Announcement BCPG Public Company Limited

No. : 10000/006/2026

Subject : Compliance Governance Framework

Date : 30 October 2026

Compliance Governance Framework

BCPG Public Company Limited (the "Company" or "BCPG") pursuant to the resolution of the Board of Directors' Meeting No. 8/2026 held on 25 June 2026, has announced the establishment of an Office of Corporate Compliance and Corporate Secretary, to enable the businesses of BCPG and BCPG Group to comply with applicable laws and regulations of Thailand and other countries, achieve acceptance from various stakeholders, and avert risks arising from non-compliance with laws and regulations by their directors, management, and employees.

Additionally, the Board of Directors' Meeting of BCPG No. 4/2026 held on 20 March 2026, has resolved to approve amendments to the Good Corporate Governance Policy by expressly adding, as Clause 7. of Section 3 and Section 4 thereof, provisions on compliance with the anti-money laundering and combating the financing of terrorism (AML/CFT) and sanctions laws and regulations. This is to demonstrate strong regulatory compliance and governance, and to appropriately assess and manage risks in transactions. The Board of Directors also resolved to extend the Compliance Governance Framework to cover the companies within BCPG Group, so as to ensure a uniform standard of practice. Therefore, the Chief Executive Officer and President deems it appropriate to issue the Compliance Governance Framework and the Sanctions Guidance.

In this regard, BCPG hereby issues the Compliance Governance Framework, as set forth in the attachment hereto, for the review, understanding, and compliance of all directors, officers, and employees of the BCPG and BCPG Group, as well as other persons working on behalf of the BCPG, to serve as a standard for the conduct of their duties and shall be their direct responsibility to comply. Accordingly, all such persons shall comply with the following:

1. Comply with all relevant laws, rules, regulations, and licensing requirements in every country in which BCPG and BCPG Group conduct business.
2. Comply with the Compliance Governance Framework in relation to matters that are material to the business operations of BCPG and companies within the BCPG Group, covering at least the following areas:
    1) Antitrust and competition laws
    2) Anti-corruption and anti-bribery
    3) Anti-money laundering and combating the financing of terrorism (AML/CFT) and sanctions
    4) Human rights, labor standards, stakeholder engagement, anti-SLAPP and ESG compliance
    5) Data, intellectual property and regulatory compliance
    6) Energy and infrastructure regulatory compliance, including compliance with the requirements set out in licenses, Power Purchase Agreements (PPA), Concession Agreements, and applicable requirements of relevant regulatory authorities.

    To facilitate effective implementation of the Compliance Governance Framework in each relevant area, BCPG may develop and implement, as appropriate, standards, procedures, guidelines, and operating manuals relating to the matters described above.
3. Comply with policies, standards, codes of conduct, guidelines, and operational manuals, including appropriate practices for the business of BCPG and BCPG Group, even if not expressly covered by this Compliance Governance Framework.

Under this Compliance Governance Framework, executives of BCPG and BCPG Group must conduct themselves as good role models, and employees at all levels of BCPG and BCPG Group must understand and comply with, in order to achieve the objectives and goals set forth herein.

Accordingly, the Company has established the following Compliance Governance Guidelines:

1. **Comply with the antitrust and competition laws, while encouraging free and fair business competition without discrimination or taking advantage of others.**

Objectives

BCPG has committed to comply with antitrust and competition laws, which are in force in almost every country these days, to provide protection of serious, free, and fair competition and prevent unsuitable trade constraints, collusion, or hindrances to competition, without limiting competition or colluding with competitors, without unlawful monopolistic and trade competition violations. These offenses include engagement in a price-fixing agreement with competitors. Employees and parties working on BCPG's behalf who commit in such actions shall be liable for hefty fines or imprisonment and, in some countries, BCPG could be subjected to the compensation due to such business hindrance.

Guidelines

1.1 Never engage in price-fixing collusion between BCPG and competitors.

1.2 Never engage in an agreement with competitors to distort competition, including an agreement to limit outputs or deliver goods, or an agreement to allocate outputs or sales volumes by customer group, zone, or product. Never discuss or negotiate costs or set prices with competitors, which includes returns, sales volumes, price offer formulas, profit margins, prices and discounts, credit terms and also avoiding price competition.

1.3 Be caution in engaging in research, information sharing, or activities with competitors. If information is needed, it shall give the first priority to public information.

1.4 Never engage in an agreement to distort opportunities for business partners, sales agents, or other parties.

1.5 Never join competitors in pressuring the public sector against policy-making or actions taken to promote free and fair trade competition.

1.6 Unless permitted by law, never invest, merge with, or acquire a business for a monopoly or diluted market competition.

1.7 If BCPG would like to conduct an overseas business through joint venture, mergers and acquisition, or acquiring another's business, responsible units must first examine legal provisions on anti-monopoly or trade competition of the given country. They must ensure that the counterparty has comply with the regulation related to joint ventures, mergers and acquisitions, or business acquisition.

1.8 Never exploit an association or trade group in contacting or accessing competitors to violate the law or BCPG's policies, including price discussion or sensitive competition issues.

2. Comply with anti-corruption and anti-bribery Laws involving both public and private sectors worldwide

Objectives

BCPG has committed to combat corruption activities and avert any act regarded as giving or accepting bribes which is involving public and private sectors, particularly when contacting with public agencies. Corruption activity is contradicted to BCPG's objectives and also violated the laws.

Guidelines

2.1 The executives and employees of BCPG and BCPG Group shall strictly comply with the BCPG's Good Corporate Governance Policy and anti-corruption laws.

2.2 Any types of bribery; an awarding, giving, proposing, agreeing to give, assets entertainments, travel arrangements, or any other special benefits to Public Official, including Overseas Public Official or International Organization Official, is prohibited, whether such items are actually handed over or not and including any act by its agents.

"Public Official" means a political position holder, government official, local official with a regular position or salary, employee or person serving a state enterprise or public agency, local administrator and local non-political assemblyman, competent officer under local administration laws, and a director, subcommittee member, employee of a public agency, state enterprise, or government agency, person(s) exerting authority or assigned authority to use public administrative power under the law, whether it is establishment of a body under bureaucracy, a state enterprise, or other public businesses, or a political party official.

"Overseas Public Official" means a position holder in the legislative, administrative, or judiciary branch of a foreign state and anyone performing government service on behalf of a foreign state, through appointment or election (permanent or temporary position) and regardless of compensation.

"International Organization Official" means a staffer of an international organization or one assigned to serve on its behalf.

"Public Agency" means a Thai or an international government agency, state enterprise, or public organization.

2.3 In case of coordinating with Public Agency in order to examine the validity of documents and data for the given transactions, if expenses are incurred, the responsible unit shall be liable in considering whether such expenses have complied with the Public Agency regulations and/or appropriate to the transaction or not.

2.4 In case of the agent has been appointed for working or coordinating on behalf of BCPG with Public Agency, Overseas Public Official or International Organization Officials, BCPG shall not instruct its agents to commit or take any action related to corruption activities.

2.5 During the negotiation, never propose a position or promise to employ anyone who is working in a Public Agency or anyone that can possibly coordinate with BCPG and such person is authorized to make any decision related to BCPG's business.

2.6 In case of private agency, BCPG shall follow the same procedure as defined for Public Agency, except otherwise provided contrary. For instance, selecting new employee that is currently serving in such private agencies. The selection process shall first comply with BCPG's Human Resources Administration procedures. If there is any difficulty in interpreting procedures, such question(s) shall be referred to Legal Department.

3. Comply with anti-money laundering and combating the financing of terrorism (AML/CFT) laws

Objectives

BCPG is committed to against any transaction classified as money laundering and sponsoring of terrorism. "Money laundering" means any engagement in financial transactions by criminals, terrorists, or any other party to conceal sources of unlawful capital. As a rule, money laundering needs a series of transactions, after which it apparently seems lawful. Action by only a single person in BCPG to aid money laundering—through of personal intention—could bring to BCPG criminal and civil litigation and defame its reputation.

Guidelines

3.1 In contacting customers or business partners, BCPG shall examine its customers or partners through Know Your Customer (KYC), Customer Identification Procedure (CIP), or Customer Due Diligence (CDD) in order to identify basic information, including authorized directors, the major original shareholder with 10% upward of

the capital or as required by the applicable laws and regulations, and customers' objectives and intention of business relationship. For the avoidance of any doubt, cross-check through government documents or credible independent organizations may be required—a simple yet efficient method to prevent BCPG from becoming a money-laundering or terrorism-sponsoring middleman.

3.2 Be caution when engaging in any juristic acts, financial or business contracts or transactions, or actions concerning properties with persons or juristic persons suspected of conducting unlawful activities or breaking money-laundering laws. For Instances of such violations includes:

- Narcotics;
- Human trafficking under the prevention and suppression of human trafficking laws or offenses under the criminal code for sexual offenses, including trafficking of women and children;
- Public fraud under the criminal code or offenses under laws on fraudulent borrowing or offenses involving business embezzlement or fraud in financial institutions;
- Embezzlement, fraud, or violence toward others' belongings and malfeasance under laws on financial institution business or securities and exchange laws;
- Bureaucratic malfeasance;
- Smuggling under customs laws;
- Terrorism under the criminal code;
- Gambling operation; and
- Violation of intellectual property rights for goods or commercial offenses under laws on the protection of intellectual property rights.

3.3 Never conceal the true nature of acquisition, locations, sales, transfers, or entitlement of property rights including never possess or employ properties involved in the violation of laws on money laundering and sponsoring of terrorism.

3.4 Cooperate with applicable agencies in complying with measures to prevent and suppress money laundering and sponsoring of terrorism drawn up in Thailand and overseas.

4. **Comply with applicable sanctions when dealing with certain countries, regions and persons, including, but not limited to, sanctions administered and enforced by the United Nations, the United States, the European Union and the United Kingdom**

Objectives

BCPG and BCPG Group shall conduct their businesses in compliance with sanctions when dealing with certain countries, regions and persons, including, but not limited to, sanctions implemented, administered and enforced by the United Nations, the United States, the European Union and the United Kingdom, to the extent they apply to BCPG's businesses.

Guidelines

4.1 The executives and employees of BCPG and BCPG Group shall strictly comply with the good corporate governance policy in relation to the sanctions measure, including BCPG's Sanctions Guidance.

5. **Comply with legislation on labor, human rights, human dignity, and respect for the freedom and equality of those granted protection**

Objectives

The work of BCPG's executives, employees, and contractors shall be based on labor rights, human rights, human dignity, and respect for the freedom and equality of people under the international laws and standards, both domestically and internationally, for Instance the International Labor Standards of ILO (International Labour Organization) and the Universal Declaration of Human Rights. BCPG opposes the deployment of the juristic process to retaliate or block any parties that have expressed their views or acted to protect the public interest (Anti-Strategic Litigation Against Public Participation: Anti-SLAPP)

Guidelines

5.1 Never hire unlawfully under the laws of Thailand and BCPG counterparty regulations. If laws yield for different outcomes, adhere to one with the strictest labor protection standards or consult Legal Department before further action.

5.2 Never discriminate or treat people unfairly due to differences in nationality, race, skin color, origin, religious belief, social status, gender, age, physical appearance, language, political opinion, property, or any other status.

5.3 Comply with the international labor standard under ILO's conventions, protocols, or recommendations in Thailand and every country where BCPG operates.

5.4 Comply with BCPG's Policy on Business Responsibility for Respecting Human Rights.

5.5 Never sue those persons who have expressed their views or acted to protect the public interest against BCPG's businesses, except for false or dishonest views. Questions can be referred to Legal Department.

6. Comply with intellectual property laws, while respecting others' intellectual property rights, promoting intellectual property works, including protecting BCPG's intellectual property rights against infringement

Objectives

BCPG has committed to upgrade its management excellence standard. BCPG values creativity, and protection of innovations, intellectual properties ("IPs"), and other proprietary knowledge, whether owned by BCPG or by third parties. Such commitment is regarded as the direct responsibility of all executives, employees, affiliates, and contractors acting on behalf of BCPG.

Guidelines

6.1 Comply with laws related to IPs of Thailand and/or every country where BCPG has its branch office operated.

6.2 Disclose to superiors in complete and accurate of any accomplishments, inventions, and knowledge resulting from duty or BCPG's support promptly. The relevant person shall acknowledge and agree that all such IPs shall be the sole and exclusive property of BCPG, unless otherwise expressly agreed in writing by BCPG. Upon termination of employment, such person shall deliver and transfer to BCPG all such IPs and any related information, irrespective of the form or medium in which such information is maintained or stored.

6.3 Maintain critical documents, trade secrets, and other information classified as the confidential information of BCPG, business partners, and stakeholders in secure places with suitable and standard accessible. Never disclose them to any third party

who doesn't have right to know. These responsibilities shall survive the termination of position as an executive or employee of BCPG.

6.4 Comply with BCPG's Good Corporate Governance Policy in relation to IPs.

7. Comply with applicable laws and regulations in all countries where BCPG and BCPG Group conduct businesses, and maintain a consistent legal and compliance standard

Objectives

BCPG and BCPG Group shall conduct their businesses in full compliance with laws and regulations. All executives and employees are responsible for complying with all applicable laws and regulations in each country where BCPG and BCPG Group operate.

Guidelines

7.1 All executives and employees are responsible for mastering their duties, specifically how they relate to compliance with laws and regulations. For questions related to these ambiguity, they shall first investigate, ask their superiors or refer further questions to Legal Department respectively.

7.2 Executives are responsible for promoting their respective employees' mastery and compliance with applicable laws and regulations and for encouraging them to actively examine laws and regulations relevant to their working obligations so as to fulfill their responsibilities. Any query shall be referred to Legal Department.

7.3 All executives and employees are responsible for reporting to their superiors any violations of laws and regulations, and promptly notifying Legal Department.

7.4 Promote regular knowledge sharing and legal operations among group companies through meetings, case studies, or training, to achieve correct understanding and unified standards.

7.5 Establish standard contract templates or standard clauses for use in key matters and require relevant departments to primarily use such templates. If it is necessary to amend any material terms of standard contracts, such amendments must be reviewed and opined by the Legal Department before every execution.

7.6 When a dispute or lawsuit arises, whether the company is a plaintiff or defendant, the relevant department must promptly notify the Legal Department, along with

preparing information, relevant documents, and a preliminary impact assessment, so that the Legal Department can review and analyze the case status.

7.7 In cases disclosed in the notes to the financial statements, or cases that significantly affect the image, financial position, or business operations of the BCPG Group, such as environmental cases that have a widespread impact, cases involving violations of human rights or labor rights, cases receiving widespread public or media attention, cases in which the Stock Exchange of Thailand or government authorities make inquiries or request clarification of facts, cases involving an amount in dispute of THB 500 million or more, cases where the company is required to recognize provisions for bad debts or doubtful debts in accordance with the accounting standards applicable to the company involved in the case, cases with major business partners that affect revenue, cases that affects the obtaining of a principal license or an important operating license, or cases that may cause a significant project or business operation to be delayed or suspended, the respective department and Legal Department must escalate to the Chief Executive Officer and President in order to establish a joint litigation strategy.

7.8 Develop and implement information systems to systematically support legal operations. Such systems should cover legal advisory functions, contract review processes, storing important legal document such as licenses and agreements, with designated responsible persons and advance notification mechanisms prior to the expiration of licenses or agreements, to ensure timely renewal. The system must ensure that all recorded information is complete, accurate, and up to date. Establish access rights and data security measures, including data backup procedures and appropriate document retention periods. The system must also be regularly reviewed and assessed for effectiveness and continuously improved to align with operational usage and organizational needs.

The Compliance Governance Framework shall take effect on 30 October 2026 and remain in force thereafter.

(Mr. Rawee Boonsinsukh)

Chief Executive Officer and President

Authorized Director

Notes

***Framework Review*:** To ensure that this framework remains current and aligned with changes in laws, international developments, and the Company's business operations, it shall be reviewed regularly every 2 years or whenever a significant event has a material impact.

***Contact and Further Information*:** For questions or suggestions, or to report any violation of or non-compliance with this framework, please contact Office of Corporate Compliance and Corporate Secretary or use the Company's grievance reporting channels.