



Anti-Fraud and Corruption Policy

of

PTT Public Company Limited

PTT Public Company Limited (PTT) has commitment to honesty, fairness, and transparency in business practice following the principles of good corporate governance. PTT places great importance on compliance with relevant laws and regulations in all business activities in the country and abroad. Also, we are intolerant of direct or indirect fraud and corruption in any form. On these grounds, PTT established an Anti-Fraud and Corruption Policy. All directors, executives, employees and any persons acting for benefit of PTT, or on behalf of PTT must strictly comply with the policy.

Definition

“**Fraud**” means committing an act in order to procure, for himself/herself or another person, any advantage to which he/she is not entitled by law, which includes the following actions:

1. “**Asset Misappropriation**” means possessing property belonging to another person, or of which the other person is a co-owner, and dishonestly converting such property for himself/herself or a third person;
2. “**Embezzlement**” means the act of deceiving a person with the assertion of a falsehood or the concealment of facts which should be revealed, dishonestly, and, by such deception, obtaining property from the person who has been deceived or a third person, or causing the person who has been deceived or a third person to execute, revoke, or destroy any document of right;
3. “**Financial Statement Fraud**” means the alteration of financial records by taking advantage of loopholes in accounting principles and various options for valuation. This includes the disclosure of accounting information to change information in financial statements for a wrongful purpose; and
4. “**Corruption**” means wrongfully demanding, accepting, agreeing to accept or ask, offering, pledging, or promising to give assets or any other benefit to a government official, a government agency, an officer of a private organization, or a private organization, so as to induce the said person or agency to use the authority that they have in committing, not committing, hastening, or delaying carrying out, any act which is an abuse of power, in order to obtain, for himself/herself or another person, benefits to which he/she is not entitled by law, or in order to maintain his/her business, or any benefits which are not appropriate in terms of his/her business, unless it is a case where laws, traditions, or local customs stipulate otherwise.

"PTT personnel" means PTT's directors, executives and employees at any level.

" PTT related person" means contract employees, representatives, consultants, subsidiary companies or any person acting for or on behalf of PTT, regardless of whether having the power or authority to take such action.

Scope of Implementation

This policy applies to PTT personnel and PTT related person.

Practices

1. PTT personnel shall strictly comply with PTT's Anti-Fraud and Corruption Policy including fraud and corruption prevention processes.
2. PTT personnel shall perform their duties to the best of their ability and with integrity, fairness, morality, ethics, professional codes of ethics and responsibility.
3. PTT personnel shall not commit or involve in any form of fraud and corruption, whether directly or indirectly. PTT personnel shall comply with the Anti- Fraud and Corruption Policy, Corporate Governance, Ethical Standards and Code of Business Ethics Handbook, including regulations and relevant articles.
4. PTT personnel shall avoid any behaviour that could potentially signal a conflict of interest with PTT. Any action must be reasonable for the benefit of PTT, and not violating any applicable laws and regulations. If any action or circumstance involves conflicts of interest with PTT, such persons shall report the conflicts of interest through channels designated by PTT.
5. PTT personnel shall perform their duties with care in receiving and offering gift, assets or other benefit including hospitality and other expenses. The practice must be in line with Guidelines for Receiving and Offering Gifts, Hospitality, or Other Benefits and comply with relevant regulation and rules.
6. PTT personnel are prohibited from bribery, including offering or accepting other similar benefits, of any government official or private official, whether directly or indirectly, in order to induce, to influence, or to obtain benefits which is not entitled by law.
7. When PTT engages an external person to carry out business on its behalf, the related person must communicate PTT's Code of Business Ethics to such external person and ensure that the engagement terms and conditions are transparent, appropriate and lawful without fraud and corruption.

8. Donation and contribution by PTT shall have review, approval and audit processes. Document evidences must be precise and comply with PTT regulations. Such process can ensure that donation and contribution shall not be used as a pretext for fraud and corruptions.
9. PTT shall establish an integrated Governance, Risk, and Compliance (GRC) to promote Anti-Fraud and Corruption oversight, such as risk assessment for fraud and corruption in all business processes, e.g. sales, marketing, investment, procurement, and contract management. PTT shall develop proper mitigation plan, as well as regularly assess the efficiency and effectiveness of such mitigation.
10. PTT shall have human resource management system that reflects anti-fraud and corruption commitment.
11. PTT shall provide communication and training that genuinely educate PTT personnel on the Anti-Fraud and Corruption measures, PTT expectations and punishment for violation.
12. No PTT Personnel will suffer demotion, penalty or other adverse consequences for refusing to pay bribes or involve in fraud and corruption, even if such refusal may result in PTT losing business. PTT shall have clear communication for this principle.
13. The internal control unit shall report control self-assessment result to internal audit for inspection. If any non-compliance to the Anti-Fraud and Corruption Policy is found, a notice to improve controlling measures shall be issued to the non-compliance or related unit.
14. PTT shall establish procedures to ensure that the internal controls of accounting and record keeping process are reviewed to verify the accuracy and appropriateness of the financial report. Also, the process aims to confirm that the evidence for the financial report is sufficient for auditing, as well as ensuring the effectiveness of the anti-fraud and corruption measures.
15. PTT shall communicate the Anti-Fraud and Corruption Policy and practice to PTT related person, subsidiaries, affiliates and other controlled companies, business partners and stakeholders including general public through various communication channels. The objective of this communication is to create awareness and ensure that the Anti-Fraud and Corruption Policy is implemented.
16. PTT shall establish procedures on screening and monitoring of business partners, vendors, suppliers, and customers (Third Party Screening). PTT shall monitor vendors or business partners to ensure that they comply with anti-fraud and corruption measures.
17. Office of Corporate Audit can report -as an urgent matter- violation or suspicious behaviour relating to fraud and corruption to the President and Chief Executive Officer and the Audit Committee. Then the matter will be reported to the Board of Directors.

Whistleblowing Policy and Whistleblower Protection

PTT personnel shall not neglect or ignore any action that may violate the Anti-Fraud and Corruption Policy. When personnel need to notify information or clues, or require consultation on anti-fraud and corruption measures, whistleblowing channels provided by PTT are available. PTT shall provide protection to the whistleblower. This is in accordance with PTT Public Company Limited Articles on Whistleblowing Policy.

Penalty

PTT shall establish appropriate punishment system on non-compliance and direct or indirect violating personnel against the Anti-Fraud and Corruption Policy. Disciplinary punishment including redundancy if deems necessary and legal procedure shall be considered. In the case that PTT related person fails to comply with this policy, PTT may consider terminating the relationship. PTT personnel and PTT related person shall understand and comply with the Anti-Fraud and Corruption Policy in every operating procedure. Either genuine or false fraud and corruption accusation may defame PTT personnel and PTT reputation. Any concerns in relation to the violation of this policy can be raised via the channels as stipulated by PTT.

Announced on 9th July B.E. 2564 (2021)

(Professor Dr. Thosaporn Sirisumphand)

Chairman of the Board of Directors

PTT Public Company Limited