


Gunkul Engineering Public Co., Ltd. and GUNKUL Group			
	Important Document Retention and Destruction Policy	Doc. No.	POL-BOD_67-017
		Effective Date	28 FEB 2024
	Approved by the Resolution of the Board of Directors Meeting No. 1/2024 dated 28 February 2024	Issue No.	1.0
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Gunkul Engineering Public Company Limited (“the Company”) including subsidiaries and affiliated companies have established this policy to determine how to retain and destroy important documents that are created or received and retained by the Company as a guideline for all employees to be aware of and to follow the guideline according to good practices in retaining and destroying important documents.

In addition, this policy is not intended to change contractual terms or any laws and regulations which the Company is obliged to retain, return, or destroy such documents.

Objectives

1. To be a guideline for retaining and destroying important documents of the Company to be appropriate and consistent with relevant laws and regulations.
2. To give importance to the rights of personal data owners and the protection of personal data in cases where important documents relate to personal data.


Related parties

1. All employees of the Company are responsible for complying with this policy.
2. Department heads and supervisors of all department are responsible for supervising operations in their departments to be appropriate and consistent with this policy.
3. The Information Technology Department is responsible for retaining and destroying important documents on the Company's central electronic systems in accordance with this policy.
4. The Internal Audit Department is responsible for auditing the operations of those involved in the retention and destruction of important documents according to this policy.

Definitions

Any phrases or words used in this policy are to have the following meanings

“The Company”	Gunkul Engineering Public Co., Ltd. and the group
“The Group”	Subsidiaries and affiliated companies of Gunkul Engineering Public Co., Ltd.
“Important Documents”	Documents containing important information created or received and retained by the Company related to business operations, business transactions, and making legal contracts. This may be in the form of paper or electronic documents, such as handwritten documents, blueprints, photographs, videos, audio files, electronic or digital records, emails, websites, digital files and images,

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computer programs, advertising media, contracts and memorandums, licenses, invoices, purchase orders, names and contact information within and outside the Company, presentations, analyzes and reports made by or on behalf of the Company and the Group including any documents related to personal data.

“e-Document system”	Internal information technology system of the Company used for approving transactions and retaining important documents electronically.
“Strong room”	Area for retaining important documents of the Company. It is a room that is overseen and responsible by the Registration department to retain important documents in paper form and prevent unauthorized persons from accessing.
“Electronic strong room”	Area for retaining important documents of the Company on e-Document system. It is overseen and responsible by the Information Technology Department to retain important documents in electronic form and prevent unauthorized persons from accessing.

Operational criteria


Related departments or employees must comply with the conditions as follows:

1. Retention of important documents

In retaining important documents of the Company that are original documents, when creating or receiving important documents, the department created or received must deliver the original documents to the Registration department for the Registration department to continue retaining in the Strong room and deliver scanned files of important documents or important documents in electronic form and accompany documents to the Registration department through the Electronic strong room system via the e-Document system.

Important documents in electronic form must clearly display images and text, easy to read and complete. Scanned documents must also be easily accessible for later reference.

To prevent unrelated persons from accessing important documents as well as editing/altering them, the Company has Strong room and Electronic strong room services for departments that create or receive important documents of the Company in requesting registration numbers to control and retain important documents into the document storage/Strong room, both original and/or scanned versions. The requester has to submit the request through the e-Document system, where the requester must fill in basic information of the said important document, upload a set of scanned documents and fill out the Personal Data Protection Form (PDPA) (if any) as well.

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All important documents are considered property of the Company, related departments must therefore retain and destroy them according to the guideline set forth in this policy. The Company specifies the minimum period for retaining important documents as specified or they may be retained for a longer period of time if they are necessary for legal requirements or the Company's business according to existing laws. When considering an obligation that is expected to expire, the responsible department must review it together with the Company's legal department. The types of important documents are divided as follow:

(1) Important registration documents related to the Ministry of Commerce, the Revenue Department, and government agencies

Related departments must retain important documents of this type for a period of at least 10 years after the business has been dissolved and liquidation has been completed or the obligation ends.

(2) Important documents related to the contract, Memorandum of understanding, and license

Related departments must retain important documents of this type for a period of at least 10 years after the obligation ends.

(3) Important financial and accounting, procurement, and construction management documents


Related department must retain important documents of this type for a period not less than that required by accounting standards or 10 years after the obligation ends.

(4) Important documents in electronic form in operating systems

The Information Technology Department is responsible for supervising the retention system of important documents in electronic form in the internal operating systems of the Company, such as Microsoft Dynamic AX (ERP) system, e-Document system, iCloud system, etc. in order to manage the retention and destruction of important documents in electronic form in operating systems for maximum efficiency and consistent with the principles of this policy including relevant laws and regulations. In addition, important documents in electronic form in operating systems must be retained until 10 years after the Company's obligations have expired or until the Chief Executive Officer (CEO) orders or approves otherwise.

(5) Temporary important documents

Temporary important documents are documents that are for short-term use and do not fall into any of the categories of important documents specified above, such as references, notes, emails, messages, job application information of job applicants and etc. The relevant departments must retain temporary important documents as necessary for the Company's operations or business operations. Executives in each line can consider the retention period of

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these important documents according to the necessity and appropriateness of each line's operations.

2. Destruction of important documents

For important documents retained by the Company beyond the period specified in item 1. and is no longer necessary for the operations or business operations of the Company, the related departments must request approval from executives in their own line and destroy them using the following methods:

2.1 Destruction of important documents in paper or printed media


Employees cross out important documents that are to be destroyed that are under their responsibility as a sign of discontinuance by not reusing them for recycling purposes and destroy them using the Company's document shredder or use the service of destroying important documents by outside contractor (but it must be a central operation by the Human Resources and Administration Department), which a shredding cycle for important documents must be organized at least once a year, depending on the quantity and storage space of the Company's important documents.

Departments that destroy important documents must prepare the record for destruction of important documents of their own department. This must specify details about the important documents that will be destroyed, the date of destruction, the method of destruction, and the inspector of destruction (according to the form for recording the destruction of important documents as shown in Attachment 1) for use as evidence for audit.

2.2 Destruction of important documents in electronic form

If there is a destruction of important documents in electronic form or those retained in storage devices, the departments that destroy important documents must prepare the record for destruction of important documents in electronic form or those retained in the department's own storage devices. This must specify details about the important documents that will be destroyed, the date of destruction, and the method of destruction for use as evidence for audit.

However, important documents in electronic form or those retained in storage devices that are deleted or destroyed may still have electronic copies and may not actually be completely deleted or destroyed even after the process has been performed. In the case of permanently deleting or destroying important documents that are in electronic form or retained in storage

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devices so that they can no longer be accessed or used, they must be deleted or destroyed by means of data destruction by degaussing, overwriting or shredding and etc.

In the case where the services of outside contractor are used to destroy important documents of the Company, the department responsible for hiring such contractor must establish a personal data processing agreement between the Company and contractor. The agreement must be reviewed by the Legal Department and the selection of contractor for destroying important documents must be carefully considered to prevent data leakage events that may occur from the contractor's operations as well. The contractor must provide confirmation and allow the Company to verify that the Company's important documents are all truly destroyed.

3. Verifying compliance with this policy

The Internal Audit Department is designated to audit the operations of those involved in compliance with this policy.

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Revision Record

Document No.	Issue No. / Revision No.	Date	Revised Part	Reason of revision	Date of Cancellation
POL-BOD 67-017	1.0	28 FEB 2024	Newly written	To be in consistent with good practices in retaining and destroying important documents.	-

