# WHISTLEBLOWING AND COMPLAINTS HANDLING POLICY

## Principle

For Global Power Synergy Public Company Limited or "GPSC" to maintain appropriate internal control in accordance with the Company's anti-fraud and corruption measures including applicable laws, GPSC has revised this policy to serve as a guideline for handling GPSC's whistleblowing and complaint. Apart from designating responsible units, this policy also establishes procedures for the screening of complaints, investigation processes, and decision-making processes in order to ensure precise measures for the fraud and corruption prevention. The Company has defined procedures, processes, and operational approaches to be applied as standardized practices.

## Objectives

1) To ensure that the operation of the Company and its subsidiaries is more efficient and aligned with Corporate Governance Principles.
2) To enable the Company's personnel and related external parties to carry out operations accurately, transparently, fairly, and accountably in accordance with laws, rules, regulations, as well as the Company's Corporate Governance and Code of Conduct.
3) To prevent risks and any potential damage to all stakeholders; and to provide fair protection to individuals who provide information of suspicious cases in good faith.

## Section 1: General Information

### 1.1 Definitions

**"The Company"** refers to the entities within the scope of application of this policy, including:

1) Global Power Synergy Public Company Limited (GPSC)
2) Glow Group
3) GPSC Treasury Center Company Limited (GPSCTC)
4) Companies in which the GPSC Group holds shares and whose operations are supervised by personnel of GPSC or companies within the group from 1) – 3) under a Shared Services Agreement.

**"Personnel"** means Directors, executives, and all levels of employees including probationers, contract employees and project contract employees of the Company as well as the secondment executives or employees.

**"PTT"** means PTT Public Company Limited.

**"Whistleblowing"** means a complaint regarding misconduct as specified in the whistleblowing and Complaint handling policy.

**"Misconduct"** means the violation of or non-compliance with laws, rules, regulations, orders, notifications of the Company and its subsidiaries and joint ventures, which also includes fraudulent or illegal exploitation of interests for oneself or others.

**"Fraud"** means any action or behavior performed to gain themselves or others benefit illegally including:

1. **Asset Misappropriation** refers to possessing of others' assets or co-assets and misappropriating the assets dishonestly to one's own or the third party.
2. **Embezzlement** refers to deceiving someone with deliberate, false representation of a fact or concealment of information from the knowledge from the other party for asset gain from the deceived person or the third party. Generally, a fact or information shall be revealed clearly. Such deception deprives assets from the deceived person or the third party or induces the deceived person or the third party to execute, revoke or destroy any document of rights.

3. **Financial Statement Fraud** refers to deliberate alteration of accounting data by taking advantage of loopholes of accounting principles or other valuation alternatives or intentional misrepresentation of accounting information with a purpose to alter financial statements to create a false impression of a company's financial health.
4. **Corruption** refers to any conducts ranging from giving, offering, committing, promising to give or receive to accepting or requesting money, assets or other benefits. Such can be private-to-private and/or by government officials in Thailand and/or government officials in other countries and/or officials of international organizations as well as those performing related duties. Such conducts influence such person to execute or abstain from duty either directly or indirectly, leading to acquisition or preservation of any inappropriate businesses or gains. However, allowances by laws, regulations, announcements, articles, traditional customs or trade norms are acceptable.

## 1.2 Whistleblowing Channels

- Mailing Address : Addressed to Corporate Governance and Compliance Division or Human Resources and Organization Development Department

  Address : Global Power Synergy Public Company Limited 555/2 Energy Complex, Building B, 5th Floor, Vibhavadi Rangsit Road, Chatuchak, Chatuchak, Bangkok 10900
- E-mail Address : whistleblowing_complaint@gpscgroup.com
- Website : http://www.gpscgroup.com/th/cg/whistle-blowing
  http://www.gpscgroup.com/en/cg/whistle-blowing
- In person : Submit the report to Corporate Governance and Compliance Division or Human Resources and Organization Development Department.

- Inform the Board of Directors or Management through any available channel such as a letter, e-mail, or in person. The Board of Directors or Management shall then forward the matter to Corporate Governance and Compliance Division and/or Human Resources and Organization Development Department in order to proceed in accordance with "Section 2: Whistleblowing Handling Process."

### 1.3 Whistleblowers:

- Any person who has witnessed or suspects in good faith that there has been an act of fraud or a violation of laws, regulations, rules, orders, notifications, or code of business conduct of the Company, regardless of whether such person has suffered any damage.
- Employees who have been bullied, threatened, unfairly subjected to disciplinary action, or penalized without reasonable grounds such as salary reduction, suspension, termination of employment, or discriminatory treatment related to employment conditions as a result of filing a whistleblowing, providing information, intending to provide information, assisting in the whistleblowing investigation process, collecting facts for the whistleblowing recipient, or participating in legal proceedings. This includes acting as a witness, giving statements, or cooperating with courts or government authorities.

Whistleblowing should be made using polite language. Whistleblowers may choose not to disclose their identity. However, the whistleblowing must provide sufficient factual details or clear evidence indicating the events, circumstances, actions, or supporting evidence related to the whistleblowing so that the responsible unit can conduct further investigation and fact discovery.

Nevertheless, the Company encourages whistleblowers to disclose their identity for the purpose of obtaining additional information, enhancing the credibility of the whistleblowing, and facilitating communication and the provision of further useful information, including notification of the investigation results to the whistleblowers. the Company will strictly keep the whistleblower's information confidential.

**1.4** **Accused** refer to the Company's personnel at levels below the Chief Executive Officer (CEO). For whistleblowing against the CEO, any member of the Board of Directors, the SVP Company Secretary and Corporate Governance, or personnel under the Corporate Governance and Compliance Division, the provisions under the Transitional Provisions shall apply.

**1.5** **Coordinators** refer to the Corporate Governance and Compliance Division with the following authorities and responsibilities:

1.5.1 Coordinate with the Preliminary Whistleblowing Screening Committee to ensure the objectives of this policy are achieved.

1.5.2 Maintain records, document progress and final outcomes, update the status of whistleblowing, and monitor and supervise the handling of whistleblowing to ensure completion within the timeframe specified in this policy.

1.5.3 Act as the secretary to the Preliminary Whistleblowing Screening Committee in an additional responsibility.

**1.6** **Preliminary Whistleblowing Screening Committee** consists of:

1.6.1 A representative from the Company Secretary and Corporate Governance Department

1.6.2 A representative from the Corporate Legal Department

1.6.3 Representatives from any other relevant departments

The Preliminary Whistleblowing Screening Committee shall be responsible for screening whistleblowing in order to determine whether a whistleblowing should be accepted or rejected for further consideration. Such determination shall be based on the cause, facts, and sufficiency of the information provided. The committee shall also conduct a preliminary fact-finding investigation, collect and seek evidence and supporting documentation for the consideration of the whistleblowing, and identify any person who may have committed a disciplinary offense under the Work Regulations, Chapter 5: Standards of Conduct and Disciplinary Offenses. In the case of sufficient grounds exist, the committee shall propose the appointment of an Investigation Committee.

**1.7** **Investigation Committee** consists of:

1.7.1 A representative from the Human Resources and Organization Development Department

1.7.2 A representative from the Company Secretary and Corporate Governance Department

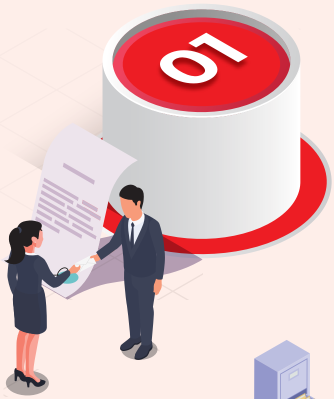
1.7.3 Representatives from any other relevant departments

The qualifications, authorities, and duties of the Investigation Committee shall be in accordance with the "Work Regulations, Chapter 6: Discipline, Investigation, Penalties, and Appeals," Section 2.

The Corporate Governance and Compliance Division shall act as secretary to the Investigation Committee and shall perform the following duties:

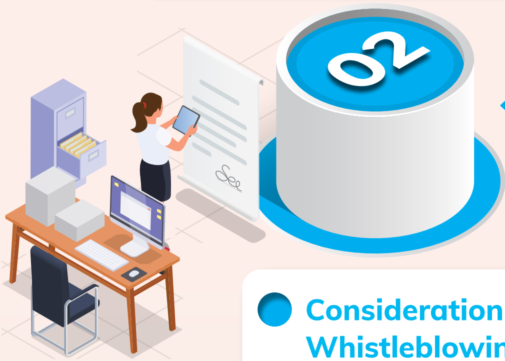
- Prepare investigation reports and coordinate with relevant departments regarding disciplinary actions and legal proceedings.
- Report the investigation results, including the decisions of the Investigation Committee, to the Chief Executive Officer.
- Report to the Corporate Governance and Sustainability Committee and the Audit Committee at least once a year.

## Section 2: Whistleblowing Handling Process




### Whistleblowing Acceptance

Whistleblowers may submit whistleblowing through the channels designated by the Company.

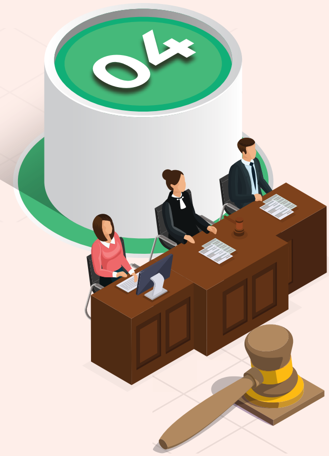



### Consideration for Whistleblowing Registration

Determine whether there is sufficient evidence and reasonable grounds for whistleblowing registration.

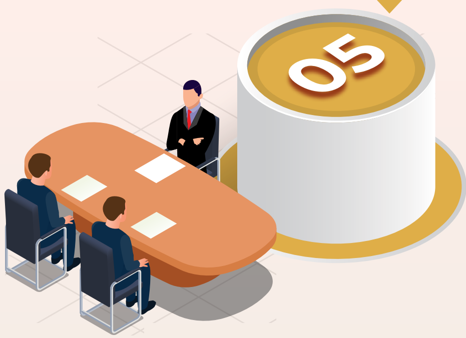

### Investigation

Proceed in accordance with the procedures prescribed in the Company's Work Regulations.




## The Decision

The Investigation Committee shall determine whether the accused is guilty, including the level of disciplinary action or penalties, and prepare an investigation report for submission to the Chief Executive Officer.




## After the Decision

**Not guilty**

Inform the whistleblower of the outcome.

**Guilty**

Proceed in accordance with the Company's Work Regulations.

---

Note: In both cases, the matter shall be reported to the Corporate Governance and Sustainability Committee and the Audit Committee on an annual basis.

Whistleblower/related persons shall keep relevant information regarding the whistleblowing confidential. Whistleblowers shall receive appropriate protection from unfair or unusual treatments such as demotion. However, should there be sufficient evidence that the whistleblower has reported whistleblowing in bad faith, ***disciplinary actions or penalties will be applied.***

## 2.1 Consideration for Whistleblowing Registration

**2.1.1 Whistleblowing may be classified** according to the type of misconduct as follows:

2.1.1.1 Fraud or corruption, as defined in the “Anti-Fraud and Anti-Corruption Policy” and this policy.

2.1.1.2 Misconduct related to the Company's regulations or human resource matters in accordance with the Company's Human Resource Management Regulations.

2.1.1.3 Any act that violates or fails to comply with applicable laws or the Company’s regulations other than the misconduct specified in Clauses 2.1.1.1 and 2.1.1.2. The coordinators shall notify the Preliminary Whistleblowing Screening Committee for consideration of whether the whistleblowing should be registered.

**2.1.2 Acceptance of whistleblowing**

After being accepted, the whistleblowing shall be registered in the Whistleblowing Log, including the following details:

- Registration number
- Reporting channel
- Date of the whistleblowing
- Date of registration
- Type of whistleblowing (as specified in Clause 2.1.1)
- Date the whistleblowing is forwarded to the Human Resources and Organization Development Department in cases falling under whistleblowing types 2.1.1.2 and 2.1.1.3
- Subject of the whistleblowing and a summary of the details

**2.1.3 A whistleblowing shall not be accepted** if it meets any of the following conditions:

2.1.3.1 The whistleblowing does not specify witnesses, evidence, factual details, or clear circumstances of fraudulent or misconduct actions, or there are insufficient grounds to conduct a fact-finding inquiry or investigation.

2.1.3.2 The matter has already been considered or investigated by the Internal Audit Department or another authorized unit of the Company. In addition, it has already been conclusively and fairly resolved without the presentation of new material evidence.

As the secretary of the Preliminary Whistleblowing Screening Committee, the Corporate Governance and Compliance Division shall perform the following duties:

- Obtain the opinions and reasons of the Preliminary Whistleblowing Screening Committee.
- Inform the whistleblower of the decision, provided with the reasons.
- Record whistleblowing that are not accepted in the Whistleblowing Log, provided with the reasons.
- Obtain and inform such information to the Internal Audit Department as a database for audit planning.
- Report to the Corporate Governance and Sustainability Committee and the Audit Committee at least once per year.
- This shall not prejudice the right of the whistleblower to resubmit the whistleblowing if additional evidence becomes available.

## 2.2 Collection of Evidence and Proposal for the Appointment of an Investigation Committee

2.2.1 As the secretary to the Preliminary Whistleblowing Screening Committee, the Corporate Governance and Compliance Division shall obtain the opinions and decisions of the Preliminary Whistleblowing Screening Committee. Where sufficient grounds exist, the matter shall proceed in accordance with Clause 2.2.2. If sufficient grounds do not exist, the status of the whistleblowing shall be recorded in the Whistleblowing Log.

2.2.2 The Secretary of the Preliminary Whistleblowing Screening Committee shall act as the "Accuser" in accordance with the Work Regulations, Chapter 6: "Discipline, Investigation, Penalties, and Appeals," Section 1: "Initiation of Disciplinary Proceedings," Clause 11. In this capacity, the Secretary shall prepare a written submission to the Chief Executive Officer, which shall include the following key elements:

- Background summary
- Preliminary facts
- Accused person
- Relevant disciplinary violations

2.2.3 The Secretary of the Preliminary Whistleblowing Screening Committee shall propose the appointment of an Investigation Committee to the Chief Executive Officer, in accordance with the Work Regulations, Chapter 6: "Discipline, Investigation, Penalties, and Appeals," and Clause 1.6 of this policy.

## 2.3 Investigation

Once the Investigation Committee has been appointed, the Corporate Governance and Compliance Division, as the Secretary to the Investigation Committee, shall convene a meeting to provide explanations regarding the background, facts, and evidence related to the matter. This meeting is intended to enable the committee to plan the investigation process. The procedures and methods of the investigation shall be conducted in accordance with the Work Regulations, Chapter 6: "Discipline, Investigation, Penalties, and Appeals," Section 3: "Investigation Procedures."

## 2.4 Decision

2.4.1 Once the Investigation Committee has completed the collection of evidence, a meeting shall be convened to determine whether the accused has committed a disciplinary offense as alleged. The decision shall be made by majority vote of the committee members present at the meeting. In the event of a tie, the Chairperson of the meeting shall cast an additional deciding vote. If the Chairperson or any committee member holds a dissenting opinion, such dissenting opinion shall be attached to the investigation report.

2.4.2 The results of the investigation shall be reported to the Chief Executive Officer. The report shall include the following key elements:

- A summary of the facts, sequence of events, evidence, and any confession by the accused (if any)
- An analysis comparing evidence supporting the allegations and evidence refuting the allegations (if any)
- The opinion of the Investigation Committee regarding the appropriate level of disciplinary penalty for the accused
- Recommendations for corrective measures to prevent similar incidents from occurring in the future

The investigation report shall be prepared in accordance with Form SorWor.3, attached to the Work Regulations, Chapter 6: "Discipline, Investigation, Penalties, and Appeals," and shall be considered part of the investigation dossier.

2.4.3 In the case of guilty is found, the department under the Human Resources and Organization Development Division shall prepare the documentation for imposing disciplinary action on the employee and submit it to the Chief Executive Officer for consideration.

In the case of the Chief Executive Officer issues additional instructions or disagrees with the decisions of the Investigation Committee, the Corporate Governance and Compliance Division shall coordinate with the Investigation Committee to review the matter or undertake additional actions before resubmitting the matter to the Chief Executive Officer for further consideration.

## 2.5 Processes after the Decision

**2.5.1 In the case of no guilty,** the coordinator shall notify the whistleblower of the outcome of the proceedings.

**2.5.2 In the case of guilty:**

2.5.2.1 Actions shall be taken in accordance with the Work Regulations, Chapter 6: "Discipline, Investigation, Penalties, and Appeals," Section 4: "Penalties."

2.5.2.2 The results of the decision shall be reported to the whistleblower.

2.5.2.3 The department under the Corporate Legal Office shall proceed with compensation for damages or initiate legal proceedings where the matter involves criminal or civil liability.

The Corporate Governance and Compliance Division shall prepare a summary report of whistleblowing handling outcomes and report to the Corporate Governance and Sustainability Committee and the Audit Committee at least once per year.

## Section 3: Protection of Whistleblowers and Relevant Parties

3.1 Whistleblowers will receive appropriate protection from any threats i.e., changes in job responsibilities or work locations, employment suspension, disturbance, employment termination, or other acts that are unusual or unfair.

3.2 Any individual who apprised of whistleblowing or other information related to whistleblowing as stipulated in this policy shall keep the whistleblowing and all related information confidential and shall not disclose it to another party to ensure the safety of the whistleblower, information sources, and relevant parties.

*Unless* the disclosure is required by the procedure of this policy or the law.

*If any* information is intentionally disclosed, the Company will take disciplinary and/or legal actions against the perpetrator, determined on a case-by-case basis.

3.3 If the whistleblower or those cooperating with the fact-finding process believe that they are not safe and may be affected, they may escalate the issue to the Audit Committee to determine appropriate protection measures.

3.4 Those affected will receive remedies through an appropriate and fair method or process.

## Section 4: Penalties for Bad-Faith Whistleblowers

4.1 Should there be sufficient evidence that the whistleblower has reported whistleblowing in bad faith, the Company shall protect the reputation of the accused party as follows:

4.1.1 If the whistleblower is an employee, an investigation will be carried out to determine disciplinary actions in accordance with the Company's regulations on human resources management.

4.1.2 If the whistleblower is an external party, the Company may consider taking legal actions.

4.2 Any individuals, either intentionally or by negligence, do not comply with this policy or harass, threaten, impose undue disciplinary actions on, or discriminate against the whistleblower or individuals involved in the whistleblowing in accordance with this policy will be considered to have committed an offense and will be required to compensate the company or affected individuals as well as assume civil and criminal liabilities or bear any relevant legal consequences.

## Transitional Provisions Ad hoc investigation and Adjudication

### 1. Roles and Responsibilities of Relevant Parties

**"Ad hoc Investigation Committee"** is an established committee responsible for investigating the accused as specified under this transitional provisions.

**"Ad hoc Adjudication Committee"** is an established committee responsible for judging the accused as specified under this transitional provisions.

### 2. Scope of Whistleblowing

1) For cases when the accused are the Chief Executive Officer, a member of the Board of Directors, a SVP Company Secretary and Corporate Governance, or personnel under the Corporate Governance and Compliance Division.
2) For cases with significant impact and require urgent consideration.

### 3. Procedures

1) The coordinators submit the whistleblowing to the Audit Committee via the Audit Committee's secretary in order to establish an ad hoc Investigation Committee and an ad hoc Adjudication Committee. Section 2 of this policy will be applied.
   *Unless* members of the Audit Committee are the accused. In this case, the Chairman shall appoint an ad hoc Investigation Committee and an ad hoc Adjudication Committee.
2) Any actions not specified under Transitional Provisions shall apply procedure of Section 1-4 of this policy.
   For urgent or significant cases that may affect the Company or PTT's reputation, the coordinators shall notify the working teams as specified in Emergency and Crisis Communication Plan Handbook to communicate the issue to PTT's responsible person. This is to comply with PTT Group Way of Conduct.