



EGCO Engineering & Service Company Limited

Anti-Corruption Guideline

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The Managing Director's message

EGGO Engineering & service Co.,Ltd. gives importance to a transparent and ethical business operation, following the Good Corporate Governance Principles. The Company always believes that this conduction will be a path leading to a truly sustainable growth.

Upholding such, the Company establishes the Anti-corruption Guideline to direct the personnel's practices, aiming to maintain the transparent business operation. Anti-corruption Policy and Guideline are also relayed to business partners and public in order to be clear on the Company's standpoint and encourage business partners to advance on similar paths, following the Company's expression of **“Corruption is an unacceptable act in our business conduct whether it will be with the government or the private sector”**.

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

This guideline shall be effective on Sep 16, 2021.

Announced on Sep 20, 2021.



(Mr. Sathit Tanomkul)
Managing Director

Terms and definitions

“The Company” means EGCO Engineering & Service Company Limited or ESCO.

“Personnel” means directors, the Managing Director, executives, officers at all levels and all kinds of employees acting as the Company’s Personnel.

“ Management” means the Managing Director and Division Managers.Senior Executive Vice Presidents.

“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 personal or the Company’s 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 Guideline

In order for the Personnel to fully understand and comply with the Anti-corruption Policy, the Company established the Anti-corruption Guideline as follows:

1. Bribe and Facilitation Payment

The Personnel must not allocate, offer, promise, commit, accept, or request direct or indirect bribes and facilitation payments to/from 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.

2. Allocating Donation and Support

The Company allows for a donation and support that is reasonable and appropriate to the event. However, to ensure that such donation and support will not be used as an indirect bribe for favors on a contract or an approval of the government's project, biased decisions on tax or customs benefits or other kinds of undeserved business advantages, the following guidelines are established in accordance with the Internal Audit control:

- 2.1 Donations and supports must be in line with the Company's policy.
- 2.2 The amount of money or items of the donation or support, valid purposes, a specific time frame of the activity, as well as names of people, agencies or organizations requesting for the donation or support for such stated purposes must be specified.
- 2.3 There must be a documented evidence after the donation is accepted such as a receipt or other types of legitimate evidence such as a Thank You letter, news, photo, etc.
- 2.4 Donations and supports must be approved by the authorized person according to the Company's Table of Authority or regulation.

3. Receiving Donation and Support

It is not the Company's policy to accept money or any forms of donations or supports from a client, supplier, partner, or others in any government and private sectors for any purposes whatsoever.

4. Political Support

The Company has the following guidelines:

- 4.1 The Company shall remain politically neutral and not extend any direct or indirect assistance to any political parties, networks, influencers, or candidates.
- 4.2 The Personnel are entitled to their civil rights and duties to voluntarily participate or support any political activities, provided that it does not cause any intrusion upon the Company's assets and time.
- 4.3 The Personnel are prohibited to use their position to influence, urge or demand their subordinates or colleagues to support any political activities directly and indirectly whether for the Company's or personal benefits.

5. Offering Business Gift and Entertaining Arrangement

The Company allows for the Personnel to offer business gifts and entertaining arrangements to its business partners, with a compliance with the following guidelines:

- 5.1 Gifts and entertaining arrangements shall be for a traditional occasion and social manner, consistent with the Company's Code of Conduct and rules and regulations, and legally approved.
- 5.2 Gifts and entertaining arrangements shall aim to maintain good business relationships and not for any undeserved favors or business advantages in return.
- 5.3 The allocation must be transparently done, following the approval procedures of the Company, and recorded truthfully with a documented evidence.
- 5.4 Gifts to be given should be able to promote the Company's public relations and enhance the receiver's perception of the Company, such as calendar, diary, etc. Gifts can also be a product from local communities nearby a power plant or a product that gives back to charity or public benefit. The expenses for entertaining arrangements must be reasonable and appropriate for the occasion.

6. Receiving Business Gift, Entertaining Arrangement and Discount from Business Partners

6.1 Guidelines to receive business gifts:

- 1) The Personnel shall cooperate and refrain from accepting any gifts, except for the following that are allowed to be received:

- 1.1 Calendar, diary, or other types of public relations promoting gifts.
 - 1.2 Gifts from lucky draws that do not have a specific receiver.
 - 1.3 Souvenirs from attending an event.
 - 1.4 Prizes from a contest or competition.
- 2) If gifts cannot be avoided, the Personnel shall report to the following to consider gathering the gifts for a donation to the charity or public benefit:
 - The President if the Personnel is a direct subordinate of the President, or
 - An Executive Vice President if the Personnel is a Senior Vice President or a lower position.
 - 3) Expiring gifts shall be under the consideration of the immediate supervisor, except for alcoholic drinks that the Personnel shall follow item 2) above.

6.2 Guidelines to receive entertaining arrangements:

- 1) The arrangement shall be for a traditional occasion and social manner, consistent with the Company's Code of Conduct and rules and regulations, and legally approved.
- 2) The arrangement shall aim to maintain good business relationships. The Personnel shall not give an undeserved favors or business advantages in return.
- 3) The arrangement must be transparently done, with a recorded invitation and approved by the supervisor.
- 4) The Personnel must not request for any entertaining arrangements.

6.3 Guidelines to receive discounts or promotional gifts from business partners:

Discounts from business partners, in forms of money or other valuables, and other promotional gifts can be accepted at business-to-business level and in relation to the business conditions, without any benefits for the Company or undeserved personal favors. The documented evidence must also be recorded.

7. Human Resource Management

The qualifications and responsibilities of the directors, as well as recruitment, appointment, termination, and remuneration of the directors must comply with the Company's Articles of Association. The qualifications, recruitment, employment, appointment, and rotation, as well as wages, traveling expenses, performance assessment, petition and termination of the Managing director, executives,

officers, and employees must follow the Company's Regulation on Human Resources Management or other similar documents.

8. Employment of Public-sector Employee

The Company allows an appointment or employment of a Public-sector Employee as the Company's directors, the President, executives, officers, and other employees. The Company is well aware that such employment might lead to the use of relationship or insider information for the Company's benefit which is deemed a conflict of interest and a malpractice of the government officer for an undeserved business advantage. Therefore, in a prevention of such, the employment of Public-sector Employees must follow the guidelines below:

- 8.1 The recruitment, appointment and wage determination of Public-sector Employees must be done in a transparent manner and not for any undeserved personal favors or business advantages.
- 8.2 The candidate's profile must be thoroughly explored before the employment or appointment in order to review potential conflicts of interest.
- 8.3 The profile of the directors who are a current or former officer in government agencies or state enterprises must be disclosed in the Company's publications as required by law.
- 8.4 The Personnel who are a current or former Public-sector Employees must follow the Company's Conflict of Interest Policy and Guideline strictly. Directors, executives, and employees must not participate in or receive any information regarding the activity in which they have a direct or indirect conflict of interest.

9. Investment and Trade

The Company is committed to make investments in a fair competition and conduct business following the Good Corporate Governance Principles. Plus, the Company's Table of Authority is applied to all investments.

The Company is determined to conduct a fair trade and ethically treat business partners as directed by the Code of Conduct. It is not the Company's policy to request or accept, offer or grant financial benefits or any forms of rewards to officers or agencies in exchange for an undeserved privilege, unfair business contract or unethically special treatment.

10. Procurement

The Company commits itself to transparent and fair procurement practices. A procurement request must be proposed to the authorized persons as per the Company's Table of Authority, Regulation on Procurement and Advisor Engagement and other similar documents. Furthermore, to comply with the Conflict of Interest Policy and Guideline, the Personnel who have a personal interest with a supplier must not participate in or receive any information regarding the procurement in which they have a direct or indirect conflict of interest.

It is not the Company's policy to accept or request, grant or offer financial or any forms of compensation to its suppliers or service providers in return for being shortlisted or a benefit in commodities or merchandises

11. Accounting and Finance

Following is the guidelines for cash collection or payment:

11.1 Cash collection from customers, companies or other individuals

- 1) All cash received must follow the terms of the business contract and must always be reconciled with the accounting record. Receipts must be issued as an evidence by the finance unit.
- 2) The Personnel must not grant, offer, accept, or request for financial benefits or any forms of compensation from the debtor so as to delay the due date, decrease the debt amount for the debtor, to request the debtor to make payment earlier than due date, or other actions that would negatively impact the Company.

11.2 Cash payment to creditors, companies, or other individuals

- 1) All cash payments must be reviewed and recorded by the accounting unit to ensure that they are correct and aligned with terms of the business contract. Should there be any inappropriate transactions, the Personnel shall notify the supervisor to determine precautions and correction measures that are in line with accounting principles and laws.
- 2) All payments must be approved by the authorized persons in each level following the Company's Table of Authority. A payment evidence in accordance with relevant laws must be recorded.
- 3) The Personnel shall treat all creditors or payees equally and make payments according to the appropriate business term. There shall not be biases or discrimination against any.

- 4) The Personnel must not grant, offer, accept, or request for undeserved financial benefits or other forms of reward from creditors or payees so as to expedite the Company's payment, request for a delayed due date, or other actions that would negatively impact the Company.

12. Acquisition and Provision of Loans and Engagement in Liabilities

The Company's Table of Authority and Regulation on Accounting, Finance and Budgeting outline steps and processes in taking loans, lending money, and committing liabilities between the Company and another party.

It is not the Company's policy to accept or request, grant or offer financial benefits or other forms of rewards in exchange for an undeserved privilege on a loan contract or for undeserved or unethical dissolution of liabilities engaged by the Company.

13. Prevention Measures Against Money Laundering

To prevent illegal transfer, concealment, or disguise of assets through the Company's business activities, the Company shall not take in possession or support the possession of assets from conversion or assignment involved in illegal dealings as stated in Anti-Money Laundering Act.

14. Filing and Documentation

It is the Company's policy to comply with all procedures, measures, rules and regulations relating to accounting and finance disclosure. The Company does not allow any untruthful, incorrect, or falsified accounting items and there shall not be a secret or hidden entry to support or cover up corruption.

The Company has set a secure information system where all documents, records and financial reports are categorized and kept respectively, accessible, and available for inspection. Information kept in electronic means can be accessed by authorized persons only.

15. Communication, Training and Information Disclosure

The Company utilizes all tools to constantly communicate to both internal and external parties about the Anti-corruption Policy and Guideline, as well as whistleblowing channels and related information.

As for the Company's Personnel, the communication to encourage an actual practice is provided through orientations for new directors and employees, company's trainings or events, Communication Day with the Managing Director, as well as announcements on bulletin board and internal website (ESCO Groupnet), etc.

As for business allies, namely, , business partners, suppliers, customers and other business related parties, the Company communicates the Anti-corruption Policy and Guideline upon business dealing and later through Supplier Day or whichever occasions deemed appropriate. They are also encouraged to adopt the Company's Anti-corruption Policy and Guideline.

The Company also discloses the Anti-corruption Policy and Guideline on its public website and other publications for the shareholders, other stakeholders and public as well.

16. Internal Audit / Control System

Internal audit is carried out annually by the Company's Internal Audit Division who has full independence and authority in their scope of work. The Internal Audit Division reviews activities by upholding the Table of Authority, related orders, as well as the Anti-corruption Policy and Guideline. In addition, the Company's accounting is quarterly audited by the licensed auditors as per stated by Department of Business Development and Revenue Department.

The Company sets the following guidelines for the audit report:

- 16.1 The Internal Audit Division of Electricity Public Company Limited shall report the result and issues found to the Audit Committee of Electricity Public Company Limited at least once every quarter.
- 16.2 Should an urgent matter be found, the Internal Audit Division of Electricity Public Company Limited shall notify the Chairman of the Audit Committee directly.
- 16.3 The Audit Committee of Electricity Public Company Limited is responsible for proposing the audit report to the Board of Directors.

17. Monitor and Review Processes

The Company is committed to monitor the compliance with the Anti-corruption Policy and Guideline on a regular basis through internal audit by the Internal Audit Division of Electricity Public Company Limited. In addition, corruption risk assessment is carried out by the Anti-corruption Working Team in

order to determine mitigation measures and review yearly to propose to the authorized persons in case of any revisions.

The Anti-corruption Working Team is also responsible for reviewing the Anti-corruption Policy and Guideline on a yearly basis before proposing to the authorized persons in case of any revisions.

18. Whistleblowing

The Company establishes the following guidelines to encourage its Personnel, stakeholders and other related parties to notify the Company regarding potential corruption, misconduct, or suspicious course of action relating to money laundering, doubtful accounting and finance as well as internal control and audit.

18.1 Report Receiver

- Head of the Anti-Corruption Working Team, Human Resource section Manager and Secretary of the Anti-Corruption Working Team Managing Director and Chairman

18.2 Whistleblowing Channel

Whistleblowers can submit the information or [Whistleblowing Form \(Attachment 1\)](#) via the following 3 channels:

Channel 1: The Company's public website: <https://www.egco-engineering.com/2020/th/whistle-blowing>

Channel 2: Email sent to one of the Report Receivers:

- Head of the Anti-Corruption Working Team , Human Resource section Manager and Secretary of the Anti-Corruption Working Team :
escoanticorruption@egco.com
- Managing Director and Chairman : escodirectors@egco.com

Channel 3: Post sent to one of the Report Receivers and the following address:

EGCO Engineering & Service Company Limited
222 Vibhavadi Rangsit Rd.,
Tungsonghong, Laksi, Bangkok
10210

18.3 Whistleblower's identity and details

The whistleblower should identify themselves and provide contact information for the Company to inquire, contact and inform the result of consideration of the report. In case that the whistleblower wishes to stay anonymous, details or related evidence of such report should be sufficient for the Company to conduct further fact finding, and the Company may pursue the investigation if deemed well-grounded.

18.4 Whistleblowing Handling Process

1) Registration of Report

After the report is received, the Report Receiver shall submit it Secretary of the Anti-Corruption Working Team for registration. The registration number shall be used to refer to such report for the purpose of whistleblower protection.

2) Preliminary Review

Head of the Anti-Corruption Working Team and Human Resource section Manager shall preliminarily review the report and consider if the evidence is sufficient, clear, and well-grounded for further investigation. All reports shall be reviewed whether the whistleblower's identity was specified or not (anonymous whistleblowing) and Head of the Anti-Corruption Working Team shall provide one of the following suggestions.

2.1 There is not sufficient, clear, or well-grounded evidence to conduct further investigation.

2.2 The report should be further investigated by the designated investigation division / committee.

3) Investigation

3.1 General Report

3.1.1 Head of the Anti-Corruption Working Team shall propose the report with its suggestion to the Managing Director for consideration and to the Report Receiver for acknowledgement. The Managing Director may consider appointing the investigation division / committee based on the report. The immediate supervisor or project manager supervising the alleged shall not participate in the investigation division / committee unless requested for testimony.

- 3.1.2 Secretary of the Anti-Corruption Working Team shall inform the whistleblower regarding the reception of the report and the registration number for progress update.
- 3.1.3 The investigation division / committee shall investigate, conclude, and provide suggestions regarding correction and prevention measures as well as disciplinary actions that the Personnel who commit corruption acts shall be subjected to. This Process shall be completed within 1 month after receiving the report or within the extended period, which can be requested for 1 month/time.
- 3.1.4 The investigation division / committee shall inform the result of investigation, correction and prevention measures, and disciplinary actions to the Internal Audit Division
- 3.1.5 Head of the Anti-Corruption Working Team shall propose to the Managing Director for consideration and to the Report Receiver for acknowledgement.
- 3.2 Report on directors, the Managing Director, or the direct subordinates of the President.
- 3.2.1 Head of the Anti-Corruption Working Team and Human Resource section Manager shall propose the report with its suggestion to the Report Receiver (not including the Managing Director) to consider appointing the investigation division / committee based on the report. The immediate supervisor of the alleged shall not participate in the investigation division / committee unless requested for testimony.
- 3.2.2 Secretary of the Anti-Corruption Working Team inform the whistleblower regarding the reception of the report and the registration number for progress update.
- 3.2.3 The investigation division / committee shall investigate, conclude, and provide suggestions regarding correction and prevention measures as well as disciplinary actions that the Personnel who commit corruption acts shall be subjected to. This Process shall be completed within 1 month after receiving the report or within the extended period, which can be requested for 1 month/time.
- 3.2.4 The investigation division / committee shall inform the result of investigation, correction and prevention measures, and disciplinary actions to the Internal Audit Division

3.2.5 Head of the Anti-Corruption Working Team shall propose to the Chairman for consideration and to the Report Receiver for acknowledgement.

4) Informing to the Whistleblower

Head of the Anti-Corruption Working Team shall inform the whistleblower the result of investigation and the Company's course of actions as soon as applicable. However, if the investigation cannot be completed by specified period, the whistleblower will be informed if there are any updates.

5) Reporting to the Board of Directors

The Report Receiver shall report the whistleblowing to the Board of Directors. The Corporate Secretary Division shall gather information and propose to the Board of Director for approval of disclosure in the Annual Report.

18.5 Protection of the whistleblower and the alleged

For confidentiality and prevention of adverse consequences for related parties, the Company shall keep the whistleblower's information and the whistleblowing report, as well as the information of the alleged and fact finding, confidential and restrict the access to such information on a need-to-know basis except the disclosure is required by law. The investigation shall be a fair trial and the alleged shall be given an opportunity to testify and informed the result of investigation.

The Company shall uphold justice and protect the Personnel who refuse corruption, whistleblower and those who cooperate with the investigation. No Personnel shall be demoted, punished or given adverse consequences as a result of such action.

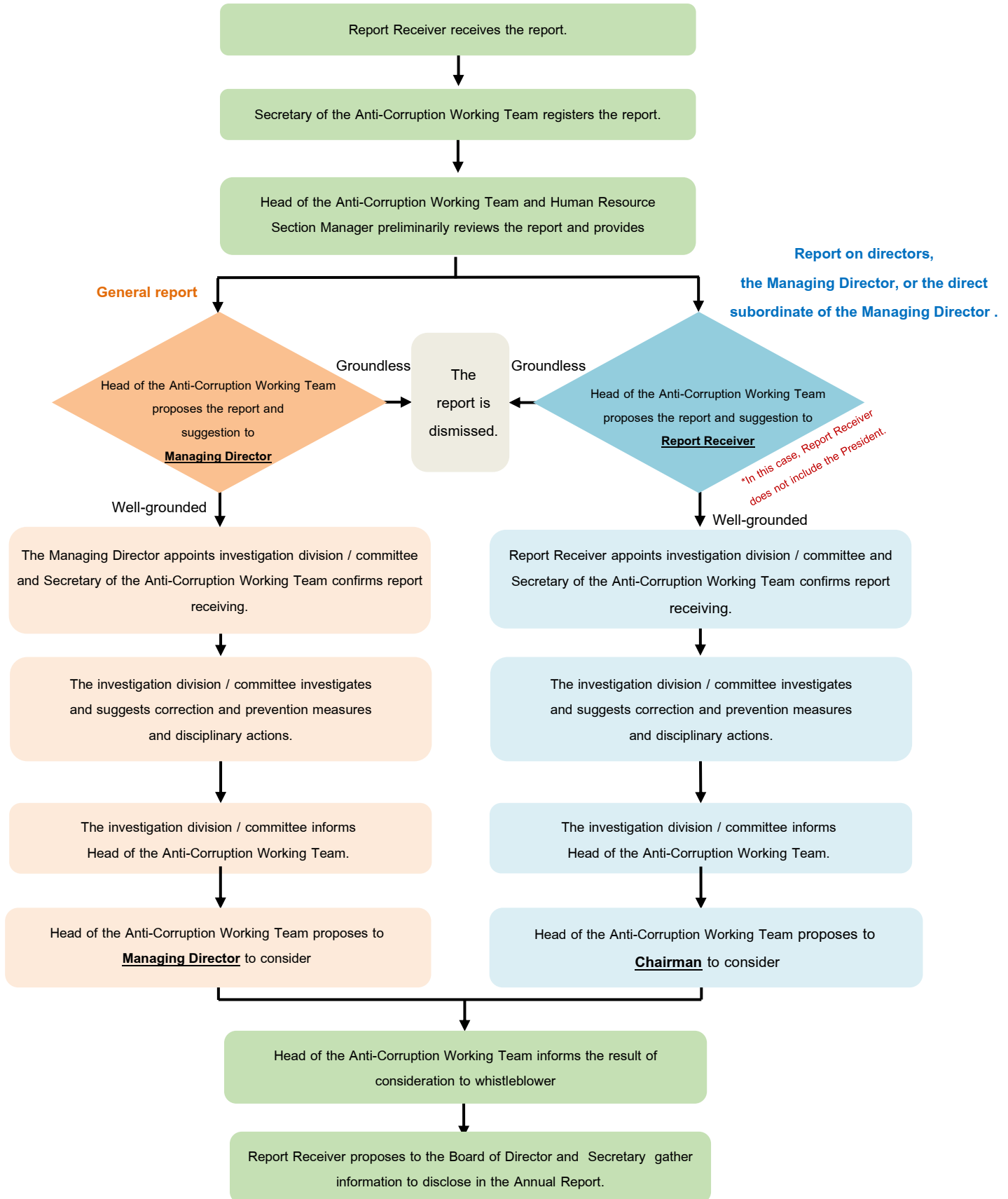
In addition, the Report Receiver shall set measures to protect the whistleblower, witness and informant from negative effects, troubles and danger, or unfair treatment resulted from reporting the whistleblowing, witnessing and giving information. Those causing troubles to the whistleblower or having bad intentions in revealing the whistleblower's identity shall be proposed to disciplinary actions.

18.6 Issuing disciplinary action

If the alleged is found guilty, the investigation division / committee shall provide a suggestion on the disciplinary actions that the Personnel who commit corruption acts shall be subjected to, which are issuing a warning letter, putting on probation, suspension from work, and dismissal and/or legal punishment. The Internal Audit shall propose to the President or to the Report Receiver to consult with the authorized person prescribed in the Table of Authority for considering such disciplinary action.

If the whistleblower has a bad intention and makes a false allegation, they will not be protected under the above principles and shall be subjected to a disciplinary action or legal proceeding.

Whistleblowing Procedure



Whistleblowing Form

Name-Surname of the whistleblower	
Department	
Email	
Telephone Number	
Date of acknowledgement of the matter	
Location of the misconduct	
Involved division(s)	
Person(s) involved in the misconduct	1 2 3 4 5
Details of the matter	

Remark(s):

- Please attach evidence or related details (if any)
- The whistleblower should identify themselves and provide contact information for the Company to inquire, contact and inform the result of consideration on the report. In case that the whistleblower wishes to stay anonymous, details or related evidence of such report should be sufficient for the Company to conduct further fact finding, and the Company may pursue the investigation if deemed well-grounded.
- The whistleblower will be informed of the progress within the time frame stated in the Whistleblowing Guideline.
- The whistleblower who intentionally reports false information to sabotage another party's integrity or reputation will be subject to disciplinary actions or penalized by law.