



Gunkul Engineering Public Co., Ltd. and GUNKUL Group			
	Anti-Corruption and Whistleblowing Policy	Doc. No.	POL-BOD_68-015
		Effective date	27 FEB 2025
	Approved by the Resolution of the Board of Directors Meeting No. 1/2025 on 27 February 2025	Issue No.	12.0
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### Message from the Chairman of the Board of Directors

To ensure that the operation of the Company and the Group is in accordance with global standard practices, adheres to operating business with transparency and justice, and also adhere to social responsibility serving all stakeholders according to good corporate governance and business ethics, and in accordance with the Company's intention to against all forms of corruption by joining the "Thai Private Sector Collective Action Against Corruption (CAC)". Accordingly, the Board of Directors formulates the "Anti-Corruption and Whistleblowing Policy" to encourage all personnel of organization, stakeholders and related persons to acknowledge the intention and commitment of the Company and the Group, and to use as guideline for joint practice to achieve the said objective.

The Company requires all personnel in the organization to study and strictly adhere to this policy. The Company considers the "Anti-Corruption and Whistleblowing Policy" a part of the Company's "Code of Conduct."

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## 1. Introduction


Gunkul Engineering Public Co., Ltd., (“the Company”) including its subsidiaries and affiliated companies (“the Group”) operate business with adherence to morality, ethics, honesty, responsibility to society and all stakeholders in accordance with good corporate governance and business ethics of the Company, as well as, policy and practices towards stakeholders and prescribed missions, in order to affirm its intention and commitment regarding anti-corruption.

In order to enable decision-making and business operation that may cause the risk of corruption to be carefully and fairly considered, the Company formulates the “Anti-Corruption and Whistleblowing Policy” in writing to serve as an operational guideline for the organization with transparency, sustainably, and part of business operation.

## 2. Definitions and Forms of Corruption

### Definitions

“The Company”	Gunkul Engineering Public Co., Ltd.
“The Group”	Subsidiaries and affiliated companies of Gunkul Engineering Public Co., Ltd.
“Board of Directors”	Directors of Gunkul Engineering Public Co., Ltd. and the Group
“Executives”	Persons holding position from Assistant Vice President level and above of Gunkul Engineering Public Co., Ltd. and the Group
“Personnel”	Directors, executives, employees at all levels, and staff of Gunkul Engineering Public Co., Ltd. and the Group
“Related person”	Mediator and business representative, consultant, or person who perform work for the Company and the Group
“Stakeholder”	Shareholders, employees, customers, partners, rivals, public sector, society and community
“Fraud”	Seeking for unlawful benefit for oneself or others, such as false financial evidence, use of assets of the Company and the Group for personal benefits, peculation, embezzlement, defraud, act of conflict of interest.
“Corruption”	Power abuse for personal benefits, all forms of bribery, offer of contract or promise, demand or reception of money, asset and other benefits in improper manner from the government officers, public and private agencies. This shall include the business

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advantage for oneself or allies through the corrupted duty performance by acquiring or maintaining business or any other improper business benefits.

“Political Assistance”

Granting money, assets, privilege, or place to facilitate the political party, politician or politic-related person.

“Donation for Charity”

Donation of money, objects or anything with calculable financial value to the charity organization without any return.

“Financial Support”


The money, objects or return with calculable financial value paid to or received from customers, trade partners, business partners with objectives to promote the trademark of brand or the reputation of the Company and the Group, or to create commercial credibility and business relation.

“Facilitation Payment”

Small expenses paid informally to government officials unofficially and is sufficient to ensure that government officials will proceed according to the process or as an incentive to speed it up. Such process shall not require the discretion of government official and it is an act of duty of that government officials, and shall also be the right that the juristic person should have received under the law, such as applying for or renewing a license requesting a certificate or obtaining public services, etc.

“Government employee”

Government officials or local employees who have a permanent position or salary, employees or persons working in state enterprises or government agencies, political office-holder, local administrators and members of local councils who are not holding political positions, official under the law on Local Administration Act. This shall also include directors, sub-committee members, employees of government agencies, state enterprises, or government agencies, an individual or a group of persons who exercise authority or are authorized to exercise the administrative power of the state in order to take any action in accordance with the law whether it is established in the bureaucratic system, state enterprises, or other state enterprises.

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“Employment of government employee”	The Company hiring personnel from the public sector to work for the Company.
“Presents”	Anything of value that person/company give to another person/company without directly demanding compensation. Presents can be objects or in the form of other benefits.
“Entertainment”	Expenses for business entertainment, food and beverages, and to include organizing events/ recreational activities such as carnivals, sporting events and other spending that are directly related to business practices or is a commercial practice. However, it must be a reasonable spending and not affecting operational decisions or cause benefits of conflict.
“Welcoming”	Participating in social events, cultural events, or watching sports with the officers or persons who have or may have business relationships with the Company.

### **Forms of Corruption**


Any action which promotes, facilitates or supports individual, group of persons, or organization in return of business benefit which contradicts the business ethics.

### **3. Scope of Implementation**

This Anti-Corruption and Whistleblowing Policy (“Anti-Corruption policy”) applies to all personnel of the Company and its Group. It also encourages and promotes all relevant parties and stakeholders to adhere to the same practices as the Company.


### **4. Anti-Corruption and Whistleblowing Policy**

The Company and its Group has a policy to forbid the directors, executives, employees, and staff to commit any action in relation to all forms of corruption, whether direct or indirect, in the position of receiver, grantor, or one who offers the bribery to the related person or organization. The Company will regularly review the policy and practice guideline on an annual basis to ensure alignment with changes in business operations, regulations, legal requirements, and the directives of regulatory authorities.

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## 5. Duties and Responsibilities

- 5.1 **Board of Directors** is responsible for formulating the Anti-Corruption policy, supervising and promoting the anti-corruption process in the organization to cultivate the Company's personnel to understand and realize the significance of anti-corruption until it becomes organizational culture and value.
- 5.2 **Audit Committee** is responsible for supervising compliance according to anti-corruption measures by auditing the financial and accounting reports, the internal control system, the internal audit system, and the risk management system in relation to the anti-corruption measures. This also include collecting whistleblowing or complaints on corrupted action that personnel in the organization involved, investigating the facts as informed, and proposing to the Board of Directors for acknowledgment or solve, including reporting the results in the Audit Committee's report, which is part of the Annual Registration Statements (Form 56-1 One Report), on a yearly basis.
- 5.3 **Good Corporate Governance and Sustainability Development Committee** is responsible for setting up the framework and reviewing the Anti-Corruption policy, as well as responsible for encouraging all personnel to strictly adhere to the Anti-Corruption policy in compliance with the Good Corporate Governance policy.
- 5.4 **Risk Management Committee** is responsible for supervising and supporting the implementation of measures to prevent risks that may arise from corruption, as well as assessing risks from operations across all sectors of the organization, covering key risks, sustainability risks (ESG Risk), and emerging risks, to serve as the information in establishing or reviewing the policies and measures adequately and properly.
- 5.5 **Nomination and Remuneration Committee** is responsible for setting up the framework and determining process for a transparent and fair nomination and remuneration.
- 5.6 **Executive Committee and management** are responsible for establishing the system and measures to promote and support the Anti-Corruption policy in order to communicate with employees and involved persons, as well as, stakeholders for their compliance. Also responsible for assessing and reviewing the appropriateness of the system and measures to be in accordance with the changes of business, regulations, requirement and legal specification.
- 5.7 **Executive of the Internal Audit** is responsible for auditing and reviewing operations to ensure they are conducted correctly, in accordance with policies, guidelines, authority, regulations, laws and requirements of the regulatory authorities, to ensure that appropriate and sufficient control systems are in place to mitigate the risks of corruption. The results of the audit must be

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reported to the Audit Committee and the Board of Directors for acknowledgment on a quarterly basis.

5.8 **Employees and Staff** is responsible for complying with the regulations, laws and requirements of the supervising agency, as well as, to understand and realize the importance of anti-corruption.

5.9 **The Company has a policy to ensure that its subsidiaries, associated companies, and business representatives under its control** are informed of and comply with the Company's Anti-Corruption policy.

## 6. Practice Guidelines

6.1 The Company and the Group are committed to create an organizational culture that against corruption.


6.2 The personnel of the Company and the Group shall comply with the Anti-Corruption policy and business ethic by not engaging with corruption, either directly or indirectly, for benefits of themselves and involved persons. In this regard, directors and executives shall act as a role model and supervise all employees to comply with the anti-corruption measures.

6.3 The Company and the Group shall set up internal control system with consideration on corruption risk control. Including, assessing the risk, and adequately and properly establish the risk management measures.

6.4 The Company and the Group shall set up the process to audit the sales and marketing, including procurement work, to be transparent and in compliance with regulations and procedures of the Company. In addition, they shall assess the risk of corruption and manage the proper solution.

6.5 The Company and the Group shall set up the process to preserve documents and records for auditing to verify accuracy and appropriateness of the financial reports. Also, setting up the operational procedure to ensure that all transactions are recorded and can be explained, arrange the internal control system, and inspect the accounting and data preservation to ensure that the record of financial transactions is based on evidences adequately for verification. This shall affirm the efficiency of the anti-corruption measures.

6.6 The Company and the Group shall have the measures to encourage employees at all level not to disregard or ignore the possible act of corruption. In this case, they shall immediately notify the supervisor thereof or report such action via the channels specified in this policy. In this regard, the Company has the measures to protect the employee who report on corruption related to the Company complainant employee, and has the measure to protect the

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complainant or the employee cooperating with the corruption report process as stipulated in the “Whistleblowing or Complaint relating to Corruption Channels” and “Measures to Protect Confidentiality”.

- 6.7 The Company and the Group who commits the act of corruption shall be subject to penalty according to regulations prescribed by the Company and the Group.
- 6.8 The senior executives shall regularly report the investigation result according to the anti-corruption measures to the Audit Committee and the Board of Directors.
- 6.9 The Company and the Group shall organize training courses to promote awareness and understanding regarding the Anti-Corruption policy among personnel and related persons at least once a year. A training for new personnel shall be part of the Company’s orientation. Moreover, it shall require related persons to submit the acknowledgement form regarding the Anti-Corruption policy to the Company and the Group.
- 6.10 The Company and the Group shall promote the outsiders and stakeholders to acknowledge the Anti-Corruption policy and participate in suppression of corruption via the Company’s communication channels as to realize that the Company and the Group have a strict intention to against corruption.

## 7. Requirements for Operation

- 7.1 In order to prevent risk from corruption that may occur to the Company and the Group, the directors, executives, and employees of the Company and the Group, shall adhere to the Anti-Corruption and Whistleblowing Policy. Giving and receiving any other benefits to the Company's stakeholders shall be considered in accordance with the regulations as follows:
- Giving and receiving is for a reasonable purpose in accordance with ethical standards.
  - Giving and receiving are not intended to seek profit or to influence business decisions.
  - Giving and receiving must not be illegal.
  - Giving and accepting must not conflict with the Group policies and regulations.
  - Giving or accepting must not conflict with the policy of business partners, public sectors or stakeholders.
- 7.2 Any operation in accordance with the Anti-Corruption policy shall follow the guideline stipulated in this policy, as well as the good corporate governance manual, business ethics manual, relevant policies, principles, regulations, requirements, specification, guidelines, operation manual, and any guideline that the Company and the Group may establish in the future.



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7.3 This policy shall apply to all activities in relation to operations of the Company and the Group.

7.4 This policy shall apply to the human resource management process covering personnel recruitment or selection, promotion, training, performance assessment, and award granting. The supervisors of all levels shall communicate and create a good understanding with employees so as to effectively apply this policy to business activities under his/ her responsibility and supervision.


7.5 There shall be the annual risk assessment for relevant activities or activities prone to occurrence of corruption in the organization, and use it to prepare an operation manual for involved persons.

7.6 For clarification in operating matters that have a high risk of corruption, personnel of the Company and the Group shall carefully carry out the following issues:

7.6.1 Reception or granting present, asset, or any other benefit, including entertainment, welcoming service charge and other expenses shall be in accordance with the prevailing norm. Their value shall not beyond the proper level to the extent that it affects the duty performance.

- Reception or granting present, asset, or any other benefit, including welcoming service charge and other expenses shall follow the approval process of the Company and the Group.
- Reception of present, asset, or other benefit in accordance with the prevailing norm with value of more than 5,000 Baht shall be reported to the head of department by submitting the “Report of reception of present, asset or other benefit of personnel” (Attachment 1). In this regard, the personnel shall deliver the present, asset, or benefit to the Human Resources Department for further use in any activity as deemed appropriate.
- Reception that are reasonable, transparent, and relevant to business can be done by not unreasonably extravagant and must not affect the decision-making in performing duties of the employees, business representatives, and person related to the Company. The employees must avoid entertainment or the exchange of gifts with high value or excessive frequency unless it is a reception for business purposes and to maintain normal business relationships.

7.6.2 Granting or receiving charitable donations or financial support shall be transparent and lawful under the inspection, approval and review process, with evidence documents to comply with the Company’ approval process.

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7.6.3 Employment of government employees to hold a position as a director, executive, employee, or consultant of the Company must have a process of selection, employment approval, and compensation to ensure that such employment is according to a clear operational measure. The operational guidelines are set as follows:

- For the employment of government employees to hold a position as a director, executive, employee, or consultant of the Company, the process of selection, employment approval, and compensation must be considered by the Nomination and Remuneration Committee regarding the appropriateness of employment, and propose to the Executive Committee and/or the Board of Directors to consider and approve as appropriate.
- The information regarding employment of government employee must be disclosed in the Annual Registration Statements (Form 56-1 One Report) for transparency.


7.6.4 Facilitation payments that may lead to corruption is forbidden to do. The Company does not have a policy to pay for facilitation in any form, both directly and indirectly, by not taking any action nor accept any action in exchange for facilitating business operations.

7.6.5 Must not directly or indirectly give or accept bribes to officials or agencies or representatives or those involved in both public and private sectors to facilitate business operations.

7.6.6 The Company has a policy to conduct business with impartiality, not aligning with any political party or politician belonging to any political party. The Company has no policy to provide financial or material support to any political party, politician or candidate for political assistance.

7.7 If the personnel do not comply with the anti-corruption measures and violate or refuse to comply with this policy, either directly or indirectly, the Company and the Group shall impose the disciplinary penalty according to the prescribed regulations. Besides, the Company and the Group may pursue the legal action if such violation is unlawful.

7.8 Statistics regarding whistleblowing and complaints that the Company received together with the update on progress of whistleblowing/complaints management, including improvement process to prevent recurrence are required to be disclosed in the Annual Registration Statements (Form 56-1 One Report).

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## 8. Whistleblowing or Complaint relating to Corruption

- 8.1 When the personnel find the act, either direct or indirect, of corruption in relation to the Company and the Group, such as seeing a person accepting bribes or receiving bribes from government officials or private agency.
- 8.2 When the personnel find the wrong-doing that violate regulations of the Company and the Group, and affects the Company's internal control system to the extent that it can be assumed that such actions could be a channel of corruption.
- 8.3 When the personal finds any action that cause the Company and the Group to lose benefits and affect the reputation.
- 8.4 When the personal finds any action that contradicts the laws, morality or business ethics.

## 9. Whistleblowing or Complaint relating to Corruption Channels

The Board of Directors has assigned the Audit Committee to receive the reports of whistleblowing or complaints of actions that may cause suspicion of corruption to the Company, either directly or indirectly, for the Audit Committee to independently and fairly consider the reports on complaints through the specified channels.

The complainant shall identify the details of complaint (such as name or title of the wrong-doer, the time that the wrong action was found), together with name, address and mobile number of the complainant, and submit to one of the following channels:


- 1) Submit via the Audit Committee's e-mail: [audit\\_committee@gunkul.com](mailto:audit_committee@gunkul.com)
- 2) Submit via the Company's website: [www.gunkul.com](http://www.gunkul.com), at "Whistleblowing channel"
- 3) Submit via sealed postage to:
 

Chairman of the Audit Committee  
 Gunkul Engineering Public Company Limited  
 548 One City Centre (OCC), 44th Floor, Phloen Chit Road  
 Lumpini, Pathum Wan, Bangkok 10330
- 4) Submit via "Whistleblowing and Complaints Box"
 

(Set in the Company and can be opened by the Secretary to the Audit Committee)

## 10. Measures to Protect Confidentiality

In order to protect the rights of complainants or informants acting in good faith, the Company shall conceal names, addresses or any information that can identify complainants or informants,

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and keep information of the complainant and informant confidential. Only those who are responsible for investigating complaints will have access to such information.

In this regard, the person receiving information from performing duties related to complaints have a duty to keep information, complaints and evidence documents of complainants and informants confidential. Such person must not disclose information to other people who do not have relevant responsibilities unless it is a disclosure according to the duty required by law.

In case of whistleblowing or complaint, the Company shall be in charge of protecting the complainant, witness, and informant who provide information for the investigation process not to be affected by any trouble or injustice arising from whistleblowing, complaining, and witnessing or providing information.


If the complainant or informant or those who reject corruption is the personnel of the Company or the Group, the Company shall be fair in providing protection to prevent negative impact on that person, such as demotion, penalty, etc., although such actions would cause the Company to lose business opportunity.

## 11. Process on Complaint Reception, Investigation, and Penalty

The Company and the Group set up the process following the reception of the whistleblowing or complaint by identifying group of involved persons, complaint reception process, investigation and penalty as follows:

### 11.1 Group of involved persons

- |                            |   |
|----------------------------|---|
| 1) Complainant             | Person who is whistleblower or complainant  |
| 2) Complaint Receiver      | Persons who receive the complaint via channels as specified in 9., which include Chairman of the Audit Committee, the Audit Committee, and Secretary to the Audit Committee |
| 3) Coordinator             | Person who preserves the information regarding the complaint and operational results, which is the Secretary to the Audit Committee   |
| 4) Investigation Committee | Chief Executive Officer sets up the Investigation Committee to investigate the fact   |
| 5) Audit Committee         | Audit Committee of Gunkul Engineering Public Co., Ltd.  |

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- |                                       |   |
|---------------------------------------|---|
| 6) Chairman of the Board of Directors | Chairman of the Board of Directors of Gunkul Engineering Public Co., Ltd. |
| 7) Chief Executive Officer            | Chief Executive Officer of Gunkul Engineering Public Co., Ltd.            |
| 8) Human Resource Department          | Discipline controller   |
| 9) Secretary to the Audit Committee   | Secretary to the Audit Committee of Gunkul Engineering Public Co., Ltd.   |
| 10) Company Secretary                 | Company Secretary of Gunkul Engineering Public Co., Ltd.                  |

#### 11.2 Registration and Submission of Complaint


- 1) The complaint receiver submits the complaints to the coordinator within 3 working days from the date of receipt of the complaint from the complainant.
- 2) The coordinator submits the complaint to the Investigation Committee for further consideration or investigation.

#### 11.3 Investigation

- 1) If the Investigation Committee deems that the complaint:
  - is not significant, the Committee shall submit the matter to the employee's supervisor for further consideration according to the Company's disciplinary rules.
  - is not based on fact or does not contradict the Company's benefits, the Committee shall record in the complaint registration and end the investigation.
- 2) If the Investigation Committee deems that the complaint has possibility of corruption or involved in a conflict of interest with the Company:
  - the Investigation Committee shall be responsible for investigation and inform the investigation report to the Audit Committee and the Chief Executive Officer for consideration and further proceeding according to the Company's disciplinary rules and/or legal penalty.
- 3) If the complaint is related to the corruption of the senior executives of the Company:
  - the Investigation Committee shall be responsible for the investigation and inform the investigation report directly to the Audit Committee for the further consideration and proceeding.

#### 11.4 Order and Penalty

- 1) If the accused person is really guilty, the Company shall order the penalty according to the Company's disciplinary rules and/or proceed with legal action.

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- 2) If, upon investigation, the reported matter is a dishonest complaint and the complainant is the Company's personnel, the Company shall take disciplinary action according to the Company's regulations.

In addition, the investigation must be finalized within 30 days after received complaint from the coordinator. (If the investigation cannot be finalized within 30 days, the reason of delay shall be notified to the coordinator.)


#### 11.5 Notification of the Investigation Result to the Complainant

- 1) The Investigation Committee shall submit the operational results of complaints received to the coordinator.
- 2) The coordinator records the operational results in the registration of complaints and notifies the operational results of complaints received to the complainant.
- 3) The coordinator reports the operational result of complaints received and the follow-up (if any) to the Investigation Committee, the Audit Committee, the Good Corporate Governance and Sustainability Development Committee, and the Board of Directors for acknowledgement. Such report shall be proposed quarterly.

## 12. Anti-Corruption Policy Disclosure

To ensure that all personnel in the organization is informed about the Anti-Corruption policy, the Company shall implement the following measures:


- 1) Disclose the Anti-Corruption policy and other relevant policies through various channels by focusing on personnel of the organization, related persons, and stakeholders to be able to access the policy effectively and efficiency.
- 2) Organize the training regarding the Anti-Corruption policy for personnel of organization and related persons continuously once a year.
- 3) Encourage employees to join projects or activities held by public or private sector to demonstrate the Company and the Group's commitment to operate in accordance with Anti-Corruption policy
- 4) The Company shall regularly review the Anti-Corruption policy at least once a year.

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### Revision record

Document No.	Issue No. /Revision No.	Date	Revised part	Reason of revision	Date of Cancellation
OMD 2559/13	1.0	29 DEC 2016	Rewritten	To comply with the principles of the supervising agency and the current operations	25 DEC 2017
OMD 2560/13	2.0	25 DEC 2017	Reviewed	To comply with the principles of the supervising agency and the current operations	19 NOV 2018
OMD 2561/07	3.0	19 NOV 2018	Reviewed	To comply with the principles of the supervising agency and the current operations	8 NOV 2019
OMD 2562/18	4.0	8 NOV 2019	Reviewed	To comply with the principles of the supervising agency and the current operations	2 MAR 2020
OMD 2563/06	5.0	2 MAR 2020	Reviewed	To comply with the principles of the supervising agency and the current operations	1 MAR 2021
POL-BOD 64-011	6.0	1 MAR 2021	Reviewed	To comply with the principles of the supervising agency and the current operations	12 NOV 2021
POL-BOD 64-034	7.0	12 NOV 2021	Reviewed	To comply with the principles of the supervising agency and the current operations	8 FEB 2022
POL-BOD 65-002	8.0	8 FEB 2022	Reviewed	To comply with the principles of the supervising agency and the current operations	10 NOV 2022
POL-BOD 65-010	9.0	10 NOV 2022	Reviewed	To comply with the principles of the supervising agency and the current operations	27 FEB 2023
POL-BOD 66-003	10.0	27 FEB 2023	Reviewed	To comply with the principles of the supervising agency and the current operations	28 FEB 2024
POL-BOD 67-027	11.0	28 FEB 2024	Reviewed	To comply with the principles of the supervising agency and the current operations	27 FEB 2025
POL-BOD 68-015	12.0	27 FEB 2025	Reviewed	To comply with the principles of the supervising agency and the current operations	-



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### Appendix 1

#### Report of reception of present, asset or other benefit of personnel

I, ..... from the Department of ..... would like to report the reception of present, asset, or other benefit in compliance with “Anti-Corruption and Whistleblowing Policy”, detailed as follows:

Details of the reception	1.	approximate value of	Baht.
	2.	approximate value of	Baht.
	3.	approximate value of	Baht.
	4.	approximate value of	Baht.
	5.	approximate value of	Baht.
Reception date			
Received from			
Relationship with the business			
Reason of reception			
Signature of the receiving personnel	Signature of the Department Director	Signature of the Human Resource Department Director	
Position:	Position:	Position:	
Date:	Date:	Date:	

#### For the Human Resource Department only


The Human Resource Department has received the present as reported above and pursued the following action:

- ☐ Use as an intensive for the employee  
Name-Surname of the employee ..... On (date) .....
- ☐ Donate for charity  
Name of the entity receiving the donation ..... On (date) .....
- ☐ Other. Please specify  
.....

Signature of the personnel conducting the action ..... Position ..... Date .....

Remark: The Report of reception of present, assets, or other benefit of personnel shall be kept at the Human Resource Department.



Gunkul Engineering Public Co., Ltd. and GUNKUL Group			
	Anti-Corruption and Whistleblowing Policy	Doc. No.	POL-BOD_68-015
		Effective date	27 FEB 2025
	Approved by the Resolution of the Board of Directors Meeting No. 1/2025 on 27 February 2025	Issue No.	12.0
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I have acknowledged and will cooperate according to measures in the Anti-Corruption and Whistleblowing Policy of Gunkul Engineering Public Co., Ltd. and the Group

Name-surname	Position/Department	Signature	Date
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