



บริษัท เอไอ เอนเนอร์จี้ จำกัด (มหาชน)

AI Energy Public Company Limited

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**Complaints and Reporting of  
Wrongdoings and Misconduct Policy**

*- English Translate Version -*



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## **Complaints and Reporting of Wrongdoings and Misconduct Policy**

AI Energy Public Company Limited (“The Company”) recognizes the importance of conducting business transparently, adhering to principles of good corporate governance to ensure efficient and fair business operations, social responsibility, and prevention of corruption and corporate malpractice. The Company, therefore, establishes a code of conduct that does not support the activities of groups or individuals acting in ways inconsistent with seeking benefits in order to earn the trust of conducting business without corruption. The Company has formulated this policy for whistleblowing and reporting to serve as a guideline for the board, managements, and employees to strictly adhere to and to instill confidence that reporting or complaining will not lead to repercussions. Mechanisms have been established to protect complainants or information providers, with details outlined in this policy.

### **1. Objectives**

The purpose of the "Complaints and Reporting of Wrongdoings and Misconduct Policy" is to support the board, managements, consultants, and employees of the Company, as well as its subsidiaries, and stakeholders in reporting and disclosing corruption-related misconduct safely and effectively. This policy aims to prevent corruption within the Company and its subsidiaries, promote the positive image and ethical values of the Company.

### **2. Scope**

This policy is applicable to the Company's board, independent directors, managements, and all employees within the Company and its subsidiaries. It also covers agents, intermediaries, independent contractors, consultants, individuals acting on behalf of the Company (referred to as "business associates"), vendors, creditors, customers, business partners, shareholders, and stakeholders who have business relationships with the Company and its subsidiaries.

### **3. Complaints and Reporting of Wrongdoings and Misconduct Policy**



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- 3.1 Employees of the Company are prohibited from ignoring or neglecting, in cases where they observe actions that fall within the scope of corruption or misconduct related to the Company. Employees must report such actions to their superiors or individuals responsible and cooperate in the process of fact-checking and investigation.
- 3.2 Employees of the Company must collaborate to create values and cultivate a working environment characterized by honesty, integrity, transparency, and freedom from corporate corruption, making it the culture of the organization.
- 3.3 Employees of the Company must conduct investigations and audits transparently, accurately, and fairly, under the regulations, policies, and guidelines of the Company, especially in marketing and sales processes, procurement, and accounting and finance.
- 3.4 The Company will provide fairness and protection to employees, and no employee will be penalized or demoted for refusing to engage in corporate corruption, even if such refusal results in business opportunities loss for the Company.

#### 4. Roles and Responsibilities

- 4.1 **Board of Directors** is responsible for establishing the policy on complaints and reporting of wrongdoings and misconduct. They should actively promote the policy's implementation within the Company, undergo training on anti-corruption practices to ensure understanding of the policy, procedures, and preventive measures. This is crucial for fostering a culture of honest and ethical work practices among all employees in the Company, promoting awareness of the importance of anti-corruption efforts, and adherence to established practices.
  - 4.1.1 Oversee the establishment of a personal data governance structure and internal controls within the Company to ensure compliance with laws and personal data protection policies.
  - 4.1.2 Supervise and support the Company's efforts to effectively protect personal data and ensure compliance with laws.
- 4.2 **Audit Committee**
  - 4.2.1 Review the policy on complaints and reporting of wrongdoings and misconduct approved for suitability within the organization.
  - 4.2.2 Take responsibility for notifying and establishing an investigation committee when there is a complaint, ensuring transparent and confidential internal investigations.



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4.2.3 Be responsible for considering and proposing actions if corruption is found within the organization to the board of directors, collectively determining penalties, and suggesting preventative measures.

4.2.4 Monitor and evaluate the effectiveness of anti-corruption measures to ensure appropriate and sufficient control systems are in place to mitigate corruption risks.

4.3 **Internal Auditors** are responsible for reporting progress and outcomes of complaints, allegations of wrongdoing, and misconduct investigations. They maintain a record of received complaints and incidents and provide regular summaries to the audit committee, at least quarterly (if applicable), to instill confidence in the internal control system, reporting mechanisms, and complaint and allegation reduction efforts within the organization.

4.4 **Directors, Executives, and Managements** are obligated to lead by example, oversee, and encourage subordinates to adhere to ethics, regulations, measures, rules, and various policies of the Company. They ensure effective communication and training on the mentioned policies and guidelines to all staff, creating confidence that Company personnel have sufficient knowledge and understanding to implement relevant policies and guidelines efficiently and effectively. They also review the appropriateness of various practices to align with changes in business, regulations, and legal requirements, creating a suitable environment for confidence in the whistleblowing and complaint processes.

4.5 **Employees** are responsible for aligning their work with this policy and following relevant guidelines. If suspicions or violations of the policy arise, they must report to superiors or through designated reporting channels.

4.6 **Human Resources department** is responsible for advising management and employees on the implementation of this policy, including communication and necessary training.

## 5. Guidelines for Practicing on the Complaints and Reporting of Wrongdoings and Misconduct

Directors, managers, and employees at all levels of the Company and its subsidiaries must strictly adhere to the policy on complaints and reporting of wrongdoings and misconduct.



- 5.1 Employees must not overlook or ignore acts that fall within the scope of corruption and misconduct related to the Company. They are required to report such actions to superiors or designated individuals through specified channels and cooperate in the fact-checking process.
- 5.2 Individuals engaging in corruption or misconduct and those with knowledge or involvement in such activities will face disciplinary action according to the Company's regulations and legal penalties.
- 5.3 The Company will ensure fairness and implement protective measures for complainants or individuals providing information regarding corruption.
- 5.4 The Company emphasizes the dissemination, communication, and regular training to impart knowledge about the policy on complaints and reporting of wrongdoings and misconduct to employees consistently.
- 5.5 The internal audit is responsible for examining and verifying compliance with this policy and related practices, conducting audits, and reviewing the facts while tracking the investigation outcomes. They prepare reports for presentation to the audit committee.

## 6. Reporting of Misconduct or Complaints about Wrongdoings

- 6.1 **Matters reported as misconduct or complaints** can involve actions that violate Company regulations, policies, or laws, leading to damage to the Company's assets and reputation. The information and evidence must be sufficiently comprehensive for investigative purposes, including complete details such as names of involved parties, date and time of occurrence, event specifics, etc. The details of the misconduct that employees are required to report include:
  - 6.1.1 Acts or behaviors seeking undeserved benefits, including but not limited to embezzlement, corruption, paying bribes, hiring state officials with controllable powers, and collusion.
  - 6.1.2 Actions that violate Company regulations, business ethics, or have an impact on the Company's internal control system, raising suspicions of potential misconduct.
  - 6.1.3 Actions causing losses or harm to the Company's interests and reputation.
  - 6.1.4 Actions resulting in conflicts of interest.
  - 6.1.5 Actions violating laws, ethics, and business morality.
  - 6.1.6 Deceptive practices, fraudulent financial reporting, intentionally misleading others through false messages, or covering up the truth that should be disclosed.



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- 6.1.7 Operations that raise suspicions related to money laundering, accounting, finances, procurement, or any improper conduct leading to damage to the Company.

## 7. Channels for Submitting Complaints

### 7.1 Internal Feedback (Internal Complainants):

- 7.1.1 Comment Box
- 7.1.2 Head of the department to which the concerned employee belongs
- 7.1.3 Internal Welfare Committee or supervisor of human resources and corporate support
- 7.1.4 Comments or complaints can be submitted via email:
- 7.1.4.1 "Executive Committee" at [aienergy@aienergy.co.th](mailto:aienergy@aienergy.co.th)
- 7.1.4.2 "Audit Committee" at [ac@aienergy.co.th](mailto:ac@aienergy.co.th)
- 7.1.4.3 "Human Resources Department" at [hr@aienergy.co.th](mailto:hr@aienergy.co.th)

### 7.2 External Feedback (External Complainants):

- 7.2.1 Company Website: <http://www.aienergy.co.th>
- 7.2.2 Comments or complaints can be submitted via email:
- 7.2.2.1 "Executives Committee" at [aienergy@aienergy.co.th](mailto:aienergy@aienergy.co.th)
- 7.2.2.2 "Audit Committee" at [ac@aienergy.co.th](mailto:ac@aienergy.co.th)
- 7.2.3 By mail:
- 55/2 Moo 8, Setakit 1 Road.,  
Klong Maduea Subdistrict, Krathum Baen District,  
Samut Sakhon Province, 74110

## 8. Protection of Complainants, Whistleblowers, and Confidentiality

### 8.1 Protection of Complainants, Whistleblowers, and Related Parties:

Due to the honest and sincere nature of complaints and information provided, which ultimately benefit both the Company and its employees, those who submit complaints, provide information, state facts, or testify regarding complaints, and those who evaluate complaints will be protected. Even if their actions lead to genuine difficulties, they will be assured protection against termination, suspension, penalties, or any adverse actions.



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The Company has a policy to treat individuals equally and fairly, as per the Company's regulations. Protection will be extended to complainants, and the information related to the complaint will be kept confidential. In cases where an employee discloses information without good faith, such as disclosing private complaints or intentionally providing false information or evidence related to a complaint, and where such actions lead to internal divisions within the Company and its subsidiaries or provide false information with the intention of defaming an accused employee, such actions will be considered disciplinary offenses. Investigations will be conducted, and if found guilty, disciplinary action will be taken according to the Company's regulations.

## 8.2 Confidentiality and Name Redaction:

Employees or external complainants may choose not to disclose their names when reporting the misconduct of other employees. However, the Company encourages employees to identify themselves when making a report for easier contact and investigation.

Upon receiving a report from an employee or external complainant, the receiving unit takes appropriate measures to protect and prevent any form of retaliation against the reporting individual.

If any directors, managements, employees, or related parties believes they are being threatened, intimidated, or coerced, they can report findings of corruption, whistleblowing, or complaints to the Company's committee through the complaint channels.

## 9. Investigation and Disciplinary Actions

- 9.1 Upon receiving a complaint, the Executives Committee and Audit Committee will act as filters and investigate the truth of the matter.
- 9.2 During the investigation, the Executives Committee and Audit Committee may assign a representative (management) to provide periodic progress updates to the complainant or whistleblower.
- 9.3 If, after the investigation, it is found that the accused party has committed corruption or true misconduct, the accused will be given the opportunity to be informed of the allegations and to prove their innocence by providing additional information or evidence that demonstrates their lack of involvement.
- 9.4 If the accused party is found guilty of corruption, disciplinary action will be considered according to the Company's regulations. If the misconduct is also a legal offense, the offender may face legal



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penalties. Disciplinary action will be taken based on the Company's regulations, and the decision of the committee (management) will be final.

- 9.5 In cases where the wrongdoer is directors or managements of the Company and/or an employee who commits corruption with damages amounting to 500,000 Baht or more, the preliminary investigation committee will report to the Audit Committee promptly to appoint a representative as one of the investigating committee members. The results of the investigation will then be reported to the board of directors for disciplinary action, following the Company's practices.
- 9.6 The Company will notify the progress and results of the complaint or misconduct to the complainant if their identity has been disclosed and they can be contacted. However, if the complainant wishes to remain anonymous, the Company will not be able to provide notification of the results.
- 9.7 The investigation results will be submitted to the internal auditor to maintain a registry of complaints, whistleblowing, and misconduct, summarizing all reported instances for the Company and its subsidiaries quarterly. The reports will be presented to the Audit Committee and the Company's board of directors for consideration.

The Company recognizes the importance of having a policy for receiving complaints and reporting misconduct and corruption to reduce the risk of damage to the Company's assets and reputation. It also aims to instill confidence in business partners, customers, and shareholders by being perceived as a well-governed Company. The Company is confident that this policy will contribute to the development and growth of the Company.

Complaints and Reporting of Wrongdoings and Misconduct Policy was consented by the Audit Committees and approved by the Board of Director Meeting No.3/2021 on 13 August 2021 and effective onwards.

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Miss Pimwan Thareratanavibool

Managing Director

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