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## **Anti-Corruption Policy**

Eastern Water Resources Management and Development Group Public Company Limited is committed to conducting business with integrity, social responsibility, and accountability to all stakeholders in accordance with good corporate governance principles and the business ethics of the group. This supports sustainable growth for the company.

The company has joined the "Thai Private Sector Collective Action Against Corruption (CAC)" to demonstrate its intention and commitment to combating all forms of corruption, both direct and indirect. Therefore, the company has established an anti-corruption policy.

### **Definitions according to the Anti-Corruption Policy.**

**Misconduct** refers to any act or omission in a position or duty, or any act or omission that may lead others to believe that one has a position or duty, even if one does not have that position or duty. It also includes using one's position or duty to seek undue benefits for oneself or others or committing acts that violate the position or duty under the Criminal Code or other laws. This includes bribery, extortion, fraud, abuse of power, unfair use of power, embezzlement, money laundering, and other similar acts.

**Corruption** refers to any act with government officials, foreign government officials, officials of international organizations, state agencies, private sector agencies, or any other person doing business with the group, directly or indirectly, to make such persons perform or omit their duties to obtain agreements and/or business contracts or other inappropriate benefits. This includes offering, giving, promising, requesting, demanding, bribing, as well as giving or receiving money, gifts, assets, or other inappropriate benefits, except in cases permitted by law, regulations, local customs, or business traditions.

**Bribery** refers to offering, promising, or giving, as well as requesting or receiving benefits related to assets or other benefits, directly or indirectly, to induce actions, omissions, or delays in actions that are inappropriate to obtain business or to maintain or introduce the business to a specific group of companies or to maintain other inappropriate benefits according to business ethics.

**Political Contribution** refers to giving assets, money, items, rights, or other benefits to assist, support, or benefit political parties, politicians, person involved in political affairs, political alliances, person in political power, or political candidates, directly or indirectly.

**The Company** refers to Eastern Water Resources Development and Management Public Company Limited.

**The Group** refers to Eastern Water Resources Development and Management Public Company Limited and its subsidiaries as defined in the Securities and Exchange Act.

**Gifts or Assets or Other Benefits** refers to items of value other than money given at various times for goodwill or as rewards, or given out of affection or for assistance, or given as a token of appreciation. This includes special privileges not available to the public, such as discounts on assets or special privileges for services, training, or entertainment, as well as pre-paid or reimbursed travel expenses, accommodation, meals, or other similar items, whether given as tickets, vouchers, or other evidence. This also includes pre-paid or reimbursed payments to show goodwill or given on various occasions according to customs, traditions, or culture, or given according to social etiquette, such as New Year's gifts, birthday gifts, gifts for new positions, retirement gifts, etc.

**Facilitation Payments** refer to unofficial payments made to government officials to ensure that the officials carry out processes or expedite processes without requiring the discretion of the officials, and the actions are within the officials' duties and are legally entitled to be performed, such as obtaining permits, certificates, and public services.

**Entertainment and Hospitality** refers to expenses for business entertainment, such as meals and drinks, sports entertainment, and other expenses directly related to business conduct or business traditions, including providing business knowledge and understanding.

**Donations and Sponsorships** refer to supporting money, products, or services to those requesting support or donations for public benefit or to promote business and the good image of the group.

**Government Officials** refer to government officials, political office holders, judges of the Constitutional Court, office holders in independent organizations, and members of the National Anti-Corruption Commission.

**State Officials** refer to civil servants or local government employees with permanent positions or salaries, those working in state agencies or state enterprises, local administrators, deputy local administrators, assistant local administrators, and members of local councils of local administrative organizations. This includes officials under the law governing local administration or other officials as defined by law, including directors, sub-committees, employees of government agencies, state agencies, or state enterprises, and individuals or groups of individuals authorized by law to exercise administrative power established in the bureaucracy, state enterprises, or other state activities, but does not include political office holders, judges of the Constitutional Court, office holders in independent organizations, and members of the National Anti-Corruption Commission.

**Foreign Government Officials** refer to individuals holding legislative, executive, administrative, or judicial positions in foreign countries, and any person performing duties for foreign

countries, including performing duties for state agencies or state enterprises, whether appointed or elected, holding permanent or temporary positions, and receiving salaries or other compensation or not.

**Officials of International Organizations** refer to individuals performing duties in international organizations or individuals assigned by international organizations to perform duties on behalf of those organizations.

**Political Office Holders** refers to:

- (1) Prime Minister
- (2) Ministers
- (3) Members of the House of Representatives
- (4) Senators
- (5) Other political civil servants besides (1) and (2) under the law governing political civil servants.
- (6) Parliamentary political civil servants under the law governing parliamentary civil servants.

**Family** refers to parents, siblings, spouses, children or adopted children, both of attain legal age and minors, spouses of children or adopted children of directors, advisors to the board, chief executive officers, executives, and employees of the group.

**Spouse** refers to individuals living together as husband and wife, whether registered or not, of directors, advisors to the board, chief executive officers, executives, and employees of the group, and having one of the following characteristics:

(1) Have performed a marriage ceremony or other similar ceremony with directors, advisors to the board, chief executive officers, executives, and employees of the group, with family members or outsiders acknowledging that they are living together as husband and wife according to customs.

(2) Directors, advisors to the board, chief executive officers, executives, and employees of the group show that they have the status of husband and wife or have circumstances generally recognized by society as having such status.

This includes individuals who have registered marriage with directors, advisors to the board, chief executive officers, executives, or employees of the group and later registered for divorce according to law but still show or have circumstances generally recognized by society as having the status of husband or wife.

## **Anti-Corruption Policy.**

Directors, advisors to the board, chief executive officers, executives, and employees of the group must comply with laws, regulations, practices, and anti-corruption policies, as well as good corporate governance principles and business ethics of the group with transparency. They must not request, conduct, or accept any form of corruption, directly or indirectly, for their own benefit, family, friends, and acquaintances. This covers the group's business and all related units. The group has established practices and roles for responsible person, as well as regular reviews and assessments of compliance with this anti-corruption policy to align with business changes, regulations, and relevant laws.

## **Roles and Responsibilities.**

1. The group's board of directors is responsible for setting policies, overseeing, and monitoring operations to ensure that the group achieves its objectives according to the anti-corruption policy.

2. The Governance and Sustainability Development Committee is responsible for reviewing the anti-corruption policy to align with business changes, regulations, and relevant laws, and approving amendments for submission to the company's board of directors. They also provide useful opinions and recommendations for planning and implementing measures.

3. The Audit Committee is responsible for reviewing and overseeing the internal control system, risk management process, financial reporting, monitoring, and evaluating anti-corruption measures, as well as receiving complaints to ensure that the operations of various units are efficient, legal, and comply with good ethical standards.

4. The management is responsible for implementing the anti-corruption policy, communicating and promoting understanding among all levels of employees and all related parties to perform their duties without corruption. They also support the group in considering the implementation of anti-corruption policies and measures as appropriate and implementing the opinions and recommendations of the group's board of directors and/or sub-committees. This includes reviewing the appropriateness of systems and measures, reporting issues found to the group's board of directors and/or sub-committees according to roles and responsibilities.

## **Practices.**

1. Directors, advisors to the board, chief executive officers, executives, and employees of the group are prohibited from hiring any business agents or intermediaries with the intention of committing corruption.

2. The group does not have a policy to pay facilitation fees in any form to government officials, directly or indirectly. They will not conduct or accept any actions in exchange for facilitation in business operations.

3. The group has established appropriate and clear criteria for hiring government officials to prevent such actions from being used as compensation for obtaining any benefits. They also have measures to disclose information about hiring government officials to the public for transparency.

4. Any actions according to the anti-corruption policy must follow the practices set by **the company in good corporate governance principles and business ethics of the group, as well as regulations and operational manuals related to the group**, summarizing the relevant key points as follows:

- 1) Be cautious in high-risk processes for corruption.
- 2) Be cautious in transactions with individuals, legal entities, or organizations.
- 3) Do not neglect or ignore when witnessing actions that fall under corruption. Report to supervisors or responsible person.
- 4) Have measures to protect employees or whistleblowers and complaints.
- 5) Conduct risk assessments for corruption and have preventive measures for operational control, environmental control, and financial control.
- 6) Treat partners fairly and transparently in procurement of goods and services. Strictly evaluate and select partners according to procurement regulations.
- 7) Have policies for giving or receiving gifts, assets, or other benefits, including hospitality and reception policies.
- 8) Have policies to control donations and support for charity.
- 9) Have a neutral political policy and will not provide political assistance.
- 10) Organize the organizational structure appropriately for managing and controlling the group's structure in line with business goals and characteristics.
- 11) Provide continuous training on anti-corruption measures and knowledge to directors, advisors to the board, chief executive officers, executives, and employees at all levels.
- 12) Establish clear, concise, effective, transparent, and verifiable internal operational authority regulations, procurement regulations, and other regulations.
- 13) Communicate the anti-corruption policy to the group's employees, customers, partners, stakeholders, and the public through various communication channels to understand and implement the anti-corruption policy.

**Penalties.**

- 1) Corruption is considered a violation of the group's business ethics, and the group has measures to punish by removal from position and legal action for directors and advisors to the board, and dismissal without compensation and legal action for chief executive officers, executives, and employees of the group.
- 2) The group will cancel procurement if partners are found to commit corruption or bribery.

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President & CEO	Chairman of the Board of Director
25 October 2023	