

MANUAL ON THE CODE OF CONDUCT AND ANTI-CORRUPTION

To guide all levels of executives and employees of **Absolute Clean Energy Public Company Limited ("the Company")** and its subsidiaries (collectively, "**the Group**") in their operations, the Group has provided a manual on the Code of Conduct and Anti-Corruption.

This manual also includes guidelines for reporting whistleblowing and complaint, as well as procedures for handling incidents involving **illegal acts, corruption, human rights violations, breaches of policies or regulations**, or actions inconsistent with the Group's principles of good corporate governance and ethics.



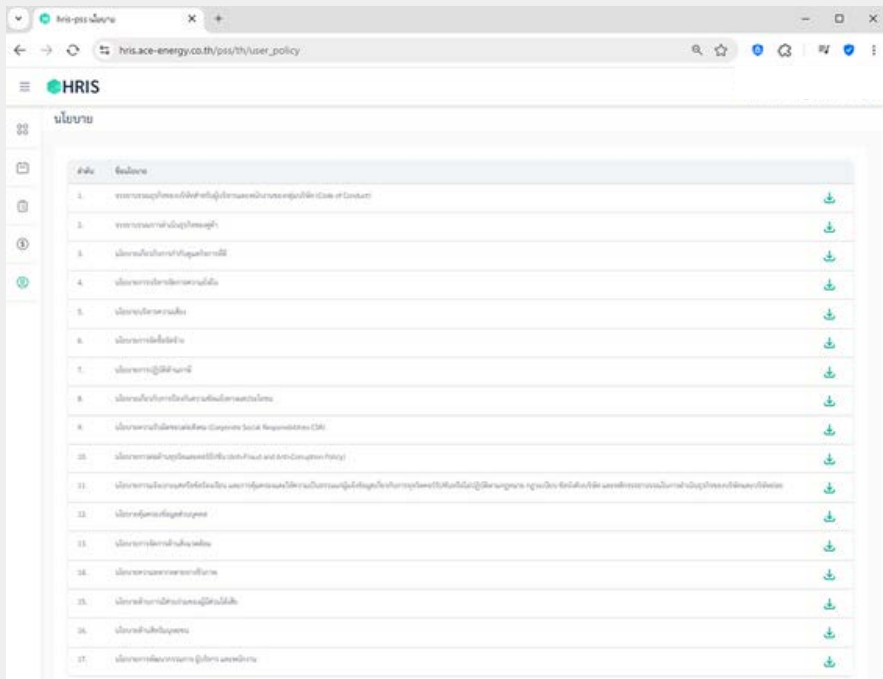
Channels for Accessing the Code of Conduct and Policies

For External Personnel



Company Website
www.ace-energy.co.th

For Internal Personnel



My Pass: The internal system for accessing all policies.

Code of Conduct

Scope of Application

The Company has established this Code of Conduct as a standard and it is applicable to executives and employees at all levels of Absolute Clean Energy Public Company Limited ("**the Company**") and its subsidiaries. The executives and employees are to adhere to their duties as assigned, and they are encouraged to be good role models in performing their duties. Under the Code of Conduct, the executives and employees of the Company and its subsidiaries must be aware, understand, and strictly adhere to their duties. Each person's performance must be efficient, open, and transparent and takes into account the best interests of the Company and its subsidiaries and is fair to all relevant stakeholder groups.

"**Executive**" means the Chief Executive Officer and executives in positions below the Chief Executive Officer to Department Director.

"**Employee**" means employees in a position lower than Department Director, both permanent employees, temporary employees, special contract employees, and contract employees.

1. Conflict of Interest Policy

The Company has established a policy requiring all personnel within the Group to strictly adhere to the Business Code of Conduct and related guidelines, recognizing this as a crucial principle for maintaining the trust and confidence of all stakeholders. Additionally, the Company ensures that information and understanding of these practices are disseminated across the Group.

Group personnel must disclose to the Company any relationships or connected transactions that may lead to a conflict of interest.

In cases where transactions may constitute a conflict of interest, intercompany transactions, or related-party transactions, they must comply with good corporate governance principles and adhere to the regulations set forth by the Stock Exchange of Thailand (SET) and the Securities and Exchange Commission (SEC).

Practices

1.1 Executives

After the Company has converted to a public limited company and has been listed in the SET, it must comply with the regulations of the Stock Exchange of Thailand, whereby the management must consider conflicts of interest in relation to connected transactions between the Company and its subsidiaries with prudence, honesty, rationale, and independence within a framework of good ethics. Taking into account the interests of the Company is the key to ensure that such transactions are reasonable and mainly for the benefit of the Company.

1.2 Executives and employees

1.2.1 Executives or employees must not do anything that conflicts with the Company's interests, whether directly or indirectly, by himself or jointly with others, whether due to contact with those involved

Resource : • Code of conduct • Anti-Fraud and Anti-Corruption Policy
• Whistleblower Policy

Part 1 Code of Conduct

- Individuals obligated to follow the Code of Conduct
- Actions considered to be violations of the Code of Conduct
- Policies and Guidelines Referenced in the Code of Conduct
- Monitoring and Supervision of Code of Conduct Compliance

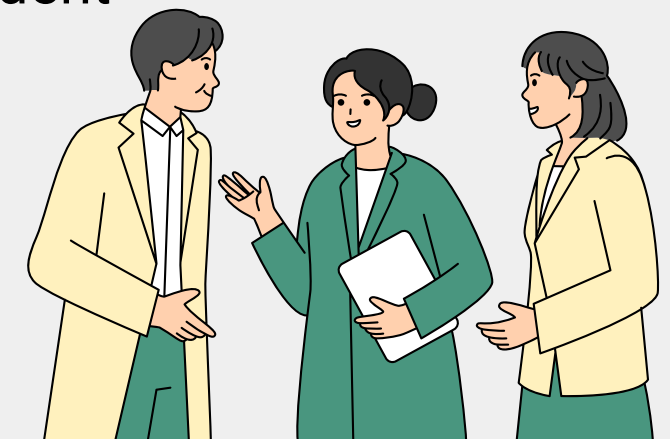


This can be accessed at

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Individuals obligated to follow the Code of Conduct

- Executives and Employees of the Company
- Subsidiaries under the company's supervision or control, including existing business and those to be established in the future, must accept and comply with the company's Code of the Conduct.
- Subsidiaries that are not under the Company's supervision should accept and comply with the Company's Code of the Conduct
- External parties who are representatives of the Company, such as consultants, agents, and independent contract parties must:
 - Give consent to comply with the Company's Code of Conduct.
 - Acknowledge the Code of Conduct.
 - Be subject to appropriate actions, which may include terminating the contract, if the Company determines that any external party violates the Company's Code of Conduct.



Actions considered to be violations of the Code of Conduct

All employees are responsible for complying with and promoting adherence to the Company's Code of Conduct. The following actions are considered violations the Code and will lead to disciplinary proceedings.

- Failing to comply with the Code of Conduct.
- Advising, supporting, or encouraging others not to comply with the Code of Conduct.
- Ignoring and being indifferent when seeing the violation or non-compliance to the Code of Conduct, in the case that the person knows, or should have known because it is related to the work under one's responsibility.
- Refusing to cooperate with or obstructing an investigation into alleged violations or non-compliance with the Code of Conduct.
- Blaming, rebuking, or threatening employees who report suspected non-compliance with the Code of Conduct.
- Treating others unfairly due to their reporting of non-compliance with the Code of Conduct.



Policies and Guidelines Referenced in the Code of Conduct

- Conflict of Interest
- Preservation and Use of Assets and Information / Company Confidentiality
- Offering or Receiving Gifts, Entertainment, and Hospitality
- Securities Trading and Inside Information
- Internal Control, Internal Audit, accounting and Financial reporting
- Responsibility to Shareholders
- Treatment of Executives or Employees
- Behavior of Executives or Employees
- Safety, Occupational Health, and Working Environment
- Anti-Unfair Competition
- Information Security and Information System
- Anti-Fraud and Anti-Corruption

For more information, please refer to

**[HTTPS://WWW.ACE-
ENERGY.CO.TH/STORAGE/CONTENT/SUSTAINABILITY/CG/
DOWNLOAD/20230411-EGGD-COC-TH.PDFT](https://www.ace-energy.co.th/storage/content/sustainability/cg/download/20230411-EGGD-COC-TH.PDFT)**

Monitoring and Supervision of Code of Conduct Compliance

- All directors, executives, and employees are obligated to acknowledge, understand, and strictly adhere to the policies and practices of the Code of Conduct. Claims of ignorance will not be accepted.
- Management at all levels must take responsibility for ensuring that their subordinates understand, and comply with the Code of Conduct in order to achieve business goals and uphold business ethics for the benefit of shareholders, stakeholders, the Company, and society.
- Multiple channels shall be provided for seeking consultation on concerns, and for reporting whistleblowing and complaints regarding violations of the Code of Conduct, such as the company's website, direct supervisors, and designated reporting lines.
- Communication and dissemination of the Code of Conduct and related policies shall be conducted to foster comprehensive understanding.
- Internal control systems that cover both management and operational levels shall be established to support effective corporate governance, and outsourced internal auditors shall be engaged to audit and assess the adequacy of these internal control systems.
- The Company does not tolerate any actions that are illegal or contrary to good ethical principles. Individuals who violate the Code of Conduct shall be subject to appropriate disciplinary penalties. If such violations involve the laws, rules, or regulations of the country, the Company shall promptly report them to the relevant authorities for further action.
- To prevent recurrence of business ethics violations, the head of the involved department or the designated department shall review the incident, determine corrective and preventive measures, and ensure continuous monitoring of the issue.
- A registry of complaints and whistleblowing reports shall be established, covering both resolved cases and those under investigation.
- The Code of Conduct shall be reviewed every two years to ensure its appropriateness in response to changing business circumstances and the environment.
- Compliance with the Code of Conduct shall be monitored annually, and the results reported on a yearly basis (January–December) to the Company's Board of Directors.

Part 2 Anti-Fraud and Anti-Corruption

- Scope of Application
- Responsibilities
- Definition “Fraud and Corruption”
- Types of Corruption
- Potential Impacts on the Company Resulting from Fraud and Corruption
- Approaches to Refusing the Offering or Acceptance of Bribes
- Guidelines for Compliance with Anti-Fraud and Anti-Corruption Policy
- Policies and Practices
 - Offering or Receiving Gifts, Hospitality, or Entertainment
 - Policies and Practices
 - Political Contribution
 - Conflict of Interest Prevention
 - Facilitation Payments
 - Employment of Government Officials (Revolving Door)



ACE ได้รับการรับรอง
เป็นสมาชิกแนวร่วมต่อต้านคอร์รัปชัน
ของภาคเอกชนไทย เป็นครั้งแรก



Reflecting the commitment of our Board of Directors, executives, and all employees to good corporate governance and anti-corruption, **we have declared our intention to join the Thai Private Sector Collective Action Against Corruption (CAC) and have been officially certified as a member.**



SCOPE OF APPLICATION

This policy applies to **the company's directors, executives, employees, subsidiaries, and joint ventures, as well as any individuals acting for the benefit of the company, including business agents, contractors, consultants, and partners.** All parties must strictly adhere to this policy without exception.

This policy can be accessed at

<https://www.ace-energy.co.th/storage/content/sustainability/csr/20240528-ace-anti-corruption-policy-th.pdf>

RESPONSIBILITIES

1. Board of Directors

- Establish, review, and approve the company's anti-fraud and anti-corruption policies and practices.
- Oversee anti-fraud and anti-corruption measures across the company.
- Ensure the adequate and effective measures and systems are implemented to prevent fraud and corruption at organization level.
- Lead by demonstrating commitment and serving as a role model in anti-fraud and anti-corruption efforts.
- Approve processes related to anti-fraud and anti-corruption measures, including the reporting and handling of corruption incidents.

2. Audit and/or Corporate Governance Committee

- Review and provide opinions on the anti-fraud and anti-corruption policy.
- Oversee internal controls and review related control processes to ensure their adequacy and effectiveness.
- Audit and investigate any potential fraud or corruption-related concerns.



RESPONSIBILITIES



3. Senior Management

- Lead by demonstrating commitment and serving as a role model in anti-fraud and anti-corruption efforts.
- Ensure the adequate and effective systems are in place for preventing fraud and corruption within the organization.
- Communicate and support the policy throughout the organization to foster a culture of integrity.

4. Internal Audit Department

- Audit and review operations to ensure compliance with policies, guidelines, and regulations, and to confirm their adequacy and effectiveness in preventing potential fraud and corruption.
- Assess internal controls concerning the risks of fraud and corruption.
- Provide advice on internal audit and risk assessment practices.
- Report any issues found to the Audit Committee and the Corporate Governance Committee.

RESPONSIBILITIES



5. Human Resources Department

- Arrange training and dissemination of the anti-fraud and anti-corruption policies and guidelines for employees and business stakeholders to foster understanding and promote transparent operations.
- Provide channels for reporting suspicions, whistleblowing, and complaints related to fraud and corruption and ensure widespread communication of whistleblower protection measures.
- Promote a culture of integrity within the organization.
- Verify the backgrounds of job applicants as part of the recruitment process, in accordance with the anti-fraud and anti-corruption policy.

6. Employees

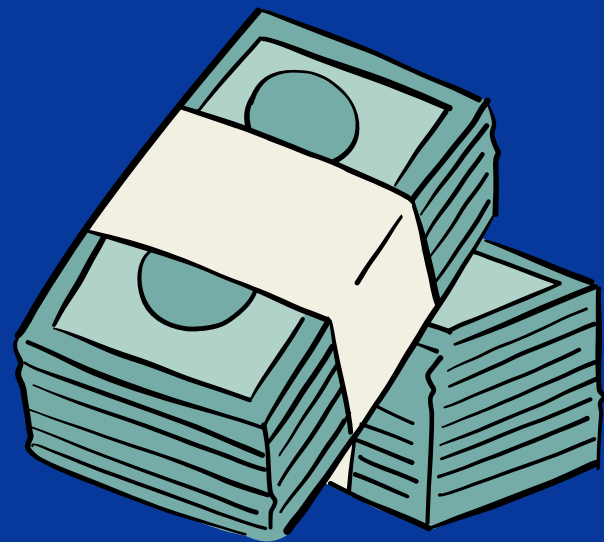
- Strictly Comply with the anti-fraud and anti-corruption policy and related measures.
- Participate in anti-fraud and anti-corruption training and activities as designated by the Group.
- Avoid any activities that may lead to violations of the policy and report any corruption-related risks to supervisors so appropriate mitigating measures can be implemented.
- Report any suspected fraud or corruption incidents using the company's designated channels.
- Communicate anti-fraud and anti-corruption policies and guidelines to stakeholders.
- Cooperate with investigations into suspected fraud and corruption.

7. Business Partners (e.g., Contractors, Suppliers)

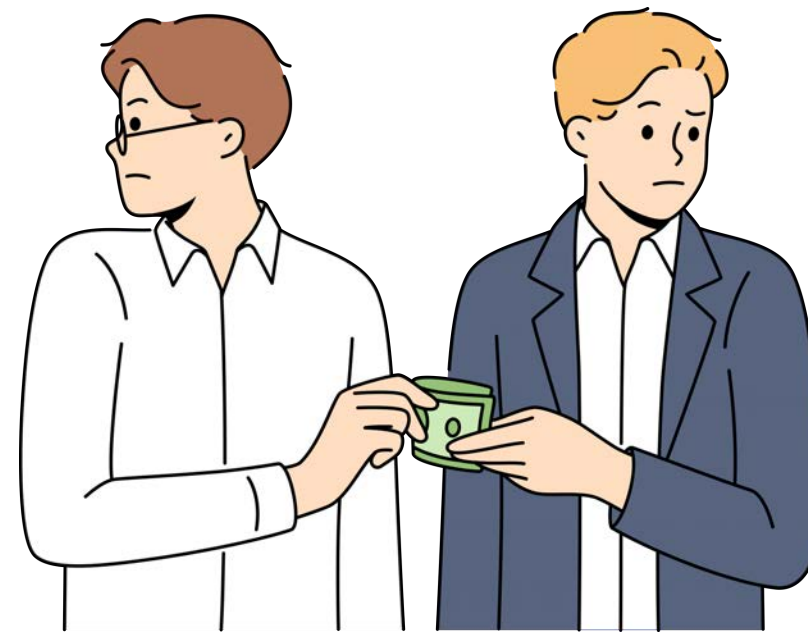
- Understand the company's anti-fraud and anti-corruption policy and policies.
- Adhere to the policy and cooperate with the company's anti-fraud and anti-corruption efforts.

What are Fraud and Corruption

Any act to gain an improper advantage for oneself or others (e.g., family members, friends, acquaintances) by unlawful means. This includes embezzlement, falsifying accounts, and corruption.



Embezzlement

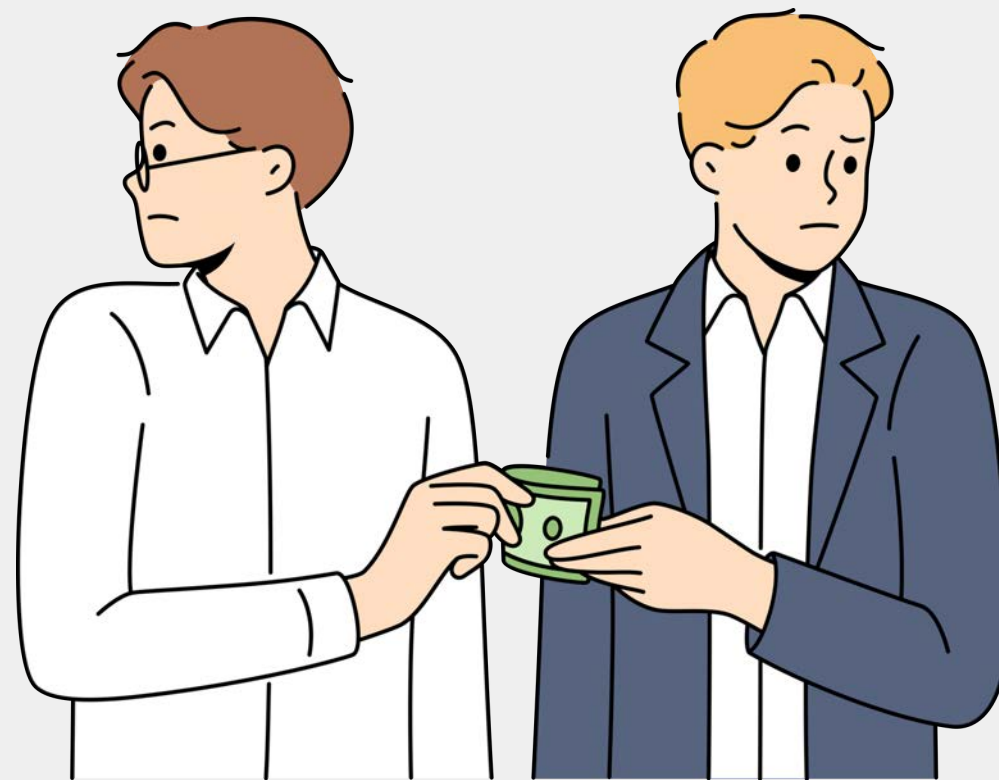


Corruption

Involves two parties — the giver and the receiver.



Falsifying accounts



Corruption

“Corruption” refers to the misuse of one's position, power, or assets for improper purposes, including bribery in any form (offering, promising, demanding, or accepting bribes) to benefit oneself, family, friends, acquaintances, or any other improper benefit. Corruption may include actions that harm the interests of others, such as bribing officials, offering, promising, or accepting bribes in any form, including money, gifts, or services. It also includes actions such as conflicts of interest, concealment of facts, or actions that undermine ethical standards in dealings with government agencies, private sector entities, or any persons directly or indirectly involved, to avoid the performance of their duties as per established procedures.

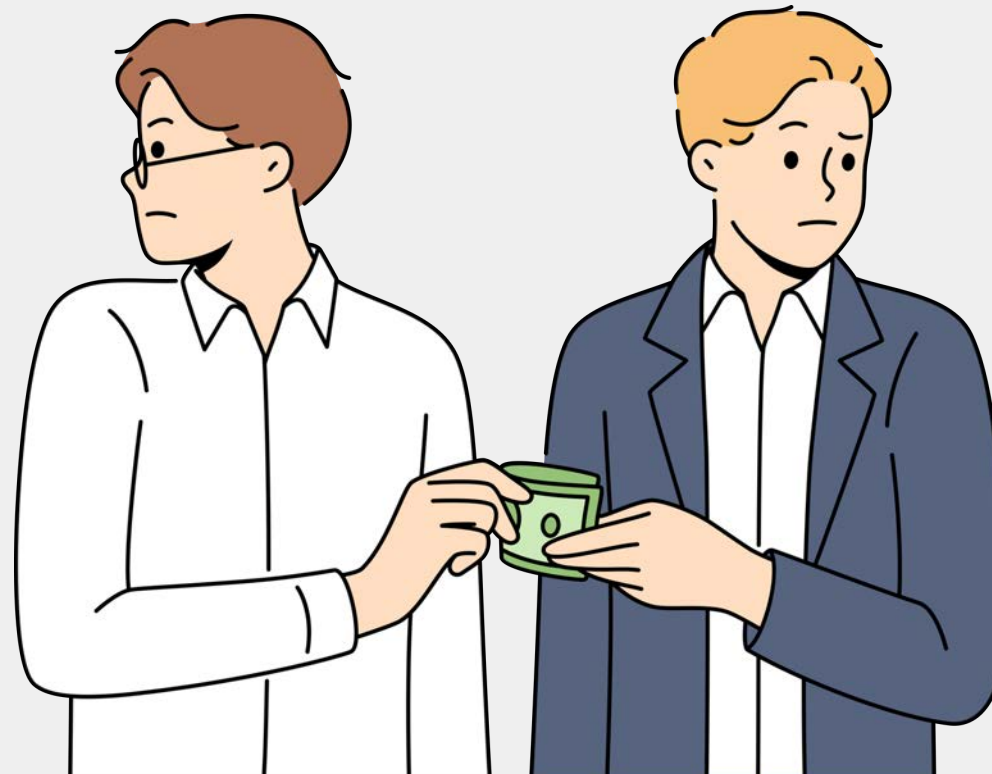
TYPES OF CORRUPTION

Offering or receiving gifts

Business hospitality and
entertainment

Sponsorship

Charitable donations



Employment of government
officials (Revolving Door)

Facilitation payments

Conflict of interest

Political Contribution

TYPES OF CORRUPTION



01

OFFERING OR RECEIVING GIFTS

refers to the act of offering or accepting items, gifts, rewards, cash, privileges, entertainment, services, training, or other forms of compensation with the intent to induce a person to make decisions, take action, or refrain from taking action in a dishonest, unlawful, or unethical manner, in order to obtain personal benefits or facilitate the achievement of desired outcomes.

02

BUSINESS HOSPITALITY AND ENTERTAINMENT

refers to expenditures on activities such as providing meals, beverages, recreational or sports events, or other associated costs, including the provision of business knowledge to external parties. These activities may be perceived as attempts to influence decisions or to establish relationships that could lead to future advantages.

03

SPONSORSHIP

refers to financial, product, or other forms of support given by the Group or received from customers, partners, or other business-related parties. Such support may involve risks of corruption, as it can be linked to giving and receiving bribes to gain competitive advantages.

04

CHARITABLE DONATIONS

refer to the provision of financial support, products, or other forms of assistance to organizations or individuals seeking donations for the purpose of participating in or organizing religious, educational, or public interest activities. Such organizations or individuals may not actually exist but are used as a pretext to serve as a conduit for corruption.

TYPES OF CORRUPTION



05

POLITICAL CONTRIBUTION

refers to giving support or assistance, whether financial or in other forms, to political parties, politicians, individuals with political responsibilities, or political activities. This may be done to gain political favor or influence, either directly or indirectly. Examples include providing goods or services, purchasing tickets for fundraising events, contributing to organizations closely affiliated with political parties, or representing the Company in political campaign activities, among others.

06

CONFLICT OF INTEREST

refers to any action where personal interests or the interests of related parties— whether by family or other relationships—influence impartial decision-making or performance of assigned duties, resulting in obstacles to or conflicts with the Group’s interests. For example, using opportunities or information obtained as an employee for personal gain, running a competing business, or holding outside jobs that affect job performance.

07

FACILITATION PAYMENTS

refer to unofficial payments or benefits, whether monetary or non-monetary, provided to government or private officials to expedite actions or procedures for the Group.

08

EMPLOYMENT OF GOVERNMENT OFFICIALS (REVOLVING DOOR)

refers to the hiring of individuals who currently hold or previously held positions in government to work for the Group, as well as the appointment of Group personnel to roles within the public sector that involve policymaking responsibilities. Such individuals may possess privileged access to information or networks, which, if improperly used, could result in conflicts of interest or corrupt practices.

Potential Impacts on the Company Resulting from Fraud and Corruption



Damage to reputation
and loss of credibility



Loss of business
opportunities



Illegality

Organic Act on Anti-Corruption B.E 2561 (2018)

Section 176



Any person who gives, offers to give, or promises to give any property or benefit to a public official with an intent to induce such person to wrongfully perform, not perform or delay the performance of any duty in his or her office shall be liable to **an imprisonment for a term of not exceeding five years or a fine of not exceeding one hundred thousand Baht or to both.**



In case the offender under paragraph one is a person associated with any juristic person and the action was taken for the benefit of such juristic person, provided that such **juristic person does not have in place appropriate internal control measures to prevent** the commission of such offence, the juristic person shall be deemed to have committed the offence under this Section and shall be liable to **a fine of one to two times of the damages caused or benefits received.**

กฎหมาย ป.ป.ช.
พระราชบัญญัติประกอบรัฐธรรมนูญว่าด้วยการป้องกัน
และปราบปรามการทุจริต พ.ศ.2561 มาตรา 176

สินบน

สินบน = ทรัพย์สิน หรือประโยชน์อื่นๆ แก่
เจ้าพนักงานของรัฐ แม้จะไม่ได้ให้โดยตรง
แต่ให้ผ่านตัวกลาง ก็เป็นความผิด

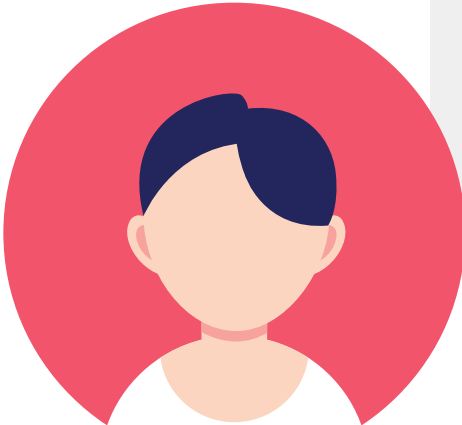
บทลงโทษ

บุคคล
ผู้ให้สินบนแก่เจ้าพนักงานของรัฐ
มีโทษ จำคุกไม่เกิน 5 ปี หรือปรับ
ไม่เกินหนึ่งแสนบาทหรือทั้งจำ
ทั้งปรับ

นิติบุคคล

หากพนักงาน บุคลากรขององค์กร หรือ
บริษัทในเครือ ให้สินบนแก่เจ้าพนักงานของรัฐ
เพื่อประโยชน์ของนิติบุคคลและนิติบุคคลไม่มี
มาตรการควบคุมภายในองค์กร อาจต้องโทษ
ปรับตั้งแต่ หนึ่งเท่า แต่ไม่เกิน สองเท่า ของ
ค่าเสียหายที่เกิดขึ้นหรือประโยชน์ที่ได้รับ

Approaches to Refusing the Offering or Acceptance of Bribes



Refuse by referring to the law



Refer to Section 176 of the Organic Act on Anti-Corruption, B.E. 2561 (2018)



Refuse by referring to the company's policy and the applicable disciplinary measures in the event of a violation.

- **Code of Conduct**
- **Anti-Fraud and Anti-Corruption Policy**



GUIDELINES FOR ANTI-FRAUD AND ANTI-CORRUPTION POLICY

- Directors, executives, and employees of the Group are **prohibited from requesting, engaging in, or accepting corruption or bribery in any form, whether directly or indirectly**, for the benefit of themselves, their families, friends, or acquaintances. This applies to all related units, and compliance with this policy is regularly reviewed to align with changes in regulations, rules, and laws.
- Directors, executives, and employees **must report any actions that could constitute corruption or bribery** within the Group to their supervisors or designated responsible individuals, and must fully cooperate with any investigations to establish the facts.
- **The Group will ensure fairness and protection for those who report corruption or bribery**, as well as for individuals who cooperate in the reporting and investigative process.
- **The Group's board and executives must lead by example in opposing corruption and bribery.** They are responsible for promoting and supporting the anti-corruption policy, ensuring its effective communication to employees and relevant parties. Additionally, they must regularly review the policy and related measures to ensure their suitability and alignment with changes in business conditions, rules, regulations, and legal requirements.



GUIDELINES FOR ANTI-FRAUD AND ANTI-CORRUPTION POLICY

- **Individuals involved in corruption or bribery will face disciplinary action** in accordance with the Group's regulations and may face legal penalties if their actions are illegal.
- The Group **provides training and disseminates knowledge** to directors, executives, and employees to ensure their understanding of and compliance with the anti-corruption policy, promoting ethics, integrity, responsibility, and accountability in the performance of their duties.
- The Group **encourages contractors, suppliers, partners, or other individuals** engaged in activities with the Group **to report any violations of the anti-corruption policy**.
- The Group has established policies for **fair and adequate recruitment, promotion, training, performance evaluation, and compensation of its employees and workers**, with the aim of preventing internal corruption and providing assurance to the Group's employees and workers.
- The Group **conducts risk assessments on fraud and corruption** to identify potential risks within business processes and to establish appropriate mitigation measures. These assessments shall be reviewed periodically as necessary.



GUIDELINES FOR ANTI-FRAUD AND ANTI-CORRUPTION POLICY

- **To ensure clarity in procedures related to high-risk activities that may involve corruption or bribery**, directors, executives, and employees of the Group **must act with caution in the following matters:**
 - **Giving, offering, or receiving gifts and hospitality** must be conducted transparently, in compliance with the law, and consistent with normal business customs or traditions, with reasonable and appropriate value.
 - **Donations or sponsorships** must be transparent, lawful, and not disguised as bribes.
 - **Business operations, negotiations, bidding, and other activities with government or private entities** must be conducted transparently, lawfully, and without bribery at all stages of the business process, including facilitation payments in any form, whether directly or indirectly.
 - Personal **political support, assistance, or donations** are permitted but must not create the appearance or misunderstanding that such activities are conducted on behalf of the Group. The Group maintains a politically neutral stance and does not support any political party, including through the provision of financial assistance or use of company resources.



POLICY

OFFERING OR RECEIVING GIFTS, HOSPITALITY, OR ENTERTAINMENT

Policy

The Group **prohibits soliciting or accepting any gifts, hospitality, or entertainment** from business stakeholders. However, offering or receiving gifts to build or maintain good relationships with business partners under conditions set by the Group is allowed, provided that it is ensured that such an offering or receiving is not a quid pro quo or creates obligations that could lead to bribery or violate laws and the Group's policies.

Practices

- Do not solicit or accept gifts or any benefits from business stakeholders.
- **Offering** gifts, hospitality, or entertainment is allowed under the following conditions:
 - The gift must be given openly on behalf of the company and in compliance with relevant laws. The giving must not be intended to influence, induce, or repay any individual in order to gain an unfair advantage or covertly seek assistance or benefits that should not be obtained.
 - The gift is given on traditional occasions or as a gesture of social courtesy.
 - The gift is exchanged or presented during formal events such as contract-signing ceremonies, company visits, or when serving as a speaker for the Group.
 - Any offering of gifts, hospitality, or entertainment must be approved by authorized individuals in accordance with the Group's approval authority regulations.



POLICY

OFFERING OR RECEIVING GIFTS, HOSPITALITY, OR ENTERTAINMENT

Practices



- **Receiving** gifts, hospitality, or entertainment is allowed under the following conditions:
 - The gift is received on traditional occasions or as a gesture of social courtesy, provided that it does not influence any business decisions of the recipient.
 - The gift must not exceed a value of **3,000 Baht per instance per giving organization**. If the value exceeds this limit and the recipient is unable to decline it, the recipient must inform their supervisor, report the receipt of the gift, and hand it over to the Human Resources department for redistribution to employees, donation to charity on behalf of the Group, or in other appropriate ways.

For detailed procedures regarding the receipt of gifts, hospitality and entertainment, please refer to **"Anti-Fraud and Anti-Corruption Policy"**



FORM

FOR THE RECEIPT OF GIFTS, HOSPITALITY, OR ENTERTAINMENT

Attachment 2-1: Gift Receipt Report Form (For Gifts Valued Not Exceeding 3,000 Baht / instance / Donor)

To: (Supervisor)..... Position.....
I, (Mr./Mrs./Ms.).....
Position:..... Department:..... Tel:.....
would like to report the receipt of a gift with an estimated value not exceeding 3,000 Baht, in accordance with the Anti-Fraud and Anti-Corruption Policy.

Received on (date):..... From:.....

Relationship with the Group as :..... Details of the gift are as follows:

Details of Gift	Estimated Value	Reason for Receiving	Action Taken
			☐ Retained for personal benefit ☐ Shared with Colleagues ☐ Submitted to the HR Department ☐ Other (please specify):.....
			☐ Retained for personal benefit ☐ Shared with Colleagues ☐ Submitted to the HR Department ☐ Other (please specify):.....
			☐ Retained for personal benefit ☐ Shared with Colleagues ☐ Submitted to the HR Department ☐ Other (please specify):.....

Supervisor's Opinion

- ☐ Permitted to retain for personal benefit / share with colleagues
☐ Not permitted to retain for personal benefit / share with colleagues; the item must be submitted to the HR Department
☐ Agreed and approved for submission to the HR Department

Signature.....
(.....)
Date.....

Signature..... Reporter
(.....)
Date.....

For Human Resources Department (if submission to the HR Department is approved)

Document No.:.....

The Human Resources Department has received gifts valued not exceeding 3,000 Baht as reported above and has taken the following actions regarding these gifts:

- ☐ Conducted a raffle or distributed the gifts to employees in the Department/Division:.....
☐ Donated to charity in the name of the Group (please specify the recipient organization):.....
☐ Others (please specify):.....

Signature.....
(.....)
Position.....
Date.....

Attachment 2-2: Gift Receipt Report Form (For Gifts Valued Exceeding 3,000 Baht / instance / Donor)

To: Human Resources Department Department/Division:

I (Mr./Mrs./Ms.).....

Position:..... Department:..... Tel:.....

would like to report the receipt of a gift with an estimated valued exceeding 3,000 Baht, in accordance with the Anti-Fraud and Anti-Corruption Policy.

Received on (date):..... From:.....

Relationship with the Group as :..... Details of the gift are as follows:

Details of Gift	Estimated Gift Value	Reason for Receiving

Reporter/Gift Recipient

Signature.....
(.....)
Position.....
Date.....

Supervisor

Signature.....
(.....)
Position.....
Date.....

For Human Resources Department

Document No.:.....

The Human Resources Department has received gifts valued exceeding 3,000 Baht as reported above and has taken the following actions regarding these gifts:

- ☐ Conducted a raffle or distributed the gifts to employees in the Department/Division:.....
☐ Donated to charity in the name of the Group (please specify the recipient organization):.....
☐ Others (please specify):.....

Signature.....
(.....)
Position.....
Date.....



POLICY

SPONSORSHIP AND CHARITABLE DONATIONS

Policy

The Group has **a policy that giving or receiving any sponsorship or charitable donations must be conducted transparently and in compliance with the law.** It must be ensured that such giving or receiving is not used as a cover for bribery, does not improperly influence business decisions, or does not provide an unfair competitive advantage.

Practices



- Any sponsorship or charitable donation **must be demonstrably used to support a project that genuinely contributes to achieving its objectives and generates tangible societal benefits** or supports responsible operations aligned with corporate social responsibility principles. Additionally, such activities must comply with applicable laws, adhere to business ethics, and conform to good corporate governance principles.



POLICY

SPONSORSHIP AND CHARITABLE DONATIONS

Practices



- Any sponsorship or charitable donation **must be quantifiable in monetary terms**, such as providing accommodation or meals. It must not involve any benefits in return for individuals or entities, except for honorary recognition in accordance with customary business practices.
- Any sponsorship or charitable donation **must clearly outline its purpose and details of the request, and must be approved by authorized individuals** in accordance with the Group's approval authority regulations.
- Any sponsorship or charitable donation **must be traceable, with official receipt or confirmation documentation from the requesting entity** to support disbursement processes and to ensure that expenses remain within the approved budget

For detailed procedures regarding Sponsorships or Charitable Donations, please refer to ["Anti-Fraud and Anti-Corruption Policy"](#)



FORM

REQUEST FOR APPROVAL OF SPONSORSHIP OR CHARITABLE DONATIONS

Attachment 3: Approval Form for Sponsorships or Charitable Donations

Part 1 For Requestor

Internal Requesting Department _____ Date _____

Requested Amount _____ Baht or Requested Items:

1. _____ 2. _____ 3. _____

4. _____ 5. _____ 6. _____

(Total Quantity: _____ items; Total Value _____ Baht)

Details of the Donation/Support Recipient:

☐ Government Agency / State Enterprise	☐ Foundation, Charitable Organization, Temple, Hospital, Educational Institution	☐ Other (please specify): _____
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Details/Reason for Approval Request:

Purpose: ☐ Donation ☐ Sponsorship ☐ Other (please specify) _____

Reason: _____

Supporting evidence for Approval (e.g., project details, duration, activity plan, primary responsible person)

☐ Attached – Please specify: _____

☐ Attached – Please specify: _____

Verification of the existence of the donation/support recipient:

☐ Exists (Reference from) _____ ☐ Cannot be verified

Signature _____ Requestor

(_____)

Position _____

Date _____

Part 2: For Authorized Approver

Supervisor's Opinion _____ _____ _____ Signature _____ (_____) Date _____	Chief Executive Officer (CEO)'s Opinion ☐ Approved ☐ Not Approved _____ Signature _____ (_____) Date _____
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POLICY

POLITICAL CONTRIBUTION



Policy

The Group maintains a neutral stance on politics and does not support or engage in any actions that favor any political party, including providing financial assistance, resources, or any assets, either directly or indirectly, to individuals involved in political affairs. However, the Group respects individuals' rights to exercise their political freedoms under democratic laws.

Practices



- Directors, executives, and employees of the Group **are entitled to freely participate in or support political activities on a personal basis. However, they must not use their corporate position, company property, equipment, or resources for any political purposes.** They must ensure that no action is taken that may create the misunderstanding that the Group supports, endorses, or favors any political party. For example, they must not wear company uniforms, display company logos, or use any corporate identification while engaging in political activities. All political activities must be conducted outside of the Group's working hours.

POLICY

POLITICAL CONTRIBUTION

Practices

- Directors, executives, and employees are **prohibited from using their authority to persuade, pressure, coerce**, or otherwise influence colleagues or subordinates to participate in or support any political activity.
- **Political expressions or opinions should be avoided in the workplace** to prevent ideological conflicts or differences in opinion.
- **Advertising or campaigning for political purposes within the company is prohibited**, including any political activities benefiting any specific party.
- **If an individual wishes to participate in, support, or engage in any political activities, and if such actions could be misconstrued as corruption concealed in the form of political support, they must report such activities to their supervisor for prior approval.** This report must include details such as the name of the political party or recipient of political assistance, the purpose of the political assistance, and supporting documents (if any). The supervisor will review the report to ensure that such actions do not resemble hidden corruption, and the approval must be documented and submitted to the Human Resources department to be recorded in the "Political Contribution Report"



POLICY

CONFLICT OF INTEREST PREVENTION

Policy

The Group has established a policy on conflict of interest prevention, based on the principle that **all decisions related to business activities must be made in the best interests of the company, its subsidiaries, and its shareholders. Actions that could result in a conflict of interest should be avoided** to ensure fairness for all stakeholders.

Practices



- **Avoid engaging in transactions involving oneself or related parties** that may create a conflict of interest with the company and/or its subsidiaries.
- If it is necessary to enter into a transaction involving oneself or related parties for the best interest of the company and/or its subsidiaries, the transaction must be treated as if it were being conducted with an external party. Directors, executives, or employees with a vested interest in such a transaction must not participate in its consideration or approval process, and they must not have the authority to approve such transactions.



POLICY

CONFLICT OF INTEREST PREVENTION

Practices



- **Do not seek personal gain or benefit for oneself or others** by using or disclosing confidential or unpublished internal information.
- **Do not use any documents or information obtained** from being a director, executive, or employee of the company or its subsidiaries **for personal business or for others' businesses that are in competition or have a similar relationship to the company or its subsidiaries.**

For more information, please refer to
[“Anti-Fraud and Anti-Corruption Policy”](#)



POLICY

FACILITATION PAYMENTS



Policy

The Group has a policy prohibiting the offering and acceptance of any form of facilitation payment, whether directly or indirectly, to government or private sector officials.



Practices

- Directors, executives, and employees **are prohibited from offering or acceptance to any facilitation payment to government or private sector officials, whether directly or indirectly**, that may aim to expedite operations through fraudulent means or may lead to corruption.
- Directors, executives, and employees **who are responsible for liaising with government or private sector officials must conduct their activities transparently and strictly adhere to all applicable laws and regulations.**

POLICY

EMPLOYMENT OF GOVERNMENT OFFICIALS (REVOLVING DOOR)

Policy

The employment of individuals who currently hold or formerly held government positions to work for the Group, or the appointment of Group personnel to public sector roles involving policymaking responsibilities, may pose risks. Their privileged access to information or networks, if misused, could result in conflicts of interest or corrupt practices. Therefore, the Group has established a policy regarding the employment of government officials in roles such as directors, executives, employees, or consultants. Such individuals are required to undergo a selection process and background verification to ensure transparency.

Practices

- The recruitment or appointment of current or former government officials as directors, executives, consultants, or employees of the Group is permitted only after a background check has been conducted. This check must cover their work history, positions held, and the circumstances surrounding their departure from government service. The results of the check must align with the Group's operational procedures, and any legally mandated cooling-off period must be observed. This process ensures that such employment or appointment is not perceived as a reward for obtaining any benefits for the Group and effectively prevents potential conflicts of interest.



POLICY

EMPLOYMENT OF GOVERNMENT OFFICIALS (REVOLVING DOOR)

Practices



- To ensure transparency in appointments, the Group will **disclose the backgrounds of individuals who were former government officials and have been appointed as board members or executives** of the company or its subsidiaries, through official documents or other communication channels of the Group.

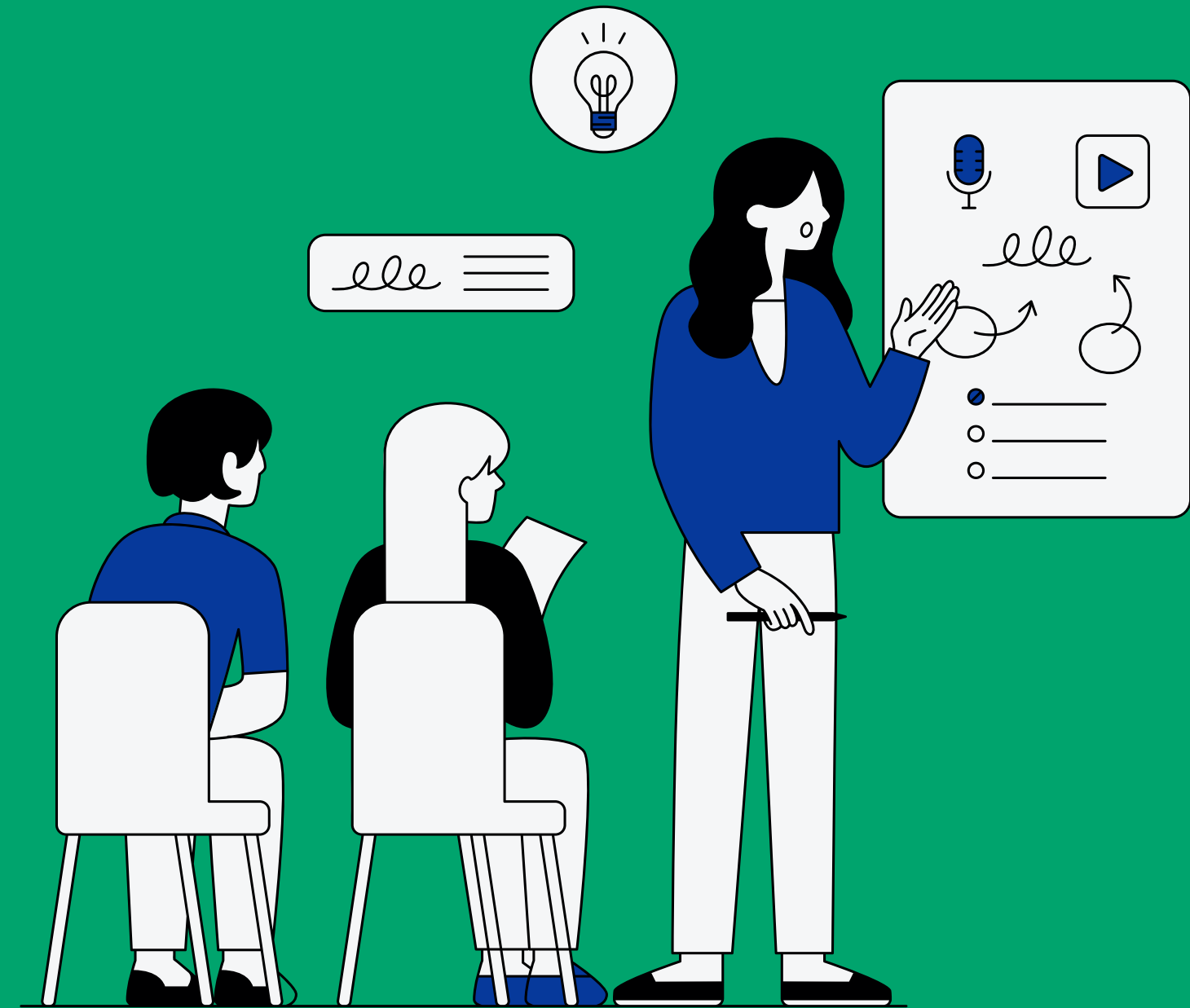
“Company Executives” refers to managers or those in management positions ranked 4th or higher, including those in finance or accounting management positions at the level of department manager or equivalent, as defined in the Securities and Exchange Commission's Announcement No. Tor Chor 23/2551, issued pursuant to Section 89/1 of the Securities and Exchange Act B.E. 2535 (1992).

“Subsidiary Executives” has the same meaning as "Company Executives."

- **If any personnel from the Group takes a policymaking role in the government, the Group will disclose their details**, including the reasons for accepting the position or serving in such a role.



Part 3 Training and Communication



Approach to Training and Communication of the Code of Conduct and Policies



- Employee Training
- New Employee Orientation



HRIS : Internal System

A pop-up feature displays all organizational policies upon first login, requiring users to read and acknowledge them. Policies are also stored in the system for access at any time.



ACE Website

Access to policies via the company website (www.ace-energy.co.th)



Various channels to communicate with employees, such as WhatsApp Groups, Videos, and PR boards



Communication and Training on the Code of Conduct, Human Rights, and Anti-Corruption



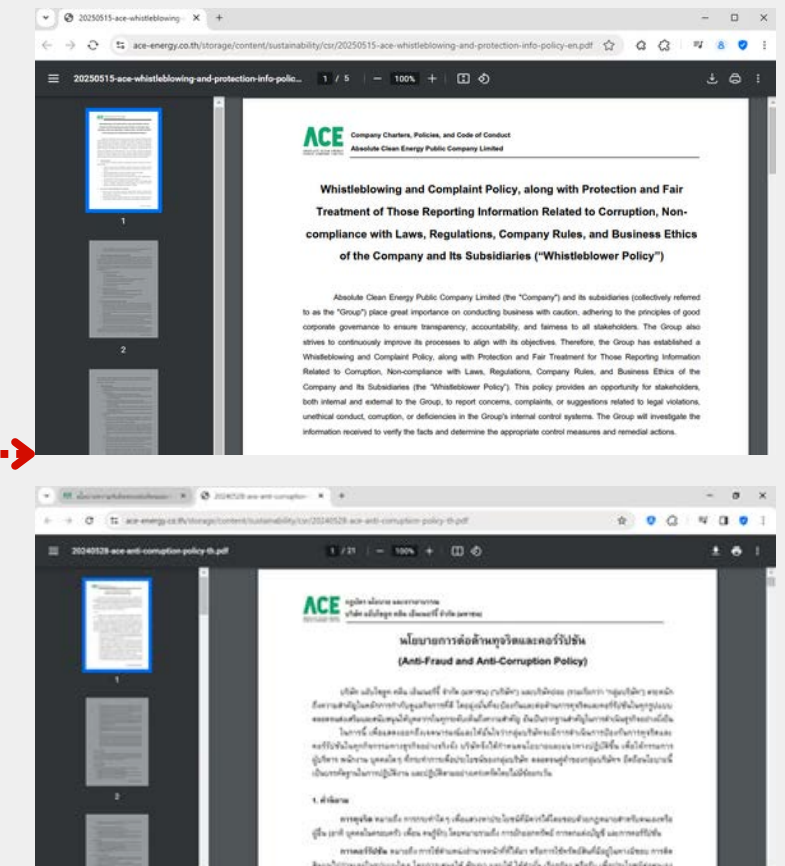
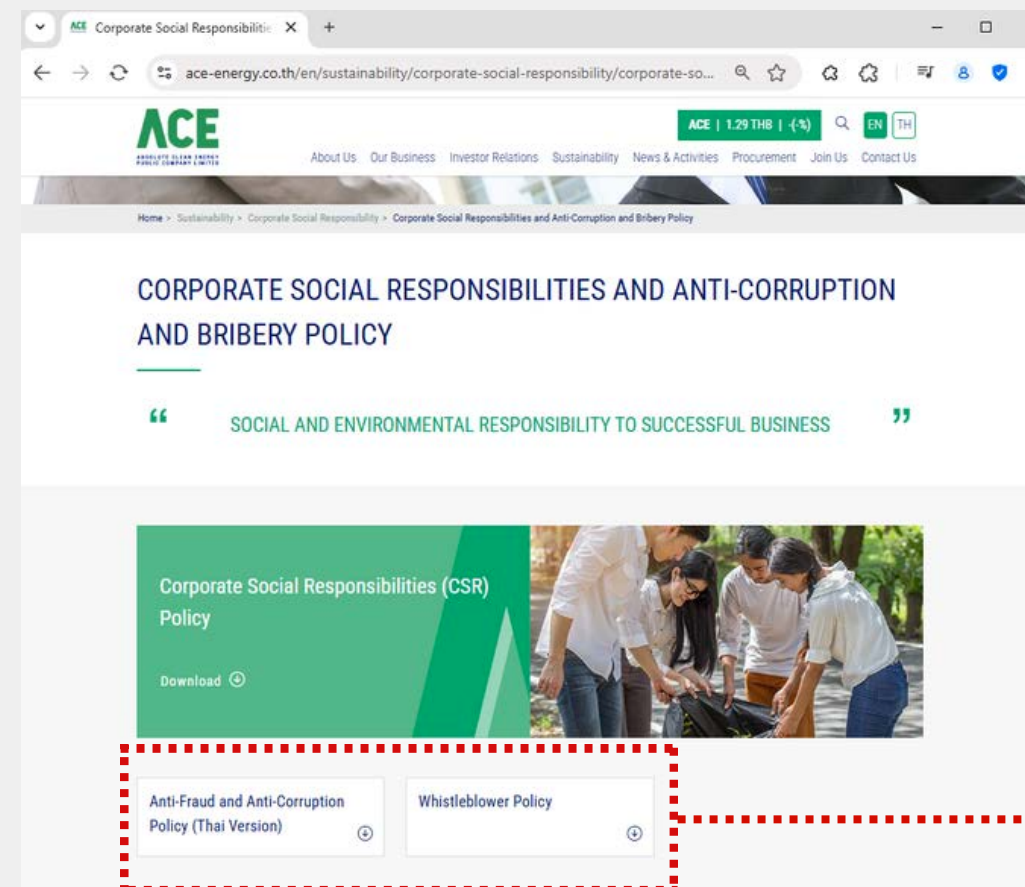
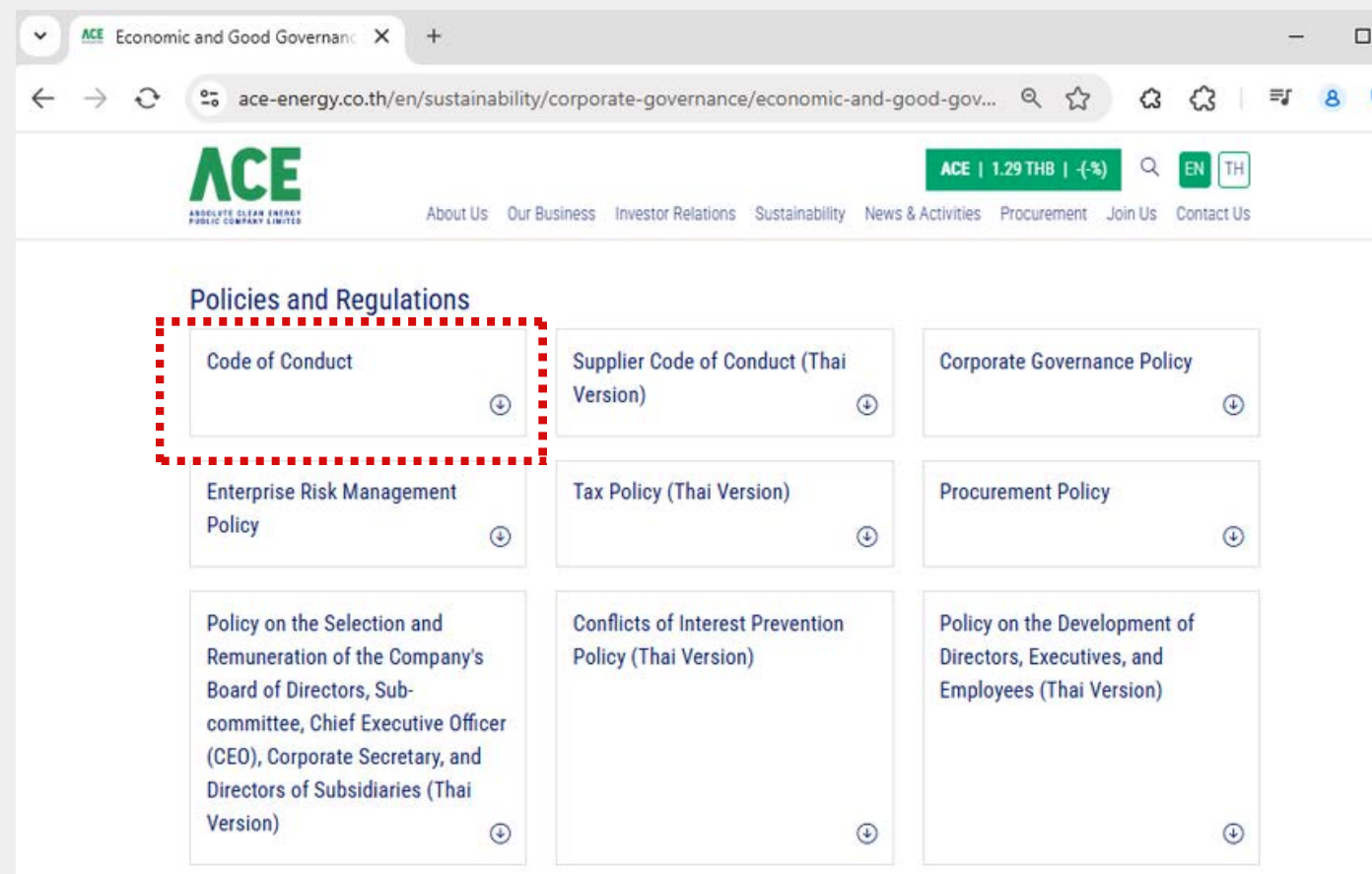
Scope of communication and Training covers the following topics:

- Code of Conduct and Practices
- Human Rights Violations
- Anti-Fraud and Anti-Corruption
 - Overview of the Anti-Fraud and Anti-Corruption Policy
 - Definitions and Types of Corruption, including Bribery
 - Guidelines for Compliance with the Anti-Fraud and Anti-Corruption Policy and Supporting Policies
- Disciplinary Actions and Penalties
- Channels for Reporting Whistleblowing and the Investigation Process for Complaints Received
- Protection for Whistleblowers, Complainants, and Individuals who refuse to engage in Corruption

Approach to Communication

1. Official Policy Announcement

- Disclose policies and guidelines to the public via the company website (www.ace-energy.co.th)

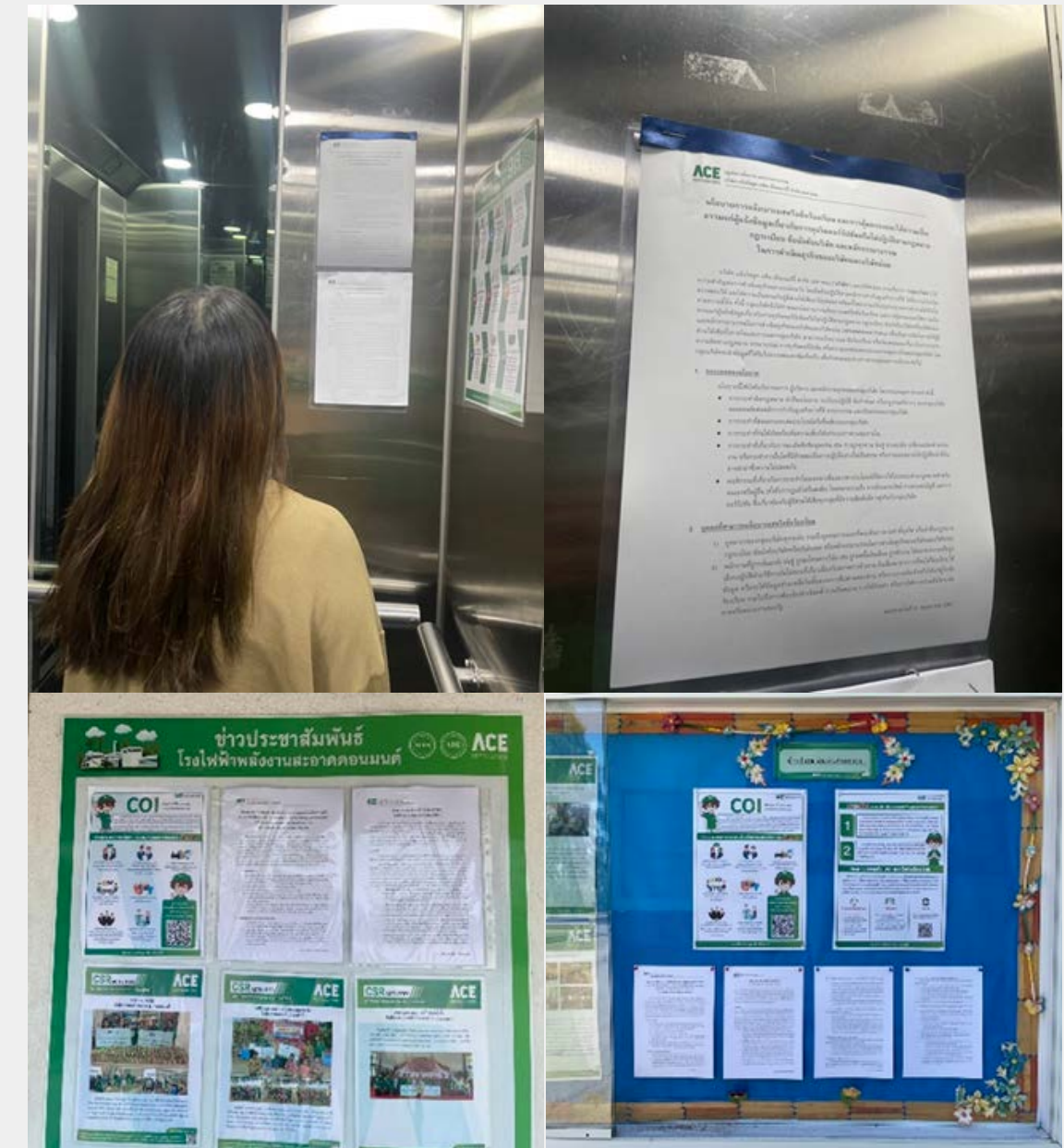


Approach to Communication

2. Internal Communication

Communication of policies to personnel of the Company, including subsidiaries, affiliates, or other companies under the Company's control, is as follows:

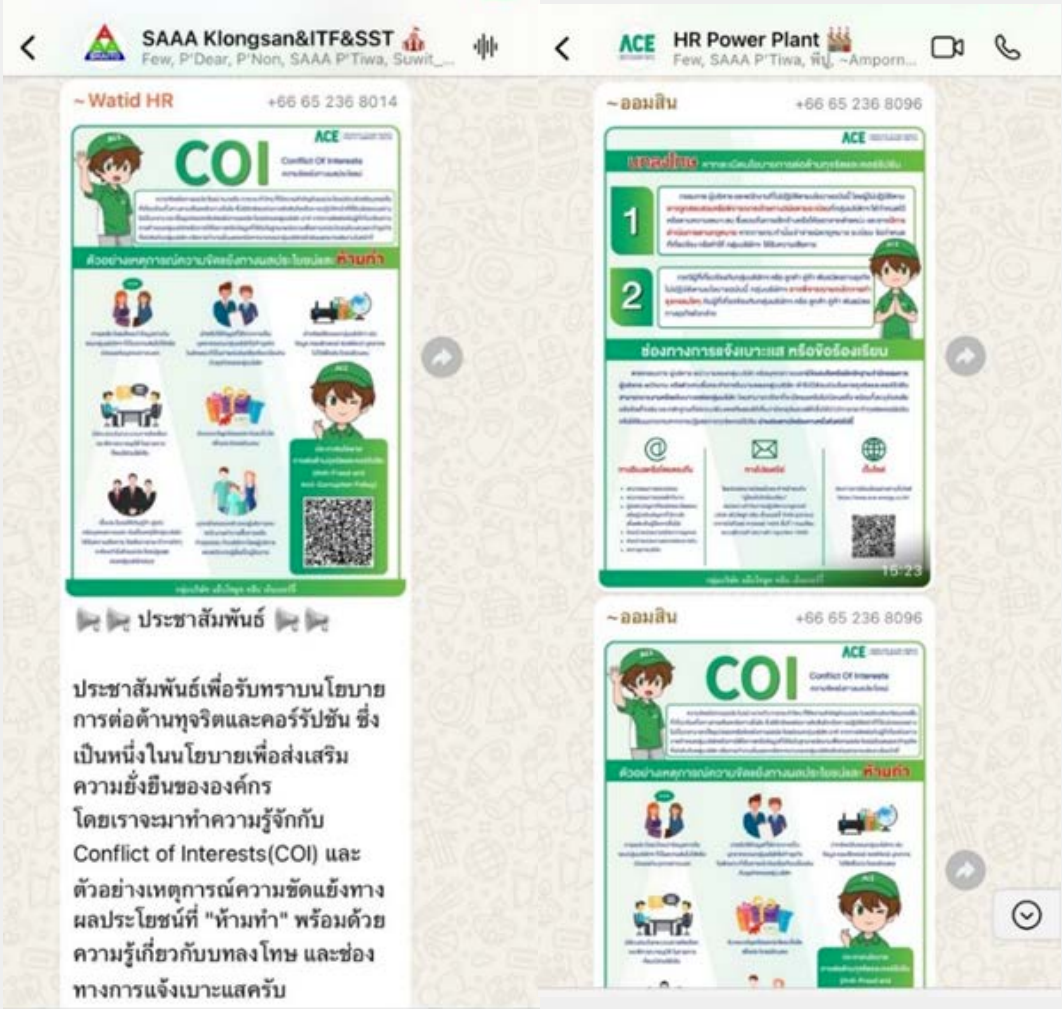
- **Workplace Communication:** The Code of Conduct, the Human Rights Policy, the Anti-Fraud and Anti-Corruption Policy, and other relevant policies will be posted on the central and departmental announcement boards.
- **Digital systems:** Information regarding the Code of Conduct and policies will be distributed through various electronic systems, such as WhatsApp groups, HRIS (internal system), email, the company website (www.ace-energy.co.th), and other appropriate channels.
- **Infographics:** Infographics will be provided to emphasize policies and communicated periodically.



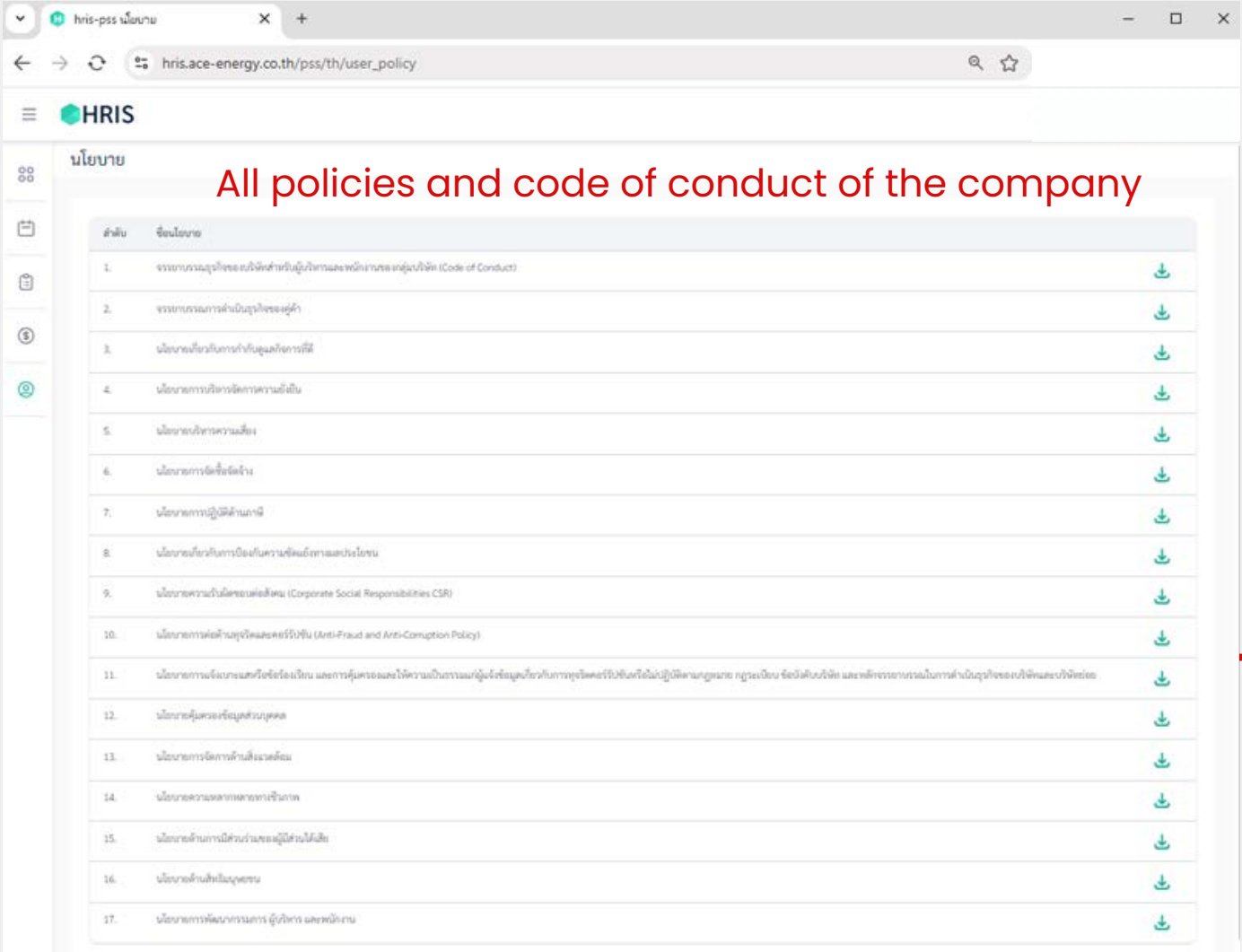
Central Announcement Boards.

Approach to Communication

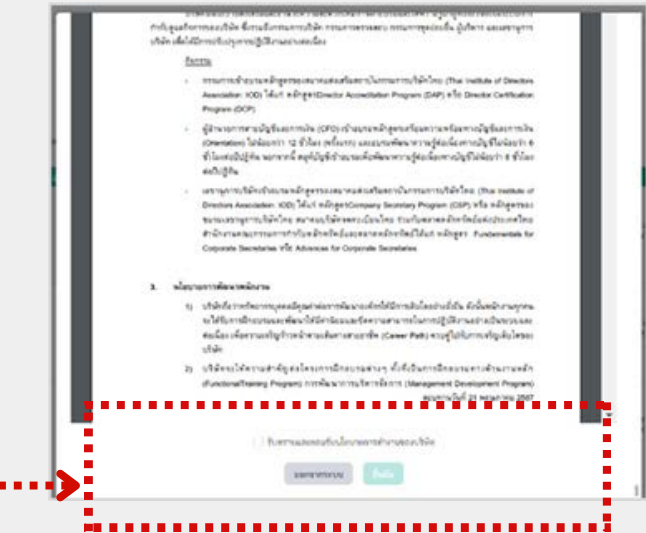
2. Internal communication (Continued)



WhatsApp groups



Display upon first login

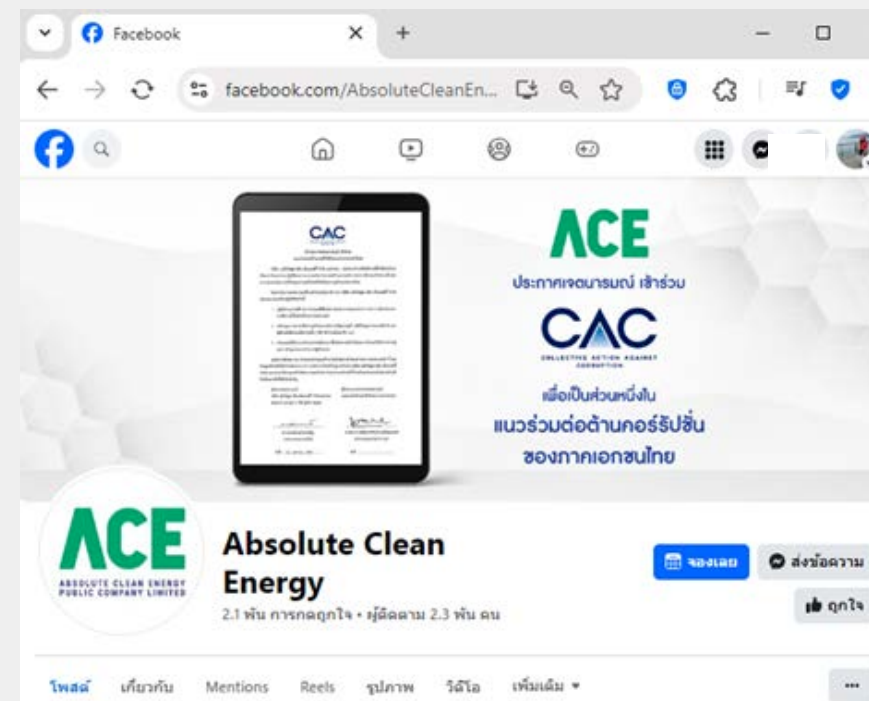


HRIS (Internal System) : A pop-up feature displays all organizational policies upon first login, requiring users to read and acknowledge them. Policies are also stored in the system for access at any time.

Approach to Communication

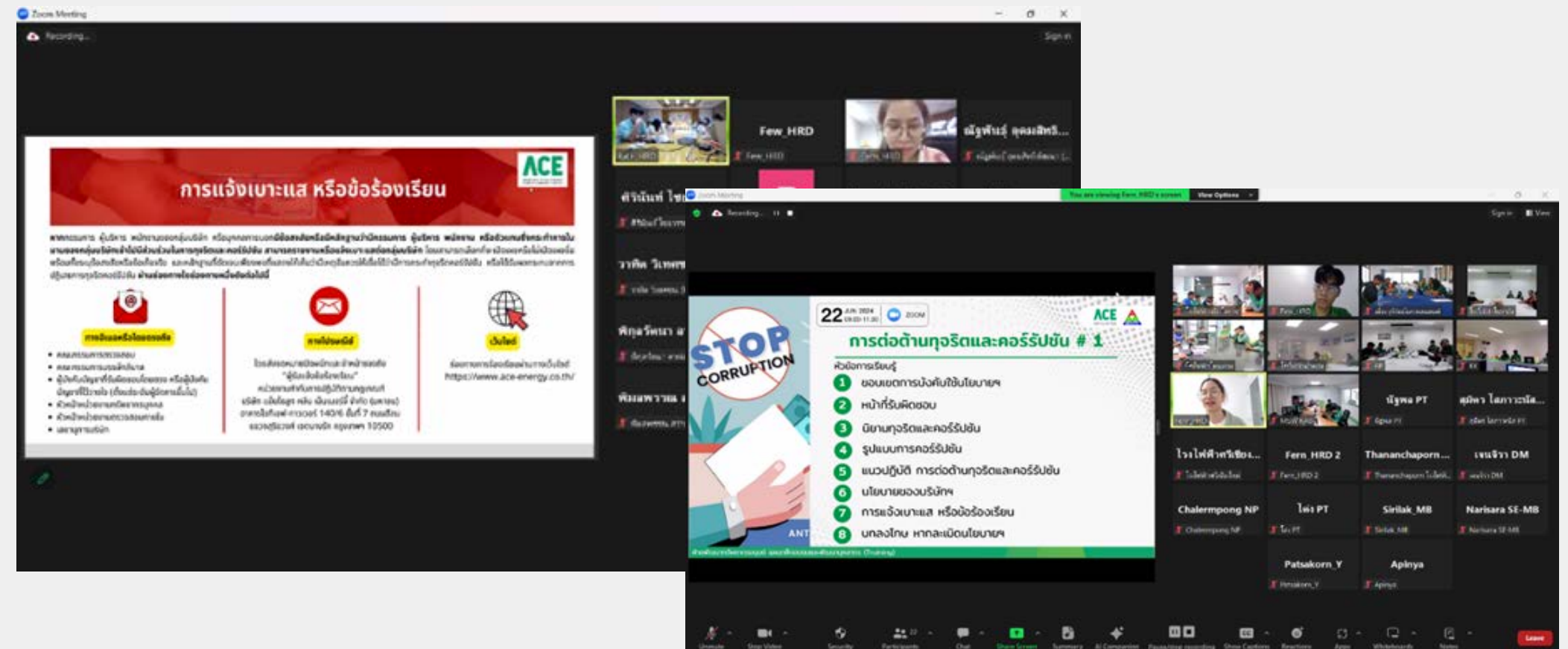
3. Communication to Stakeholders

- The Group will communicate its policy and whistleblowing or complaint channels to external stakeholders (e.g., business representatives, partners, contractors, and government agencies) at the start of the business relationship or thereafter, as appropriate, through designated channels such as policy attachments in contracts, email, or other suitable means.
- Social Media such as the official Facebook pages of the company and its subsidiaries.

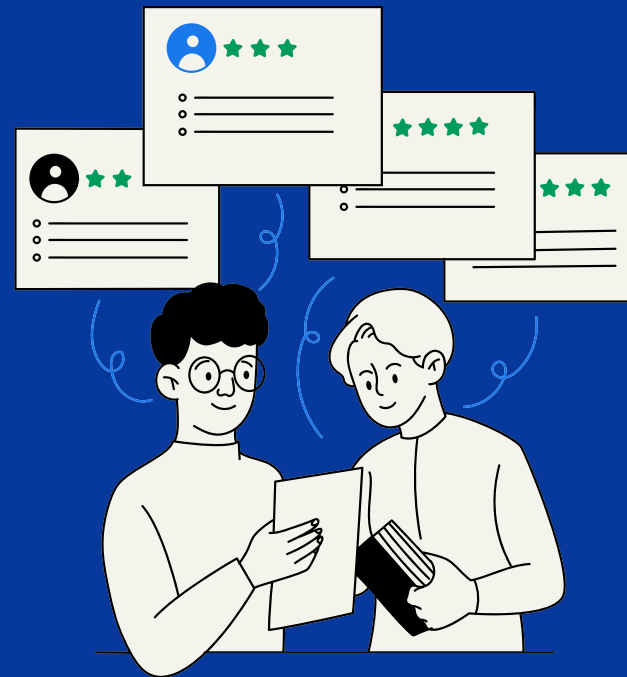


Approach to Training

- **New Personnel Orientation** : Policy training and relevant information are included as part of the onboarding program for all new hires at all levels, with a test conducted to assess their understanding.
- **Ongoing Training and Seminars**
 - Provide continuous training for current executives and employees through online systems or e-learning platforms.
 - Implement Intensive training programs for departments facing higher risks
 - Assess understanding to enhance knowledge and raise awareness



Part 4 Whistleblowing and Complaints



- Scope of whistleblowing and/or complaints
- Persons who Can Report Whistleblowing or Complaints
- Channels or Recipients for Whistleblowing and Complaints
- Process Upon Receiving Whistleblowing Reports or Complaints
- Protection of Whistleblowers
- Penalties
- Remedial Measures

This policy can be accessed at

<https://www.ace-energy.co.th/storage/content/sustainability/csr/20240528-ace-whistleblowing-and-protection-info-policy-th.pdf>

Scope of whistleblowing and/or complaints



- Violations of laws, policies, rules, regulations, or guidelines of the group of companies, as well as actions that contradict corporate governance principles, business ethics, and the group's code of conduct.
- Actions that negatively affect the interests or reputation of the group of companies.
- Actions that create or increase risks to the internal control system.
- Actions involving human rights violations, such as harassment, threats, abuse, job displacement, or any unfair treatment, or tasks assigned that may result in unsafe conditions.
- Intentional behaviors aimed at unlawfully obtaining benefits for oneself or others (whether already occurred or suspected), including theft, accounting manipulation, and corruption involving all stakeholders with business relationships with the group of companies.

Persons who Can Report Whistleblowing or Complaints



- Personnel at all levels of the group of companies, including external individuals who witness actions involving corruption or violations of laws, regulations, company rules, or the business code of conduct of the company and its subsidiaries.
- Employees who are harassed, threatened, disciplined (e.g., salary deductions, suspension, dismissal, or unfair treatment related to employment conditions) due to their reporting, providing information, or assisting in investigations or fact-finding for the whistleblower recipient, including lawsuits, being a witness, giving testimony, or cooperating with courts or government agencies.

Channels or Recipients for Whistleblowing and Complaints

If anyone has suspicions or evidence that any directors, executives, employees, or representatives acting on behalf of the Group are involved in fraud or corruption, they may report or provide a tip-off to the Group. They may choose to disclose their identity or remain anonymous while providing details of the suspicion or facts, along with clear and sufficient evidence to reasonably support the belief that fraud or corruption has occurred or that they have suffered from refusing to engage in such activities. Reports can be made through one of the following channels:



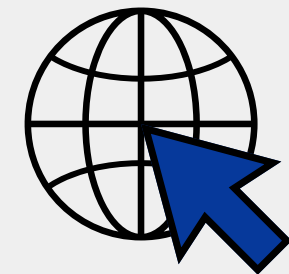
Email or directly to:

- The Audit Committee
- The Corporate Governance Committee
- Direct supervisors or trusted supervisors (from manager level and above)
- Head of the Human Resources Department
- Head of the Internal Audit Department
- Company Secretary



By mail:

Send a sealed letter addressed to the
"Complaint Recipient"
Compliance Department
Absolute Clean Energy Public Company Limited
ITF Tower, 140/6, 7th Floor, Silom Road,
Suriyawong, Bangrak, Bangkok 10500, Thailand



ACE Website

Complaint submission via the website:
<https://www.ace-energy.co.th/>

ช่องทางการร้องเรียนหรือขอคำปรึกษา



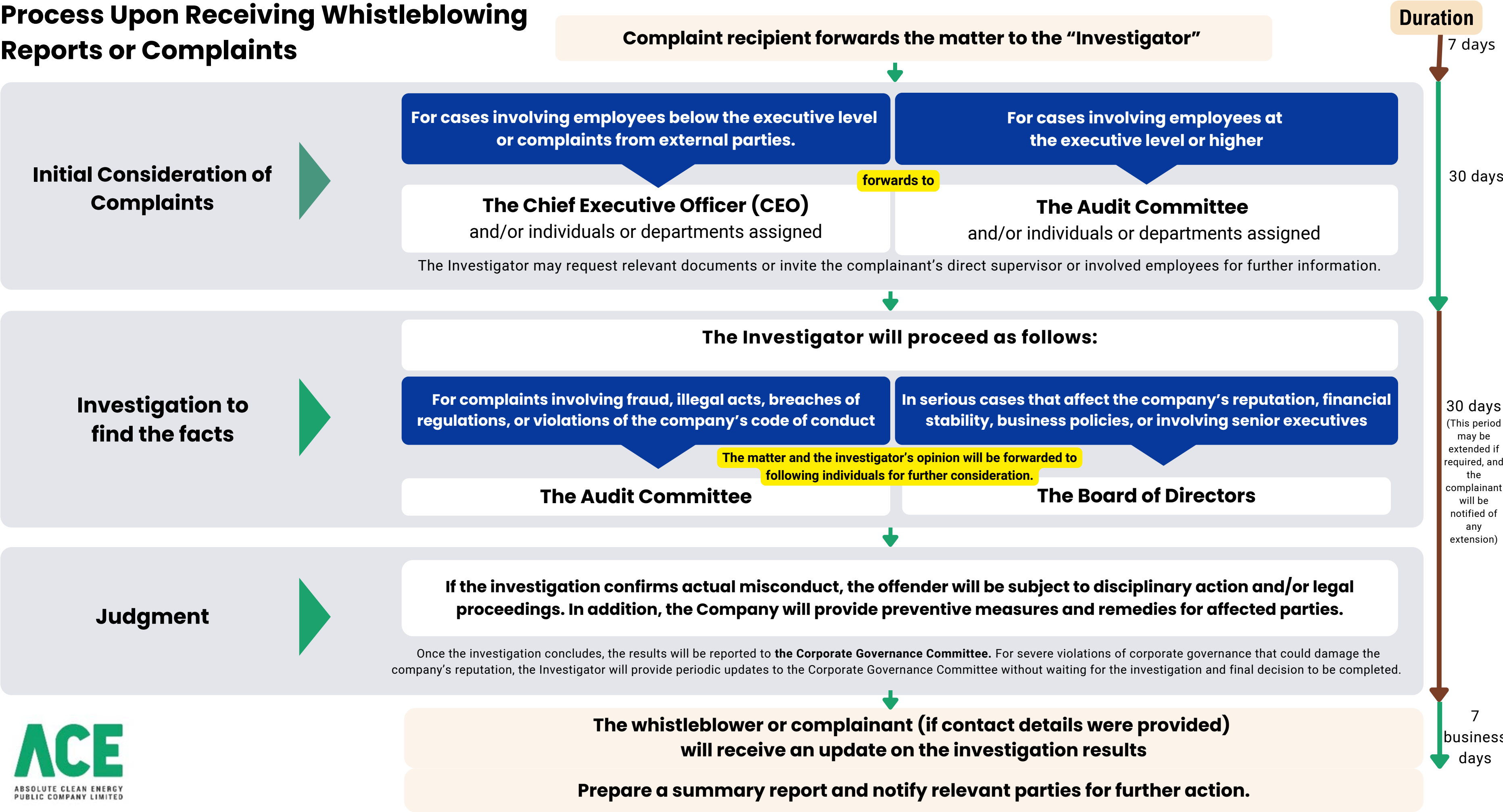
ช่องทาง	อีเมล / ที่อยู่	ร้องเรียน	ขอคำปรึกษา	ภายใน	ภายนอก
อีเมลหรือโดยตรง					
คณะกรรมการตรวจสอบ	โดยตรง หรือส่งที่อีเมลฝ่ายตรวจสอบภายใน : ia_head@ace-energy.co.th โดยระบุถึง "คณะกรรมการตรวจสอบ"	✓		✓	✓
คณะกรรมการบรรษัทภิบาล (อยู่ระหว่างการสรรหาและแต่งตั้ง)	โดยตรง หรือส่งที่อีเมลฝ่ายตรวจสอบภายใน ia_head@ace-energy.co.th โดยระบุถึง "คณะกรรมการบรรษัทภิบาล" ***เบื้องต้นให้ฝ่ายตรวจสอบภายในเป็นผู้รับเรื่อง โดยภายหลังจากแต่งตั้ง คณะกรรมการชุดนี้เรียบร้อยแล้ว จะมีการกำหนดผู้รับเรื่องและอีเมลต่อไป***	✓		✓	✓
ผู้บังคับบัญชาที่รับผิดชอบโดยตรง หรือ ผู้บังคับบัญชาที่ไว้วางใจ (ตั้งแต่ระดับ ผู้จัดการขึ้นไป)	ตามอีเมลและเบอร์โทรศัพท์ของผู้บังคับบัญชาแต่ละท่าน ใน Contact list ของระบบ My pass	✓	✓	✓	
หัวหน้าหน่วยงานทรัพยากรบุคคล	ตามอีเมลของแต่ละท่าน ดังนี้ 1. คุณรุ่งทิพย์ ฉายวิมล ผู้จัดการฝ่ายบริหารทรัพยากรมนุษย์ อีเมล : roongtip_c@ace-energy.co.th, โทร : 084-4395258 2. คุณบุษงค์ ศิริวัฒน์ ผู้จัดการฝ่ายบริหารทรัพยากรมนุษย์ อีเมล : puchong_s@aed-th.com, โทร : 061-1756845 3. คุณทิวา เทียนเบญจะ ผู้จัดการฝ่ายบริหารทรัพยากรมนุษย์ อีเมล : tiwa_t@ace-energy.co.th, โทร : 084-3562678 4. คุณวันวิสา จันดา ผู้จัดการฝ่ายบริหารทรัพยากรมนุษย์ อีเมล : wanvisa_j@saaa.co.th, โทร : 065-5093897	✓	✓	✓	
หัวหน้าหน่วยงานตรวจสอบภายใน	ส่งที่อีเมล : ia_head@ace-energy.co.th โดยมีผู้ดูแลคือ 1. คุณปัญธิกา จิตรพินิจ ผู้จัดการฝ่ายตรวจสอบภายใน อีเมล : panchika_j@ace-energy.co.th, โทร : 085-4895377 2. คุณภาวิณี กงทัพ ผู้จัดการแผนกตรวจสอบภายใน อีเมล : pavinee_p@ace-energy.co.th, โทร : 081-1394584	✓	✓	✓	✓
เลขานุการบริษัท	โดยตรงหรือ ส่งถึง คุณชยันนาท บัวทอง อีเมล : chainat_b@ace-energy.co.th โทร : 081-8709430	✓	✓	✓	✓

ช่องทางการร้องเรียนหรือขอคำปรึกษา

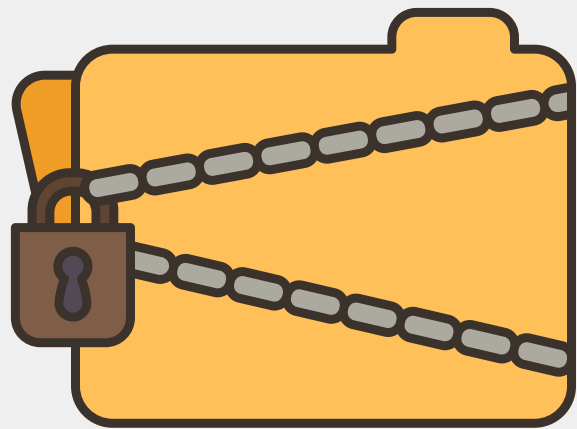


ช่องทาง	อีเมล / ที่อยู่	ร้องเรียน	ขอคำปรึกษา	ภายใน	ภายนอก
ทางไปรษณีย์					
โดยส่งจดหมายปิดผนึกและจำหน่ายซองถึง "ผู้รับแจ้งข้อร้องเรียน" หน่วยงานกำกับ การปฏิบัติตามกฎเกณฑ์	บริษัท แอ็บโซลูท คลีน เอ็นเนอร์จี จำกัด (มหาชน) อาคารไอทีเอฟ-ทาวเวอร์ 140/6 ชั้นที่ 7 ถนนสีลม แขวงสุริยวงศ์ เขตบางรัก กรุงเทพฯ 10500	✓	✓	✓	✓
ผ่านเว็บไซต์ ACE					
ช่องทางการร้องเรียนผ่านทางเว็บไซต์ https://www.ace-energy.co.th	ข้อมูลที่ได้รับจะส่งไปถึง อีเมล : ia_head@ace-energy.co.th ซึ่งมี ผู้ดูแลคือ 1. คุณปัญธิกา จิตรพินิจ ผู้จัดการฝ่ายตรวจสอบภายใน อีเมล : panchika_j@ace-energy.co.th, โทร : 085-4895377 2. คุณภาวิณี กงทัพ ผู้จัดการแผนกตรวจสอบภายใน อีเมล : pavinee_p@ace-energy.co.th, โทร : 081-1394584	✓	✓	✓	✓

Process Upon Receiving Whistleblowing Reports or Complaints



Protection of Whistleblowers



- **The Group will keep the whistleblower's or complainant's name, address, or any identifiable information strictly confidential.** Such information will be disclosed only to personnel responsible for investigating the complaints or as required by law.
- **Disciplinary measures are in place for any responsible parties who leak or disclose information related to whistleblowers or complainants** at any stage of the process involving the receipt and investigation of whistleblowing or complaints.

- **If the complainants believe they may face danger or suffer harm, they can request additional appropriate protective measures** from the company or its subsidiaries. The company may also implement such measures on its own initiative, even without a formal request from the complainants, if the situation appears likely to cause harm or danger.
- **Those who suffer harm or adverse impacts will receive appropriate and fair remedies** from the company.
- The Group will **not demote, punish, or impose negative consequences** on directors, executives, or employees who refuse to engage in fraud or corruption, even if such refusal results in lost business opportunities to the company.

Penalties

01

The group company establishes penalties for directors, executives, and employees who fail to comply with anti-corruption measures, as well as violations of laws, regulations, company policies, or the ethical principles in the company's business operations. They will be investigated and subjected to disciplinary actions according to the company's established rules, which may include termination or removal from position. Legal actions will also be taken if the conduct violates applicable laws, regulations, or relevant requirements.

02

In cases where the whistleblowing or complaint is made dishonestly or is found to be malicious, intended to harm, or aimed at personal gain, the group company may consider taking action against the false complainant according to the company's procedures or applicable laws, as appropriate, depending on the case.



Remedial Measures

The group company has established remedial measures to ensure that stakeholders, including employees, communities, or surrounding societies, who suffer from violations of laws, regulations, company policies, ethical principles, or human rights violations as defined by the company, are effectively compensated and can restore the damage caused to an appropriate or improved condition. The remediation can be carried out as follows:

- **Monetary compensation**, such as paying compensation for the damage to the affected party. The amount to be paid or the circumstances under which payment will be made depend on negotiations between both parties and according to the company's regulations, ensuring transparency in the process.
- **Non-monetary compensation**, such as issuing an apology, providing assistance after a critical event (for example, in cases of sexual harassment or accidents within the workplace), to help restore the mental well-being of the affected person, as well as rehabilitation and other supportive measures.

In any case, the remedial actions must go through a consultation process for mediation and mutual agreement by both parties.





**Be a part of the movement to
end corruption and uphold strong
corporate governance.**

