retained for future auditing.

5. Compliance with these guidelines must not contradict the announcements of the National Anti-Corruption Commission regarding the criteria for receiving assets or other benefits. Additionally, expenses and details must be assessed to ensure they do not serve to induce public officials or individuals conducting business with the group to act improperly or make decisions that benefit the business interests of the group.

6. Information about the guidelines for dealing with gifts, expenses, or other benefits must be communicated to directors, executives, and employees at all levels.

7. The group of companies will inform customers, partners, or stakeholders involved with the business about its policies and practices concerning gifts, expenses, or other benefits through brochures related to the company's anti-corruption policy and/or the group's website.

Guidelines for Hosting Events

1. Payment for hosting events must be approved by the supervisor according to the established authority levels and must clearly state the purpose and the external organization involved.

2. The expenses related to hosting or services must directly pertain to the event or service that will benefit the business, such as accommodation, food, beverages, and entertainment costs.

3. The expenses must comply with customary practices, not violate any laws, and the individuals being hosted must not be employees, staff, directors, or managers of the business unless they have a role in participating in the hosted event.

4. Spending must be reasonable and should not impact decision-making in operations or create any conflict of interest.

5. Records must be kept detailing the individuals or external organizations involved, as well as the names of the employees from the group of companies who participated in the event, for future auditing purposes.

Guidelines for Giving or Receiving Charitable Donations

The giving or receiving of donations for charitable purposes, whether in the form of financial assistance or other forms such as providing knowledge or public donations, is permissible for the group of companies as part of its Corporate Social Responsibility (CSR) activities. The group has a policy to oversee the giving or receiving of charitable donations in various forms to ensure that such activities do not seek business returns and do not provide opportunities for corruption. Clear, stringent, and effective procedures and controls will be established to ensure proper oversight, along with the ability to audit and track supporting documentation at all times. The details are as follows:

1. Giving or Receiving Donations must be for public charitable purposes or have a clear objective, not for bribery or hidden benefits. It must be conducted transparently and in accordance with applicable laws.

2. There must be proof that the donated activities are for charitable purposes and are not related to benefits or compensation for any individual or organization, except for acknowledgments following customary practices.

3. Approval must be obtained from authorized personnel according to the company's regulations and must



(Anti-Corruption Policy)

adhere to good governance policies and business ethics.

4. The recipient organization must be a credible entity and/or established legally.

5. Those wishing for the company to participate in donations are responsible for keeping evidence showing the value of the donations and clearly identifying the individuals or organizations involved in giving or receiving donations. This documentation should be submitted to the compliance department to report the company's donations to the relevant committees.

Guidelines for Providing or Receiving Sponsorship

The company group has a policy to regulate the provision or receipt of sponsorships in various forms to ensure that such activities do not become a channel for corruption. Clear, thorough, and effective procedures and controls are established to ensure that all documentation and evidence can be reviewed and tracked at any time. The details are as follows

1. The provision or receipt of sponsorship must be for legitimate support or have a clear purpose. It must not be used as a bribe or for hidden benefits, and must be conducted transparently and in accordance with applicable laws.

2. The provision or receipt of sponsorship must be documented internally, with clear objectives stated. The sponsorship must be used to support business operations, promote the company's products or reputation, and enhance credibility in business relations. It must align with the company group's Code of Conduct, emphasizing integrity, transparency, and good corporate governance policies, without inappropriate hidden purposes.

3. The sponsorship must be reviewed and approved in accordance with the approval authority guidelines.

4. The results and follow-up of the sponsorship must be evaluated within a specified timeframe, with clear start and end dates for the activity.

5. The location where the sponsorship funds are used must be clearly stated and verifiable, with supporting evidence of fund receipts or official documents from the relevant authorities. This applies to both government and private sector sponsorship requests, ensuring that expenses are controlled within the approved budget for the maximum benefit to the company.

6. Responsible personnel must be clearly assigned for activities requiring sponsorship, and there must be regular follow-ups and reporting to supervisors. The process must also be auditable.

7. The expected benefits must be clearly stated, including both direct and indirect benefits, and described both quantitatively and qualitatively.

8. Accurate data on sponsorships should be collected to aid in analysis, planning, and decision-making regarding future sponsorships.

Guidelines for Providing Political Support or Assistance within the Constitutional Framework

The Group has a policy of political neutrality, refraining from providing support or engaging in actions that could indicate favoritism toward any political party, whether directly or indirectly. This includes not utilizing the Group's resources in activities that could compromise its political neutrality or potentially harm the Group due to involvement in such activities. The specific guidelines are as follows

1. Directors, executives, and employees have the constitutional right to participate in and support political activities in a personal capacity, as permitted by law, provided these activities are conducted outside of work hours and not in the name of the company.

2. It is strictly prohibited to use one's official authority to influence, pressure, or coerce colleagues and subordinates to support any political activities, whether directly or indirectly, involving political parties, political



(Anti-Corruption Policy)

groups, or politicians.

Guidelines for Hiring Government Employees

To ensure that the recruitment of government employees by the company is conducted transparently, fairly, and does not create any conflicts of interest, the company aims to prevent such hiring from being a form of compensation for gaining any benefits. The company will avoid involving individuals in its operations if they or their related persons had significant involvement during their time as government employees. The following measures are in place as guidelines for this process

1. The process of selecting, approving the employment, and determining compensation for hiring government employees to serve as directors and senior executives must be carefully considered by the relevant committees.
2. The Nomination and Remuneration Committee or the Human Resources Department must conduct due diligence on individuals being recruited for director, advisor, or executive positions in the company to identify any potential conflicts of interest before the appointment.
3. The company will take appropriate measures to ensure that former government employees do not use confidential government information to unfairly benefit the company in procurement, bidding, or similar activities.
4. The company will implement measures to disclose information about the hiring of government employees in significant positions to the public for transparency and accountability.

Audit and Internal Control Process

The audit and internal control process of the Group is a collaborative operational procedure established by the Board of Directors, management, and employees across all departments. It is designed to ensure that the steps and processes in place help the organization achieve its objectives and serve as a tool to prevent fraud in the operational processes of all units. The details are as follows

1. Each department designs internal controls and prepares written procedures or workflows for management within each department to review and for the Board of Directors to approve for implementation. These procedures clearly define the duties and responsibilities of employees and are stored in an accessible location for staff to reference.
2. Management in each department reviews operational procedures or workflows regularly, at least annually, or when significant operational changes occur. This ensures that the Group's policies align with good control principles and current practices. Additionally, audits of all departments' operations are conducted to ensure compliance with regulations and to identify any deficiencies, providing recommendations to enhance operational efficiency and effectiveness in line with good corporate governance policies.
3. The Group has implemented an internal control system covering financial, accounting, and record-keeping activities. The internal audit department is responsible for reviewing compliance with these internal control systems, providing recommendations and solutions for improvements to enhance internal control effectiveness, and detecting potential risks. Furthermore, the department reviews compliance with anti-corruption policies, and any identified deficiencies are reported to the Corporate Governance Committee and the Audit Committee for further improvement and development by each department's management.
4. The Audit Committee oversees the financial reporting process, internal control systems, internal audits, legal compliance, and processes related to anti-corruption policies. Additionally, they recommend the appointment of auditors and determine their compensation based on suitability.



(Anti-Corruption Policy)

Guidelines for Investigation and Disciplinary Actions

Board members, executives, and employees at all levels of the company who violate or fail to comply with this policy will face legal penalties and sanctions according to the company's regulations. However, the company will not demote, penalize, or take any negative actions against those who refuse to engage in corrupt practices, even if such refusal results in a loss of business opportunities for the company. The company has a clear communication process regarding such matters, such as in cases where an employee is offered to engage in corruption by a public agency to expedite their work, but the employee has refused to do so. The details are as follows:

1. Upon receiving a whistleblower report, the Chief Executive Officer and the Managing Director, or the Audit Committee, will be responsible for filtering and investigating the facts.
2. If the investigation finds credible evidence that the accused has engaged in corruption, the company will inform the accused of the allegations and grant them the opportunity to prove their innocence by providing additional information or evidence that demonstrates their lack of involvement in the alleged corrupt activities.
3. In cases where it is found that the accused has indeed committed acts of corruption, which constitutes a violation of the anti-corruption practices and the business ethics of the company, the company will impose penalties based on the facts and surrounding circumstances in accordance with company regulations. An internal communication system will be used to publicize the penalties in cases where individuals are found not to comply with the anti-corruption policy.

Implementation of the Policy by the Company and Relevant Individuals

1. The group of companies will inform and encourage subsidiaries, joint ventures, other companies under its control, and business representatives to implement the anti-corruption policy.
2. Employees, representatives, or any business intermediaries must not act with the intention of committing corruption.

Dissemination of Anti-Corruption Practices

The group of companies will communicate the anti-corruption policy, including various channels for reporting whistleblowing, complaints, or suggestions to both internal and external personnel, including subsidiaries, associated companies, other companies under the group's control, and business representatives. This will be done through various methods, such as orientation for directors and employees, the company website (www.ptenergy.co.th), and other appropriate channels, to create awareness and understanding in implementing this policy in a tangible manner. The details are as follows

1. The group of companies will post notices about the anti-corruption policy in clearly visible locations to ensure that everyone in the organization can easily access the information.
2. The group of companies will disseminate the anti-corruption policy through the company's communication channels, such as the company website, intranet system, and email.
3. The group of companies will provide training on the anti-corruption policy to all new employees.

Channels for Reporting Whistleblowing or Corruption Complaints

The group of companies has established channels for reporting whistleblowing and complaints regarding illegal activities, violations of ethical standards, incorrect financial reporting, or deficiencies in the internal control system. This is to enable stakeholders to participate more effectively in monitoring and safeguarding the interests of the group. The group has specified the channels for reporting whistleblowing or complaints from all stakeholder groups as follows



(Anti-Corruption Policy)

E-mail E-mail : whistleblower@pt.co.th

Regular Mail: Send to Secretary of the Board of Directors
PTG Energy Public Company Limited
90, CW Tower Building, 33rd Floor, Ratchadapisek Road,
Huai Khwang Sub-District, Huai Khwang District,
Bangkok 10310, Thailand

The matters related to whistleblower reports and complaints regarding corruption include

1. When witnessing acts of corruption that violate laws, regulations, rules, or ethical standards related to the group of companies.
2. When observing actions that deviate from the procedures established by the group of companies or that affect the internal control systems of the group, raising suspicions that they could be avenues for corruption, potentially harming the company's interests or affecting the reputation of the group.

The group of companies will conduct an investigation following established procedures and document the investigation in writing, ensuring the anonymity of the whistleblower. Additionally, they will keep the details of the complaint confidential and have clear measures in place to protect the whistleblower.

In cases where urgent issues need to be reported, directors, executives, employees, and relevant parties are required to inform senior management or the board of directors through the communication channels mentioned above. If there are any questions or suggestions regarding the anti-corruption policy, they can be contacted at the Corporate Governance department via email: cg@pt.co.th.

Furthermore, the group of companies will review the details and compliance with the anti-corruption policy at least once a year to ensure its appropriateness for the business operations of the group and to align with the legal standards that may be set at different time intervals.