



-Translated Version-

Anti-Fraud and Corruption Policy

Ubon Bio Ethanol Public Company Limited and Its Subsidiaries

Introduction

Ubon Bio Ethanol Public Company Limited and its affiliated companies are committed to conducting business with integrity and ethics, while placing importance on social responsibility and accountability toward all stakeholders under the framework of good corporate governance principles. The Company adheres to good governance practices and conducts its business with transparency, supported by internal control and audit mechanisms designed to minimize opportunities for fraud and corruption within the organization. This reflects the Company's intention and commitment to combating fraud and corruption in all forms.

To ensure that the Company has appropriate policies, responsibilities, operational guidelines, and procedures in place to prevent fraud and corruption that may arise in connection with the Company's business operations, and to ensure that business decisions and operations involving potential fraud and corruption risks are carefully considered and properly conducted, the Company has established the Anti-Corruption Guidelines in writing. Such guidelines have been communicated and explained thoroughly to the Board of Directors, the Executive Committee, management, and employees at all levels in order to provide clear guidance for business operations and to support the Company's sustainable development.

As a representative of the Company's employees, I hereby declare the intention for all members of the Executive Committee, management, and employees to study, understand, and strictly comply with the Anti-Corruption Guidelines. The Company considers these Anti-Corruption Guidelines to form an integral part of the Company's "Rules and Regulations Relating to Work."

1. Objectives

- 1.1 To ensure that the Company has established appropriate responsibilities, guidelines, and procedures to prevent corruption in all business activities.
- 1.2 To demonstrate the clear commitment and intention of the directors, executives, and employees at all levels of Ubon Bio Ethanol Public Company Limited and its affiliated companies in combating all forms of corruption.



บริษัท อุบล ไบโธ เอทานอล จำกัด (มหาชน)
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2. Scope

The Company has defined the scope of stakeholders relevant to this Anti-Corruption Policy as follows:

- 2.1 This Anti-Corruption Policy shall apply to all personnel at every level of Ubon Bio Ethanol Public Company Limited and its affiliated companies, including permanent employees, fixed-term or temporary employees, consultants, interns, employees assigned to temporary duties elsewhere, domestic employees, temporary workers, agents, sponsors, and any other related persons.
- 2.2 Compliance with this Policy shall be deemed a condition of employment for all employees and must be observed in all locations where the Company conducts business operations.

3. Definitions under the Anti-Corruption Policy

1. **Corruption** means giving, requesting, agreeing to give, or undertaking any act in any form, such as offering, promising, granting, pledging to provide assets or any other benefits (“bribery”), to government officials, foreign government officials, officials of international organizations, government agencies, private entities, or persons with duties, whether directly or indirectly, in order to induce such persons to perform or refrain from performing unlawful acts or improper duties. It also includes requesting, accepting, or agreeing to accept assets or any other benefits improperly for oneself or others in exchange for performing or refraining from performing any act or duty, regardless of whether such act is lawful or unlawful, except where permitted by applicable laws, regulations, announcements, rules, local customs, traditions, or customary business practices.
2. **Company** means Ubon Bio Ethanol Public Company Limited.
3. **Affiliated Companies** mean Ubon Bio Agriculture Company Limited and Ubon Sunflower Company Limited.
4. **Personnel** means directors, executives, and employees of the Company and its affiliated companies.
5. **Executives** mean the Chief Executive Officer, Deputy Chief Executive Officer, Assistant Chief Executive Officer, department managers, and section managers of the Company and its affiliated companies.
6. **Employees** mean employees, contract employees, and supporting personnel of the Company and its affiliated companies.
7. **Supervisor** means a person acting as a department head within the Company or a person holding a higher position who has been assigned authority to supervise or oversee such department.

8. **Stakeholders** mean shareholders, customers, business partners, competitors, creditors, employees, society, communities, government agencies, and related organizations.
9. **Review** means the examination or reassessment of operations, procedures, conditions, events, or reports.
10. **Blood Relatives or Close Relatives** mean parents, siblings, spouses, children, children's spouses, and other close family members.
11. **Code of Business Conduct** means the standards and practices for conducting business in accordance with the Company's mission, aimed at achieving its vision and reflecting the corporate culture.
12. **Conflict of Interest** means any business activity in which personal interests or the interests of related persons, whether by blood relation or otherwise, influence decision-making and may obstruct or conflict with the best interests of Ubon Bio Ethanol Public Company Limited and its affiliated companies.
13. **Other Benefits** mean anything of value, including discounts, entertainment, services, training, or other similar benefits.
14. **Connected Transactions** mean connected transactions as defined by the regulations of the Stock Exchange of Thailand or transactions between the Company or its affiliated companies and directors, executives, or related persons under the Securities and Exchange Act.
15. **Related Companies** mean partnerships or juristic persons under Section 258 (3) to (7) of the Securities and Exchange Act B.E. 2535 (1992).
16. **Normal Course of Business** means fair pricing and conditions that do not result in the transfer of benefits.
17. **Gift** means money, assets, items, or any other benefits given as a gesture of goodwill, reward, affection, assistance, or appreciation.
18. **Assets** mean:
 - Speaker, lecturer, or consultant fees received on behalf of the Company;
 - Special privileges not generally available to the public, including discounted purchases of assets;
 - Special privileges relating to services or entertainment;
 - Payment of travel, accommodation, meals, tourism, or similar expenses;
 - Tickets, vouchers, or any other evidence of advance payment or reimbursement.

19. **Customary Practices** mean festivals or special occasions during which gifts may normally be exchanged, including occasions for congratulations, appreciation, welcoming, condolences, or assistance according to accepted social etiquette.
20. **Political Contributions** mean financial or other support provided to political parties, including the purchase of tickets for fundraising events or donations to organizations closely associated with political parties.
21. **Sponsorships** mean payments made for the purpose of obtaining business benefits, brand promotion, or enhancing the Company's reputation, which may carry risks because such payments are made in exchange for services or benefits that are difficult to measure and monitor.
22. **Facilitation Payments** mean small unofficial payments made to government officials solely to ensure or expedite routine governmental actions that do not involve the exercise of discretion and are lawful duties of such officials, including services or rights that a juristic person is legally entitled to receive, such as permits, certifications, or public services.
23. **Government Official** means political office holders, civil servants, local government employees with permanent positions or salaries, employees or persons working in state enterprises or government agencies, local administrators, members of local councils who are not political office holders, officials under local administration laws, and shall also include directors, subcommittee members, employees of government agencies, state enterprises, or government entities, as well as any person or group of persons authorized or assigned to exercise administrative powers of the State under the law, whether established within the civil service system, state enterprises, or other government operations.

4. Anti-Corruption Policy

The Board of Directors, executives, and employees shall neither engage in nor accept any form of corruption. The Company considers corruption to be unlawful conduct that undermines the credibility and integrity of the Company's business operations. Employees at all levels are required to strictly comply with this Anti-Corruption Policy, which applies to all business activities and transactions related to the Company, in order to prevent any adverse impact on the Company and society. The Company places importance on good corporate governance, transparency, and accountability, and therefore establishes the following Anti-Corruption Policy:

- 4.1 Directors, executives, and employees of the Company are prohibited from demanding or accepting any benefits or assets that may lead to the improper performance or omission of

duties within their responsibilities or may otherwise cause damage to the interests of the Company.

- 4.2 Directors, executives, and employees of the Company are prohibited from offering or providing any benefits or assets to external parties in order to induce such persons to perform or refrain from performing any act that is unlawful or improper in relation to their duties and responsibilities.
- 4.3 Any act deemed to constitute corruption shall be considered a serious offense, and the Company shall take strict disciplinary and/or legal action against the offender in accordance with the Company's regulations and applicable laws.
- 4.4 Anti-corruption standards are an integral part of the Company's business operations and are the responsibility of the Company's directors, executives, supervisors, employees, suppliers, and subcontractors, all of whom are encouraged to participate in expressing opinions and supporting anti-corruption practices in order to achieve the Company's anti-corruption objectives.
- 4.5 The Company shall continuously develop anti-corruption measures in compliance with applicable laws and ethical standards by conducting risk assessments of activities that may be susceptible to corruption and preparing practical guidelines and manuals for relevant persons.
- 4.6 The Company shall neither engage in nor support bribery in any form in all activities under its supervision, including charitable contributions, political contributions, business gifts, and sponsorships. Such activities must be conducted transparently and without any intention to improperly influence government officials or private sector personnel.
- 4.7 The Company shall establish appropriate and regular internal controls to prevent improper conduct by employees, particularly in sales, marketing, and procurement functions.
- 4.8 The Company shall provide anti-corruption education and training to directors, executives, and employees in order to promote honesty, integrity, and accountability in the performance of their duties, as well as to communicate the Company's commitment to anti-corruption practices.
- 4.9 The Company shall establish mechanisms to ensure transparent and accurate financial reporting.

5. Roles, Duties, and Responsibilities

5.1 Board of Directors:

The Board of Directors shall have the duties and responsibilities to oversee and supervise corruption risk management as follows:

- 1) To review, revise, and approve the Anti-Corruption Policy and guidelines of Ubon Bio Ethanol Public Company Limited and its affiliated companies.
- 2) To supervise compliance with the Anti-Corruption Policy and guidelines of Ubon Bio Ethanol Public Company Limited in order to ensure that management recognizes and places importance on anti-corruption practices and fosters them as part of the corporate culture.

5.2 Audit Committee:

The Audit Committee shall have the duties and responsibilities to review the financial reporting and accounting systems, internal control system, internal audit system, and risk management system to ensure that they comply with international standards and are appropriate, robust, up-to-date, and effective. This shall include assessing the adequacy and appropriateness of internal control measures relating to the Anti-Corruption Policy and guidelines of Ubon Bio Ethanol Public Company Limited and its affiliated companies.

5.3 Chief Executive Officer and Executives:

The Chief Executive Officer and executives shall have the duties and responsibilities to establish systems and promote and support the Anti-Corruption Policy as follows:

- 1) To communicate the Anti-Corruption Policy and guidelines of Ubon Bio Ethanol Public Company Limited and its affiliated companies to all relevant employees.
- 2) To review the appropriateness of systems and measures to ensure consistency with changes in business operations, rules, regulations, and legal requirements.
- 3) To support and promote anti-corruption values throughout Ubon Bio Ethanol Public Company Limited and its affiliated companies.

5.4 Internal Audit Office:

The Internal Audit Office shall have the duties and responsibilities to audit and provide consultation regarding inspections, risk assessment, and internal controls in accordance with the Anti-Corruption Policy and guidelines of Ubon Bio Ethanol Public Company Limited and its affiliated companies as follows:

- 1) To audit and review operations to ensure compliance with policies, guidelines, delegated authority, operational procedures, laws, and regulatory requirements in order to ensure that appropriate and adequate control systems are in place to address potential corruption risks, and to report the results to the Audit Committee.
- 2) To assess internal controls in each process to ensure that corruption risks are adequately covered.

6. Anti-Corruption Practices and Guidelines

- 6.1 The Board of Directors, executives, and employees at all levels of the Company shall strictly comply with the Anti-Corruption Policy and the Company's Code of Conduct and shall not become involved in any form of corruption, whether directly or indirectly.
- 6.2 The Board of Directors, executives, and employees of the Company shall not neglect or ignore any acts that may constitute corruption involving the Company. They must report such acts to their supervisors or responsible persons and cooperate in any fact-finding investigation. In case of doubt or inquiries, employees should consult their supervisors or persons assigned to oversee compliance with the Company's Code of Conduct through the designated communication channels.
- 6.3 The Company shall ensure fairness and protection for employees who refuse to participate in or report corruption involving the Company by implementing whistleblower protection measures or protections for those cooperating in reporting corruption, as specified in the Company's Good Corporate Governance Manual.
- 6.4 Any director, executive, or employee of the Company who engages in corruption shall be deemed to have violated the Company's Code of Conduct and shall be subject to disciplinary action in accordance with the Company's regulations.
- 6.5 The Company recognizes the importance of disseminating knowledge and promoting understanding among persons performing duties related to the Company or whose actions may affect the Company, in relation to compliance with this Anti-Corruption Policy.
- 6.6 The Board of Directors, executives, and employees of the Company shall not demand, undertake, or accept any form of corruption for the benefit of themselves, their families, associates, or acquaintances.

7. Guidelines on Gifts, Hospitality and Other Expenses

The Company has a policy prohibiting the giving or receiving of gifts in any form, including cash, with persons conducting business with the Company, except for customary gifts and hospitality of reasonable value intended to maintain good business relationships, without any expectation of receiving improper services or specific undue benefits in return. The giving or receiving of gifts and hospitality shall comply with the following principles:

- 7.1 Such gifts or hospitality must be in accordance with customary practices and accepted traditions.
- 7.2 Such gifts or hospitality must be reasonable, infrequent, and appropriate for the occasion.
- 7.3 Such practices must not violate any applicable laws, regulations, the principles of good corporate governance, or the relevant policies of the Company.
- 7.4 Directors, executives, and employees shall not accept money or any personal benefits from customers, business partners, or any other persons in connection with their duties performed on behalf of the Company.
- 7.5 Directors, executives, and employees shall not lend or borrow money, nor solicit money or assets from customers or persons conducting business with the Company, except for loans obtained from banks or financial institutions in the ordinary course as customers of such institutions.
- 7.6 The Company has no policy of offering money, incentives, gifts, special privileges, or any other benefits to customers, business partners, external organizations, or any persons in order to obtain business advantages, except for customary business hospitality, trade discounts, and the Company's promotional programs.
- 7.7 The Company recognizes the importance of communication and public relations in creating awareness and understanding among directors, employees, stakeholders, related companies, customers, business partners, external organizations, and other relevant persons regarding compliance with the Company's policy on gifts, hospitality, and other expenses.

8. Guidelines on Donations

- 8.1 To establish guidelines for monetary and/or in-kind donations for charitable or public benefit projects or activities, including donations or distributions to communities, government agencies, or social organizations, the Company has established policies, review procedures, and control measures as follows:

- 8.1.1 It must be verifiable that the charitable project or activity genuinely exists and is conducted in support of achieving its stated objectives and generating actual social benefits.
- 8.1.2 It must be verifiable that such charitable donations are not related to any reciprocal benefits for any specific individual, organization, or group of persons.
- 8.1.3 It must be verifiable that the recipient is a government agency or social organization listed on the official website of the Revenue Department, Ministry of Finance.

8.2 Guidelines on Charitable Contributions

- 8.2.1 The Company exercises caution regarding donations arising from requests, recommendations, or suggestions made by government officials or business partners, as such contributions may be construed as indirect bribery intended to obtain or retain business contracts, government approvals, favorable rulings, tax or customs privileges, or other business advantages.
- 8.2.2 The Company shall prepare a donation plan specifying the objectives, donation amounts, charitable organizations, or organizations listed by the Revenue Department or Ministry of Finance, which must be reviewed by the responsible approving authority prior to submission for management approval.
- 8.2.3 All donations must be approved by the Company's senior management in accordance with the anti-corruption measures. Proper and valid receipts must be obtained for every donation, and such donations shall be regularly reviewed either by the designated committee overseeing charitable contributions or by the Internal Audit Department.
- 8.2.4 The objectives of donations are to promote the Company's positive image, contribute to public benefit, and demonstrate the Company's social responsibility, without any expectation of benefits that may be deemed corrupt or improper. Such donations are also intended to enhance the Company's reputation and acceptance among communities surrounding the Company's operations, strengthen good relationships with stakeholders, and build long-term trust and confidence in the Company.

9. Guidelines on Sponsorships

Sponsorships are provided to support sustainable economic, community, and social development in areas such as quality of life, education, public health, religion, local traditions, disaster relief, or other appropriate causes, in order to support the successful implementation of projects, as well as to promote the

Company's positive image and reputation. Such sponsorships must not be made with the expectation of obtaining any improper benefit that may be deemed corruption. Therefore, the Company has established policies, review procedures, control measures, and evaluation processes regarding sponsorships as follows:

- 9.1 It must be verifiable that the sponsorship recipient has actually carried out the activities under the proposed project and that such activities genuinely support the successful achievement of the project objectives and provide actual social benefits, without being used as a pretext for the benefit of any particular group or individual.
- 9.2 It must be verifiable that sponsorships or any other benefits convertible into monetary value, such as accommodation, meals, goods, or labor, are not connected with any reciprocal benefits for any individual or organization, except for customary business acknowledgements or recognition.
- 9.3 The Company exercises caution with sponsorships arising from requests, recommendations, or suggestions by government officials or business partners, as such sponsorships may be construed as indirect bribery intended to obtain or retain business contracts, government approvals, favorable rulings, tax or customs privileges, or business advantages.
- 9.4 The Company shall prepare a sponsorship plan specifying the objectives, sponsorship amount, or the value of support that can be quantified monetarily, which must be reviewed by the responsible approving authority prior to submission for management approval.
- 9.5 All sponsorships must be approved by the Company's senior management in accordance with the anti-corruption measures. Proper and valid receipts or evidence of payment identifying the recipient must be obtained for every sponsorship, and such sponsorships shall be regularly reviewed by the Internal Audit Department.

10. Political Contribution Policy

The Company has a clear policy of not providing political support to political parties, political party officials, election candidates, organizations, or individuals involved in politics, whether directly or indirectly, except where permitted by applicable laws.

- 10.1 The Company prohibits employees from using the Company's assets to support any political party or political demonstration group in exchange for special privileges or improper benefits, whether directly or indirectly.
- 10.2 Employees are entitled to exercise their rights and freedoms as citizens under the Constitution and other applicable laws within the democratic system of Thailand to participate in political activities supporting democracy, provided that they use their own resources and personal time.

10.3 Directors, executives, and employees shall not participate in any activities or express any opinions that may cause others to understand that the Company is involved with or supports any political party or political demonstration group, which may lead to division or discord within the Company or the country.

11. Human Resource Management Practices

11.1 The Company places importance on human resource management factors and shall exercise due care in recruitment, training, performance evaluation, promotion, compensation, and employee reward programs, while strictly adhering to anti-corruption principles.

11.2 The Company provides directors, executives, and employees with education regarding policies and measures related to anti-corruption. Such policies and measures are included as part of the employee orientation program. The Company shall also inform employees of the measures they are required to comply with, together with the penalties for violations.

11.3 The Company continuously communicates and provides training regarding anti-corruption policies and measures to ensure that employees have a thorough understanding of the Company's anti-corruption practices.

12. Guidelines on the Employment of Government Personnel

The Company has established clear and appropriate criteria regarding the employment of government personnel in order to prevent such employment from being used as a means of obtaining undue benefits. The Company also requires disclosure of information relating to the employment of government personnel for transparency purposes, as follows:

- 1) The Company shall not consider employing or appointing government employees or government officials who are currently holding office, except in cases involving state enterprises, government agencies, or public authorities where the establishing regulations or applicable laws expressly permit such arrangements or permit representatives from such entities to perform duties within the organization. Such employment or appointment must comply with lawful procedures and objectives.
- 2) The recruitment, approval of employment, and determination of remuneration for hiring government employees or government officials for positions at the level of Assistant Managing Director or below, or as consultants, must be supported by reasonable necessity and approved by the Chief Executive Officer and President.

- 3) The Company is prohibited from employing government employees or government officials if such employment is intended to provide benefits to the Company or involves reciprocal benefits. Such employment must not involve or be intended to facilitate the improper exercise of authority or create conflicts of interest, including but not limited to the disclosure of confidential information of former government agencies, lobbying to obtain improper benefits, or assigning such personnel to contact their former agencies on behalf of the Company.
- 4) Information regarding the employment of government employees or government officials, together with the reasons for such appointments, shall be disclosed in the Company's annual registration statement/annual report (Form 56-1 One Report) for transparency purposes.

13. Guidelines on Facilitation Payments

The Company shall not make facilitation payments to government employees or government officials under any circumstances, as such payments carry a high risk of constituting bribery or other similar improper benefits, whether directly or indirectly.

All dealings with government agencies must be conducted transparently and in strict compliance with applicable laws and regulations.

14. Guidelines on Conflict of Interest

The Company's personnel must avoid any actions that may give rise to a conflict of interest with the Company. Any actions undertaken must be reasonable, carried out in the best interests of the Company, and in compliance with applicable laws, rules, and regulations. In the event that any act or circumstance may constitute a conflict of interest with the Company, the relevant personnel shall be required to report such conflict of interest through the channels designated by the Company.

15. Reporting of Corruption Incidents

All employees who become aware of any acts that may constitute corruption involving the Company or its affiliated companies shall report such matters to the responsible department or through the whistleblowing channels established by the Company, and shall cooperate in any fact-finding investigation. If employees have any doubts or questions as to whether any act or circumstance may constitute corruption, they may seek advice from the Internal Audit Department, which has been designated as the responsible unit for monitoring compliance with the Code of Conduct of Ubon Bio Ethanol Public Company Limited through the whistleblowing or complaint channels established by the Company.

16. Reporting Channels / Whistleblowing Procedures

The Company has established channels for complaints and whistleblowing regarding unlawful acts, unethical conduct, violations of the Anti-Corruption Policy, or any behavior that may indicate fraud or misconduct by individuals within the organization, including employees, executives, and stakeholders.

16.1 Objectives

The Company provides whistleblowing and complaint channels for reporting violations of laws, ethical standards, or conduct that may indicate fraud or misconduct by individuals within the organization, including employees and other stakeholders. Such reports may also relate to inaccurate financial reporting or deficiencies in internal control systems. The Company further establishes mechanisms to protect whistleblowers in order to enhance stakeholder participation in safeguarding the Company's interests more effectively.

16.2 Scope of Whistleblowing or Complaints

16.2.1 Violations of laws, fraud, corruption, breaches of the Company's rules or regulations, or violations of the Code of Conduct by directors, executives, or employees.

16.2.2 Irregularities in financial reports or deficiencies in internal control systems.

16.2.3 Matters that may adversely affect the Company's interests or reputation.

16.3 Whistleblowing or Complaint Channels Reports may be submitted through the following channels:

16.3.1 By e-mail to: cac@ubonbioethanol.com

16.3.2 By post addressed to: Audit Committee or Internal Audit Office
Ubon Bio Ethanol Public Company Limited
333 Moo 9, Na Di Subdistrict, Na Yia District,
Ubon Ratchathani 34160, Thailand

16.3.3 By telephone to the Internal Audit Office: 065-836-8845

16.3.4 Through the Company's website: www.ubonbioethanol.com

16.4 Conditions and Consideration of Whistleblowing Reports or Complaints

Details of the whistleblowing report or complaint must be factual, sufficiently clear, or supported by adequate evidence for investigation. All information received shall be treated as confidential, and the identity of the whistleblower or complainant shall not be disclosed to the public without consent.

Whistleblowers or complainants, whether employees or external parties, shall be protected. Recipients of complaints and persons involved in the fact-finding process must maintain confidentiality of all related information and disclose it only to the extent necessary, with due consideration for safety and protection.

16.5 Procedures

16.5.1 Upon receiving a complaint through the designated channels and procedures, the Internal Audit Office shall consider whether the information or evidence provided is sufficiently clear. If the information is insufficient, the complaint shall be closed and the complainant shall be informed, provided that the complainant's identity has been disclosed. If the information is sufficiently clear, the complaint shall be recorded in the complaint register. If the matter is deemed unrelated to suspected fraudulent conduct, it shall be forwarded to the relevant department for further action.

16.5.2 The Internal Audit Office shall consider forwarding the matter to the relevant responsible person (the "Investigator"), taking into account the independence required in handling the subject matter or issue raised in the complaint, in order to conduct a fact-finding investigation and follow up on progress to ensure that appropriate actions are taken. The following guidelines shall apply:

- 1) If the complaint concerns violations of personnel policies and procedures, non-compliance with laws and governmental regulations, corporate governance policies, the Code of Business Conduct, or the Company's rules and regulations, the matter shall be forwarded to the Human Resources Manager.
- 2) If the complaint concerns conduct that may indicate fraud, including acts intended to unlawfully obtain benefits for oneself or others, such as asset misappropriation, corruption, or fraud, the matter shall be forwarded to the Internal Audit Manager or the Audit Committee.
- 3) If the complaint under items (1) and (2) is complex or involves multiple departments, the matter shall be forwarded to the President and Chief Executive Officer for appointment of an Investigation Committee to conduct the investigation.

16.5.3 The Investigator under Clause 16.5.2 shall be responsible for conducting the fact-finding investigation, gathering and examining evidence, or establishing an

investigation committee to undertake such investigation in accordance with the authority granted.

- 16.5.4 If violations of laws, Company regulations, or fraudulent acts are identified, disciplinary action shall be taken in accordance with the Company's regulations and/or legal action may be pursued where such conduct violates applicable laws.
- 16.5.5 Upon completion of the investigation, the Investigator under Clause 16.5.2 shall prepare a summary report of the investigation results and notify the complainant accordingly (if the complainant has disclosed their identity). The results shall also be reported to the President and Chief Executive Officer and relevant management in the line of command. In cases involving conduct that may indicate fraud, the Audit Committee shall also be informed.
- 16.5.6 The Investigator shall submit a copy of the investigation report to the Internal Audit Office for acknowledgment and closure of the complaint record.
- 16.5.7 The entire process, from receipt of the complaint to notification of the outcome to the complainant, should be completed within an appropriate timeframe.

16.6 Protection Measures for Whistleblowers or Complainants

- 16.6.1 The Company shall not disclose the name, address, or any information that may identify whistleblowers, complainants, or persons cooperating in fact-finding investigations, and shall investigate whether the allegation has merit.
- 16.6.2 The Company shall keep all related information confidential and disclose it only to the extent necessary, taking into consideration the safety and potential damage to whistleblowers, complainants, persons cooperating in investigations, sources of information, and related persons.
- 16.6.3 If whistleblowers, complainants, or persons cooperating in investigations believe that they may suffer harm, insecurity, or inconvenience, they may request the Company to implement additional protective measures as appropriate. The Company may also impose additional protection measures where it deems there to be a risk of harm or insecurity.
- 16.6.4 Persons suffering damage or adverse effects shall receive appropriate and fair remedial measures.
- 16.6.5 The Company shall not take any unfair action against whistleblowers, complainants, or persons cooperating in investigations, including changes in position, job

description, workplace, suspension, intimidation, harassment, termination of employment, or any other unfair treatment arising from such reporting or cooperation.

17. Communication

The Company communicates information relating to anti-corruption measures, the giving and receiving of gifts and entertainment, hospitality and other expenses, as well as charitable contributions and political contributions, to employees, executives, affiliated companies, shareholders, customers, business partners, all groups of stakeholders, and relevant business parties through various channels. Such channels include monthly management meetings, notice boards, brochures, the Company's website, annual reports, or other appropriate means, including integration into annual activities, employee training programs, and orientation programs for new employees.

18. Disclosure of Information

The Company discloses information regarding anti-corruption measures to employees, executives, shareholders, customers, business partners, all groups of stakeholders, and related parties accurately, completely, and in a timely manner through easily accessible and reliable channels, including the Annual Report, the Company's website, and other appropriate means.

To ensure that the Company and its affiliated companies operate transparently and in a manner that can be audited and verified, the Company shall regularly review its Anti-Corruption Policy to ensure consistency with applicable rules, laws, regulations, and relevant best practices.

19. Record Keeping (Books and Records)

The Company undertakes all activities relating to information management in accordance with the Anti-Corruption Policy and Guidelines of Ubon Bio Ethanol Public Company Limited and its affiliated companies. The Company is committed to maintaining standards relating to operational systems, computer systems, and data communication systems, which form the foundation of an effective internal control system.

The Company shall implement various measures to ensure that the business operations of the Group, including the design and costs of control measures, are appropriate for the relevant information systems, operational systems, and computer systems. In order to achieve such commitment, the Company shall implement the following standards and procedures:

- 1) Establish responsibilities for users and administrators of all operational and computer systems.
- 2) Assess risks and establish risk control systems appropriate to changing environments.

- 3) Develop protection systems for information, operational systems, computer systems, and relevant personnel.
- 4) Establish information security systems to prevent unauthorized access, alteration, or misuse of information, whether caused intentionally or accidentally.

20. Audit Process, Corruption Risk Assessment, and Internal Control

The Company has established internal controls in alignment with anti-corruption measures by arranging for annual internal audit processes conducted by the Company's Internal Audit Office. The Company ensures the independence of internal auditors and does not impose limitations on the scope of their duties. In addition, the Company's accounts are audited quarterly and annually by certified public accountants.

The Audit Committee is responsible for ensuring that appropriate controls are in place so that business operations are conducted within proper and suitable boundaries and in compliance with the Company's policies, applicable laws, and regulatory requirements. The Audit Committee shall regularly monitor and review employees' compliance with the Company's policies, relevant procedures, laws, and applicable regulations.

21. Monitoring and Review

The Company shall ensure that this Policy and its related guidelines are monitored and reviewed regularly on an annual basis by all relevant parties in accordance with their respective roles and responsibilities.

If there is any suspicion that any activity or business transaction may violate this Policy, applicable laws, or relevant regulations, such information must be reported to the Managing Director or the relevant responsible persons through the whistleblowing or complaint channels established by the Company.

22. Guidelines for Monitoring and Evaluating Compliance with the Anti-Corruption Policy

The Company has established guidelines for monitoring and evaluating compliance with the anti-corruption measures and practices as follows:

- 22.1 Directors, executives, and employees are required to conduct self-assessments regarding their compliance with the Company's Good Corporate Governance and Business Ethics Manual, which includes the Company's corporate governance policy, business ethics, ethical standards, anti-corruption participation practices, anti-corruption preventive measures, and employees' code of conduct and practices on a regular basis.
- 22.2 The Internal Audit Department shall be responsible for reviewing the internal control system, risk management, and corporate governance processes, and for continuously providing

recommendations for improvement. Such reviews shall be conducted in accordance with the Company's risk management and internal control plans.

The Internal Audit Department shall also be responsible for continuously testing and assessing risks relating to fraud and corruption to ensure the effective implementation of anti-fraud and anti-corruption measures, as well as for monitoring, reviewing, and regularly improving such measures. The results of the assessment shall be presented to the Risk Management Committee and subsequently reported to the Board of Directors in a timely manner.

Reviewed and announced on 24 February 2026.

-Signed-

(Mr. Palakorn Suwanrath)

Chairman of the Board of Directors

Ubon Bio Ethanol Public Company Limited