



Electricity Generating Public Company Limited

Whistleblowing Policy



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1. Rationale

In order for Electricity Generating Public Company Limited or EGCO to conduct business following the Good Corporate Governance Principles and have an appropriate internal control in line with EGCO's policies, the Board of Directors establishes the Whistleblowing Policy to guide the consideration and management of complaints and to provide fair protection for related parties in the whistleblowing process.

2. Objectives

- 2.1 To encourage a transparent and verifiable business operation, that is in compliance with law, rules, regulations, Good Corporate Governance Principles, Business Ethics, or Supplier Code of Conduct and to prevent risks that might occur to EGCO and its stakeholders.
- 2.2 To establish a channel for whistleblowing with regard to fraud and act against law, rules, notice, regulations, Good Corporate Governance Principles, Business Ethics or Supplier Code of Conduct of EGCO, as well as any human rights violation, discrimination, and harassment that occur to EGCO's stakeholders. This channel also supports opinions or recommendations from stakeholders who are affected or at risk of being affected by EGCO's business operation.
- 2.3 To establish clear guidelines of appropriate and fair complaint handling process and to protect the honest whistleblower, person cooperating with investigation, or the alleged party from adverse consequences as a result of such complaint.

3. Definition

“EGCO” means Electricity Generating Public Company Limited.

- “EGCO Group”** means Electricity Generating Public Company Limited, subsidiaries, joint ventures, and associates.
- “Subsidiaries”** means entities both in Thailand and overseas under the controlling power of EGCO.
- “Joint Ventures”** means entities that EGCO or subsidiaries invest and gain the joint control depending on contractual rights and obligations with partner(s) aside from legal structure of the joint arrangement. Investment in joint ventures is solely accounted for equity method for consolidated financial statement.
- “Associates”** means entities on which EGCO has a significant influence but has no rights for controlling power or has a joint control over investment. Investment in the associates is solely accounted for equity method for consolidated financial statement.
- “Personnel”** means directors, the President, executives, officers at all levels and all kinds of employees acting as EGCO Group’s Personnel.
- “Fraud”** means committing an act in order to procure any advantage for oneself or another person, to which they are not entitled by law. Fraud also includes corruption, asset misappropriation, embezzlement, and financial statement fraud.
- “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 benefit.
- 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.

4. Scope of Application

- 4.1 This Policy shall be applied to EGCO and Subsidiaries' Personnel at all levels.
- 4.2 In case the alleged is Joint Ventures or Associates' Personnel and the Joint Ventures or Associates have its own whistleblowing policy, the process shall comply with such policy. However, in case the Joint Ventures or Associates do not have its whistleblowing policy, EGCO encourage that this Policy be applied to the extent that it is not contrary to laws of Joint Ventures or Associates' country of residence.

5. Whistleblowing Policy

5.1 Scope of Complaint

EGCO Group's Personnel or third parties can submit a complaint to EGCO if they witness, possess information of or are affected by EGCO's business operation that involves one of the following:

- (1) Fraud or actions considered as a potential Fraud.
- (2) Noncompliance with laws, rules, regulations, Good Corporate Governance Principles, Business Ethics or Supplier Code of Conduct.
- (3) Violation of human rights, discrimination, and harassment in terms of sexual abuse, racial discrimination, and any other forms which affected all stakeholders and vulnerable group i.e., children, disabled, elderly, pregnant women, LGBTQ, ethnic minorities, natives, immigrants, etc.

The request from external organizations or parties for a clarification of certain matters shall not be included in the scope of the Whistleblowing Policy. Instead, it shall be under the responsibility of the divisions designated by the Company's Information Disclosure Policy and Practice Guidelines.

5.2 Whistleblowing Channels

Whistleblowers can submit a complaint via the following channels:

- (1) The Company's website: <https://www.egco.com/en/whistle-blowing>
- (2) Email sent to one of the whistleblowing complaint receivers:
 - The President ceo@egco.com
 - The Audit Committee auditcommittee@egco.com
 - The Board of Directors directors@egco.com
- (3) Post sent to the President, the Audit Committee or the Board of Directors to the following address:

Electricity Generating Public Company Limited
EGCO Tower 222 Vibhavadi Rangsit Rd.,
Tungsonghong, Laksi, Bangkok, Thailand, 10210

5.3 Details of Complaints

- (1) Information of the whistleblower, i.e., first name and last name, contact information, etc.
- (2) Information of the alleged, i.e., first name and last name, position, etc.
- (3) Submission date
- (4) Detailed information of the complaint, i.e., date, time, place, and incident.
- (5) Evidence relevant to the complaint (if any)

If the whistleblower discloses his/her contact information, it shall enable EGCO to effectively inquire further information and the whistleblower shall be kept updated of the whistleblowing handling process or the result of investigation and the Company's course of actions. However, in case the whistleblower chooses to remain anonymous, the complaint should provide detailed information or evidence which is clear and sufficient for EGCO to conduct further fact-finding. EGCO may consider investigating the complaint which has reasonable ground to believe that it is the action stated in article 5.1.

5.4 Whistleblowing Handling Process

EGCO commits to processing whistleblower complaint with transparency and justice. The consideration, investigation and determination of penalties will be in accordance with the Whistleblowing Guideline, the Company's Regulation on Human Resources Management, as well as rules, regulations, and any relevant laws.

5.5 Protection of Whistleblower, the Alleged and Related Parties

EGCO shall suitably and fairly protect the whistleblower or persons cooperating with investigation. No Personnel shall be demoted, punished, or given retaliation or unfair acts. Their complaints shall be kept confidential and not disclosed to unrelated parties except when required by law. In addition, EGCO will also protect the alleged who is not yet proven guilty by providing a fair trial.

5.6 Penalties for Dishonest Whistleblower

If there is sufficient evidence that the whistleblower has intentionally filed the complaint by false statement, lacking truthful ground, or with dishonest intent to the alleged and related parties, EGCO shall consider taking disciplinary actions and/or legal proceedings.

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

This policy shall be effective on November 25, 2021.

Announced on November 26, 2021.



(Mr. Kulit Sombatsiri)

Chairman