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Policy

Anti-Corruption Policy

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Effective Date	2026-09-01
Process Owner	Governance

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<u>Revision</u>	<u>Author</u>	<u>Effective Date</u>	<u>Change Description</u>	<u>Ref. Doc no.</u>
03	apilarp_p	2026-09-01	The revised policy was approved by the Board of Directors at Meeting No. 2/2026, held on 26 August 2026.	BP-CSG-PO-002
02	thitirat_j	2026-07-31	According to Board Meeting 5/2024 on 29 May 2024 Board Approved the revision of Anti-Corruption Policy.	BP-CSG-PO-002

Approval Record		
<u>Approver</u>	<u>Job title</u>	<u>Date</u>
Sinon Vongkusolkiet	Chief Executive Officer	2026-08-28
Virach Vudhidhanaseth	Head of Corporate Secretary	2026-08-27

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Introduction:

The Company recognizes the importance of conducting business with integrity, honesty, and responsibility toward society, the environment, and all stakeholders. The Company is committed to operating with transparency, in compliance with applicable laws, ethical standards, and good corporate governance practices.

Accordingly, the Company has established this Anti-Corruption Policy to reflect its firm commitment to preventing and combating corruption and bribery in all forms. This policy serves as a guideline for operations consistent with “Committed”, one of the Company’s core values, its Corporate Governance Policy and Code of Conduct, the requirements of the Thai Private Sector Collective Action Against Corruption (CAC), as well as other relevant laws, rules, and regulations.

Objective:

To ensure that the Company has robust and effective anti-corruption measures in place by clearly defining authority, duties, and responsibilities, as well as establishing appropriate guidelines, practices, or operating procedures to prevent all forms of corruption across all of the Company’s business activities. This objective also aims to ensure that business decisions involving potential corruption risks are carefully reviewed and conducted with due diligence.

Scope:

This policy applies to directors, executives, and employees of the Company and its subsidiaries, including permanent employees, temporary employees, and contract employees, across all business units and operational sites. All individuals within the scope of this policy are required to strictly comply with the guidelines set forth herein.

Definitions:

- **“Corruption”** means any forms of bribery, whether by way of offering, promising to give, giving an undertaking, demanding, or accepting money, assets, or any other undue benefits to or from any government officer, government agency, private organization, or responsible person, either directly or indirectly, so that such person exercises his/her power or refrains from

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performing his/her duties, thereby causing the Company or any other person to obtain any undue benefits or business advantages.

- **"Recipient"** means any government officer or representative, private company officer, politician, trading party, customer, labor union, relevant stakeholder and any individual, who supervises or supports the supervision of or causes Company to derive any benefits, whether directly or indirectly.
- **"Employees"** means executives at all levels, employees, and workers of the Company and its subsidiaries, including permanent employees, temporary employees, and contract employees, across all business units and operational sites.
- **"Delegation of Authority"** means the list of authority that CEO has further delegated to executives at various levels for day-to-day operation in order to approve various types of transactions based on value thereof and levels of executives.
- **"Bribery"** means the offering, promising, giving, accepting or soliciting of an advantage, in any form, as an inducement for an action which is illegal or a breach of a person's fiduciary responsibilities.
- **"Gift Giving or Receiving"** refers to the act of offering or accepting items or any other benefits to or from external individuals or organizations at an appropriate value and on suitable occasions, in line with social customs and accepted practices. This includes the exchange of gifts during important local festivals or occasions, as well as for maintaining business relationships and demonstrating courtesy on various occasions, such as expressing congratulations, appreciation, or condolences.
- **"Hospitality"** refers to the provision of meals, beverages, or other related services, as well as the organization of recreational activities such as performances, entertainment, and sporting events, for the purpose of hosting or welcoming external individuals or organizations.
- **"Charitable Donation"** means the donation of money, goods, or other benefits to individuals or legal entities for the purpose of providing public benefit and/or demonstrating the Company's social responsibility and enhancing its corporate image, without seeking any improper business advantage or other inappropriate benefits.
- **"Sponsorship"** means financial support provided to or received from any individual or legal entity for business purposes, such as marketing promotion or reputation enhancement, where the objectives and outcomes cannot be clearly measured and/or monitored, and which may be linked to bribery.
- **"Political Contribution"** means financial or other forms of support, whether directly or indirectly, provided to support political activities, political parties, politicians, political candidates, or politically exposed persons.
- **"Government Official"** means any person who is an officer, employee, or advisor of a state enterprise or government agency, holding a permanent position or receiving a salary, and shall

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also include directors and subcommittee members of state enterprises.

- **“Facilitation Payment”** means an unofficial financial payment for an officer, representative or agency of a government sector with an intention to influence such person to carry out or expedite the procedures or facilitate their routine operations.
- **“Conflict of Interest”** refers to any situation or action in which the personal interests of directors, executives, employees, or related persons—whether directly or indirectly—conflict with the interests of the Company, and which may result in a lack of transparency in decision-making or prevent actions from being carried out in the best interests of the Company.

Policy Statement / Principles:

Principles and Guidelines

1 Directors, executives, and employees shall not engage in any form of corruption, whether directly or indirectly, or through any third party. They must perform their duties in compliance with all applicable laws, rules, and regulations relating to anti-corruption, both in Thailand and in all countries where the Company operates.

2 Directors, executives, and employees must refrain from the following actions:

- Soliciting or receiving bribes or any other benefits from external parties, whether in the public or private sector, that may improperly induce the performance or non-performance of their duties, result in a violation of the law, or cause damage to the Company’ s interests.
- Offering or giving bribes or any other benefits to external parties, whether in the public or private sector, in order to obtain an unfair business advantage or to improperly influence such persons to act or refrain from acting in a manner inconsistent with their duties or in violation of the law.

3 For business activities that involve a high risk of corruption, directors, executives, and employees must conduct their duties with transparency, due diligence, and caution, in accordance with the principles set forth in the Company’ s Corporate Governance Policy and Code of Conduct, which cover the following matters:

Giving or Receiving Gifts and Hospitality

- Directors, executives, and employees shall refrain from giving or receiving gifts, gratuities, hospitality, or any other benefits for the purpose of improperly inducing the performance or non-performance of duties, or influencing inappropriate business decisions.
- The giving or receiving of gifts, gratuities, hospitality, or other benefits in accordance with customary practices or on appropriate business occasions shall strictly comply with the

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guidelines stipulated in the Code of Conduct and the Standard Practice Manual for Accepting and Offering of Gifts, Hospitality, or Other Similar Forms of Reward.

Charitable Donations and Sponsorships

- Charitable donations and sponsorships must never be used as a pretext for bribery or as a means of obtaining improper business advantages.
- Charitable donations or sponsorships, whether in the form of cash or other assets, may be made in the name of the Company and must not exceed the amounts specified in the Delegation of Authority, unless prior written approval is obtained from the Chief Executive Officer.
- In this regard, the recipient organization or entity must be reputable, legally established with proper supporting documentation, and subject to traceability and verification to ensure that the donated assets or funds are not used for bribery or any corrupt purposes.

Political Contributions

- The Company maintains a position of political neutrality and shall not engage in or provide financial or other forms of support to political parties or politicians, whether directly or indirectly.
- Directors, executives, and employees retain the right and freedom to participate in political activities in accordance with constitutional provisions. However, they must strictly comply with the guidelines set forth in the Code of Conduct regarding the Exercise of Political Rights.

Revolving Door

- The Company shall not employ current government officials or former government officials in any positions that may give rise to conflicts of interest with the Company or violate applicable laws and regulations or for the purpose of obtaining improper business advantages.

Facilitation Payments

- The Company strictly prohibits the payment of facilitation payments to government officials under any circumstances.

4 Directors, executives, and employees shall avoid entering into transactions in which they have a personal interest that may give rise to a conflict of interest with the Company. In cases where such transactions are unavoidable, the Company shall ensure that they are conducted with transparency and fairness, and on terms equivalent to those of transactions with third parties. In the event that directors, executives, or employees become aware that they have or may have a conflict of interest, they must disclose such information transparently through the channels prescribed by the Company and refrain from participating in the consideration or decision-making process related to such matter.

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5 Directors, executives, and employees shall not neglect or disregard the obligation to report any acts that may constitute corruption through the channels specified by the Company under its Whistleblower Policy. The Company shall keep all information relating to complaints and investigations confidential and shall not disclose such information to unauthorized parties, except where disclosure is required by law.

6 The Company shall ensure fairness and provide protection to individuals who refuse to engage in corruption, whistleblowers who report corruption-related matters involving the Company, or those who cooperate in investigations. No personnel shall be demoted, sanctioned, or otherwise subjected to adverse consequences as a result of such actions, even if such actions may cause the Company to lose business opportunities.

7 In the event that directors, executives, or employees require advice, guidance, or clarification regarding whether any work-related action complies with the Anti-Corruption Policy, they are encouraged to contact the Company Governance Division.

8 The Company shall regularly conduct reviews and monitor compliance with the Anti-Corruption Policy, as well as consider allocating resources in an appropriate manner to support the implementation of various measures in accordance with the established anti-corruption policy and practices.

Communication of the Anti-Corruption Policy

1 The Company shall continuously provide communication and training activities on the Anti-Corruption Policy to directors, executives, and employees in order to promote awareness and understanding of the key principles of the policy. Such activities shall cover, among others: (1) forms of corruption and bribery; (2) guidelines for managing business activities with corruption risks; (3) complaint handling mechanisms; and (4) disciplinary measures and legal penalties. These activities shall be delivered through appropriate channels and incorporated into the orientation program for all new directors, executives, and employees.

2 The Company shall communicate the Anti-Corruption Policy to suppliers, agents, contractors, and any parties conducting business with or acting on behalf of the Company from the outset of the business relationship. The policy shall be integrated into the procurement process and communicated on other appropriate occasions thereafter, as deemed necessary.

3 The Company shall publicly disclose information relating to its Anti-Corruption Policy and related

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measures through appropriate channels, including publication on the Company’ s website, in its annual report, and through other suitable communication platforms.

Effective Anti-Corruption Mechanism

Corporate Governance Policy and Code of Conduct

- The Company has established a Corporate Governance Policy and Code of Conduct to serve as standards for its operations across all areas. These policies set out the principles and practices relating to anti-corruption that directors, executives, and employees are expected to uphold. The Company regularly reviews and updates these policies to ensure alignment with the evolving business environment, internationally recognized corporate governance standards, and applicable laws and regulations.
- In addition, the Company continuously communicates the key principles outlined in the Corporate Governance Policy and Code of Conduct. These principles are incorporated into the orientation program for all new employees. The Company has also established a process to monitor and assess compliance with these policies on an annual basis, under the oversight of the Corporate Governance and Nomination Committee.

Procurement Policy and Related Procedures

- All procurement activities and engagements with external parties, whether in the public or private sector and whether domestic or international, must be conducted transparently, be auditable, and comply with all applicable rules and regulations.
- The Company has established a Procurement Policy and related procedures to control and govern purchasing requisition and order placement, billing and collection of payments for goods and services, claims and return of goods and services, imported goods, bidding and tendering, logistic management, and goods procurement. All procurement activities are conducted through designated systems that ensure proper recordkeeping, enabling traceability, reference, and auditability at every stage of the procurement process.

Accounting and Record-Keeping System

- The Company’ s consolidated financial statements and separate financial statements are prepared in accordance with Thai Financial Reporting Standards (TFRS), which are largely aligned with International Financial Reporting Standards (IFRS), and duly approved by the Federation of Accounting Professions. In addition, the preparation of the financial statements complies with the regulations of the Securities and Exchange Commission (SEC).

Corporate Compliance Policy

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- The Company has established a Corporate Compliance Policy, a compliance governance manual, and a Compliance Obligation List (COL) as tools for self-assessment of legal compliance. These tools support the Company's functions and business units in ensuring adherence to applicable laws, rules, regulations, internal and external standards, as well as relevant guidelines. The compliance framework is regularly updated to reflect changes issued by regulatory authorities, as appropriate.

Assessment and Prevention of Corruption Risks in the Business

- The Company conducts corruption risk assessments across all business groups, including both operational and support functions. Corruption risk factors are identified and categorized based on the nature of business activities, together with an assessment of their potential causes and likelihood. Measures implemented to manage and mitigate such risks are evaluated at least annually to ensure their effectiveness and continued relevance.

Internal Control System

- The Board of Directors has assigned the Audit Committee to review and assess the adequacy and appropriateness of the Company's internal control system related to risk management, in order to ensure effective, efficient, and transparent business operations.
- The Company's internal control system is reviewed in accordance with international standards, namely the COSO Framework (Committee of Sponsoring Organizations of the Treadway Commission). This framework emphasizes commitment to integrity and ethical value, the board responsibility, organization structure and authority, employees' commitment to competency and accountability, business and corruption risk assessment, communication, and control-monitor-report procedures.

Human Resources Management System

- The Company has established human resources policies and processes that reflect its strong commitment to anti-corruption principles, covering recruitment and selection, training and development, performance evaluation, compensation, and promotion. All such practices are aligned with the principles set forth in the Code of Conduct.

Corrective Measures

Corporate Fraud Management

- Any issues or situations related to corruption that are reported through the whistleblowing channels or identified through internal audit findings shall be processed under the Company's Corporate Fraud Management Policy. An Investigation Committee shall be appointed to collect

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relevant information, conduct fact-finding investigations, and prepare investigation reports together with recommendations. These reports shall then be submitted to the Chief Executive Officer and/or relevant senior executives for review and determination of appropriate further actions.

Monitoring and Reporting

- All corporate governance related complaints, including cases involving corruption, shall be consolidated and reported to the Corporate Governance and Nomination Committee on a quarterly basis, and subsequently submitted to the Board of Directors for acknowledgment.
- In addition, the Internal Audit Function shall report the results of investigations and follow-up actions for each case to the Audit Committee, ensuring oversight, transparency, and accountability in the handling of corruption-related matters.

Enforcement and Disciplinary Actions

- Directors, executives, and employees who violate compliance with this policy shall be subject to disciplinary action in accordance with the Company's regulations and may also be subject to legal penalties if such misconduct constitutes a violation of the law.
- The Company's Work Rules stipulate that corruption is considered a serious disciplinary offense. The maximum penalty is termination of employment or dismissal.
- Any person or entity associated with the Company, such as suppliers, business representatives, contractors, or anyone acting on behalf of the Company, who violates this policy may cause the Company to terminate its business relationship or contractual engagement with such person or entity.

Policy Review

- The Company requires that the Anti-Corruption Policy and related guidelines be reviewed at least once a year, or when there are changes in relevant laws, regulations, or requirements, as well as to ensure alignment with good corporate governance principles and evolving business environments. A designated subcommittee shall be responsible for reviewing the policy and proposing it to the Board of Directors for consideration and approval.

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Responsibility:

- **The Board of Directors** is responsible for establishing and approving the Anti-Corruption Policy, overseeing the implementation of effective anti-corruption systems within the organization, and ensuring that management recognizes the importance of anti-corruption commitment, drives the execution of the policy, and fosters anti-corruption practices as part of the Company' s organizational culture.
- **The Corporate Governance and Nomination Committee** is responsible for reviewing the Anti-Corruption Policy, the Code of Conduct, and other related guidelines to ensure alignment with good corporate governance principles, prior to submission to the Board of Directors for approval. The Committee shall also oversee and monitor the handling of corporate governance related complaints on a quarterly basis.
- **The Audit Committee** is responsible for overseeing and reviewing compliance with the Anti-Corruption Policy, as well as the Company' s financial reporting and accounting systems, internal control system, internal audit function, and risk management system, to ensure that they meet international standards and are adequate, appropriate, up-to-date, and effective.
- **The Chief Executive Officer** is responsible for ensuring that corruption risk assessments are conducted for business activities that may give rise to corruption, establishing processes to promote and support the Anti-Corruption Policy, and communicating the policy to executives, employees, and all stakeholder groups. The Chief Executive Officer shall also review the adequacy of relevant processes and measures to ensure alignment with changes in business operations, rules, regulations, and legal requirements.
- **The Internal Audit** is responsible for reviewing the Company' s internal control system, as well as compliance with policies and practices related to anti-corruption. This is to ensure that the Company maintains adequate, effective, and appropriate internal controls commensurate with potential corruption risks. The function shall report audit results and any urgent findings to the Audit Committee and relevant senior management in a timely and regular manner.
- **The Enterprise Risk Management** is responsible for identifying, assessing, and reviewing corruption risks associated with the Company' s business operations on an annual basis, and for reporting such risks to the Risk Management Committee and the Audit Committee.
- **All directors, executives, and employees** are responsible for studying, understanding, and strictly complying with this policy. They must avoid any actions that may lead to violations of the policy, communicate the policy to external stakeholders, and actively monitor, prevent, and report any observed or suspected acts of corruption.

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References:

N/A