

(Translation)

Anti-Corruption Policy

B.Grimm Power Public Company Limited and its Subsidiaries

B.Grimm Power Public Company Limited and its subsidiaries (“**B.Grimm Power**”) are intent on conducting its business with honesty, integrity, transparency and fairness, in compliance with the principles of good Corporate Governance and against all forms of fraud and corruptions. The Anti-Corruption Policy is therefore established for all Personnel of B.Grimm Power to adhere for practicing and using as a guideline for their work performance.

1. Definitions

“**Fraud**” refers to any act or behaviour with the intention in bad faith to derive money, benefits or avoid any obligations or any unlawful act causing damage to B.Grimm Power.

“**Corruption**” refers to the bribery regardless of whether in any forms as follows:

(1) Grant and offer/promise/promise to give;

(2) Acceptance and demand of:

Monies, properties or any other benefits which are not appropriate for the government officials or private sectors or individual who are involved regardless of whether directly or indirectly, in order for such persons act or omit a duty to obtain or retain business or other benefits that are improper in a business context. Exceptions shall be applicable for the case that the laws, regulations, announcements, rules, local traditional practices or commercial customs is permitted.

“**Facilitation Payment**” refers to a small amount of expenses paid to the state officials informally to ensure that they shall proceed an action or to accelerate the procedures under legitimate authorisation, and such procedures are generally considered as legal right belonging to any juristic persons such as an application for license or certificate or the use of public services.¹

“**Personnel of B.Grimm Power**” refers to directors, executives and employees at all levels of B.Grimm Power Public Company Limited and its subsidiaries.

2. Policy

B.Grimm Power is committed to operating business in compliance with the laws, with integrity, transparency and in line with the code of ethics, with the clear intention of anti-Fraud and Corruption of any form, and has no policy to impose any penalty or negative action on the Personnel of B.Grimm Power who refuse Fraud and Corruption, which may cause B.Grimm Power to lose any benefit or business opportunity. To this effect, it is a duty of the Personnel of B.Grimm Power to strictly comply with such policies, and refrain from participating or involving themselves in any form of Fraud and Corruption, both directly and indirectly, so as to ensure that B.Grimm Power complies with the best practice for business operations and efficiently prevents any risks from Fraud and Corruption.

¹ Reference to Guidelines on Appropriate Internal Control Manual (page 35) by Office of the National Anti-Corruption Commission and Guideline on “Facilitation Payment” and “Revolving Door” by Private Sector Collective Action Coalition Against Corruption (CAC)

- 2.1 Personnel of B. Grimm Power shall not be involved in Fraud and Corruption in any of its form, whether directly and indirectly.
- 2.2 Personnel of B. Grimm Power is prohibited to offer, request, accept or give any kind of benefits which are Fraud and Corruption and also prohibited to make any Facilitation Payment that may lead to Fraud and Corruption.
- 2.3 Personnel of B. Grimm Power shall refrain from accepting or giving any gifts, souvenirs, assets, or any benefits or offering or accepting any hospitality or entertainment or accepting or offering any invitations to events, or seminars, both in the country and abroad, as a result of good business relationship which may risk to Fraud and Corruption.

If it is unavoidably necessary, the discretion must be properly exercised, taking into account customary practices, applicable laws, rules and notifications and must be carefully conducted in accordance with the Gift-giving and Hospitality Policy as determined by B.Grimm Power.
- 2.4 Any forms of donation or sponsorship for charity, without business benefits or considerations, is considered as social contribution enhancing good image for the organisation. Therefore, such donation or sponsorship must be transparency and strictly conducted in compliance with Donation and Sponsorship Policy of B.Grimm Power in order to ensure that the donation and sponsorship will not lead to Fraud and Corruption.
- 2.5 B.Grimm Power operates our business with a policy on political impartiality in every country where we operate, and has no practice or policy to provide any political support or assistance, whether financial or by means of any other property, to political parties, groups, politicians and those involved in politics, whether directly or indirectly, as well as refrain from engaging or participating in any activities which will jeopardise our political impartiality and/or cause damage due to participation in such activities.
- 2.6 Any activities with government authorities or state officials shall be conducted accurately, transparently, and strictly in compliance with relevant laws, rules, regulations, and requirements.
- 2.7 To regularly provide the internal control systems and risk assessment with efficiency and appropriate in order to prevent the Corruption. To review and assess business's operational risks that may lead to the Corruption risks of at least once (1) a year;
- 2.8 To provide mechanisms for transparent and accurate financial reporting in accordance with the accounting standards that have been accepted internationally;
- 2.9 To establish the recruitment process of the human resources which reflects the Company's commitment to against Fraud and Corruptions;
- 2.10 To provide the communication channels with the protective measurement for the whistleblower for Personnel to be able to submit the clues, suggestions and complaints regarding the Corruptions;
- 2.11 To perform all tasks to be in accordance with the laws regarding Corruption in all countries where B.Grimm Power and its subsidiaries operate;

- 2.12 Any act of the violation or fails to comply with this policy whether directly or indirectly, shall be subject to the disciplinary consideration according to the regulations stipulated by B.Grimm Power, including punishment as stipulated by relevant laws.

Personnel of B. Grimm Power must understand and strictly comply with the Anti-Corruption Policy in all actions during the work performance. Should any action contrary to the applicable policies, the supervisor or the responsible department/division/individual must be notified and shall prepare the written record of such incident.

The Anti-Corruption Policy was approved by the Board of Director's Meeting No. 13/2021 dated 14 December 2021 with effective from 15 December 2021.

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(Mr. Harald Link)

Chairman