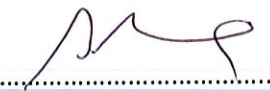

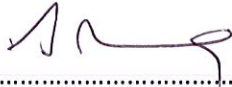


Banpu Public Company Limited Company Secretary & Governance Department	POLICY	
Authorized by :  () Chief Executive Officer	Subject : Anti-corruption Policy	
	Document No.: TH-CSG-CSG-PO-01 	
	Revision: 00	
	Date: 05/04/15	Page No.: 1 of 10

Content

1. Definition	2
2. Purpose of Anti-Corruption Policy.....	3
3. Policy Statement.....	3
4. Application of the Policy	
4.1. Persons involved in the Policy.....	3
4.2. Corruption.....	3
4.3. Gift, Hospitality, and Entertainment.....	3
4.4. Charitable Contributions.....	4
5. Responsibility.....	4
6. How to Raise Concern and Protection Measure (Whistle Blowing Policy).....	4
7. Communication.....	4
8. Effective System to Counter Corruption	
8.1. Preventive Measures.....	4
8.2. Corrective Measures.....	6
9. Enforcement and Punishment.....	6
10. Appendices (Related Chart / Work Process).....	7



Banpu Public Company Limited Company Secretary & Governance Department	POLICY	
Authorized by :  () Chief Executive Officer	Subject : Anti-corruption Policy	
	Document No.: TH-CSG-CSG-PO-01 <i>BC</i>	
	Revision: 00	
	Date: 05/04/15	Page No.: 2 of 10

1. Definition

"Banpu" means Banpu Public Company Limited.

"Directors" means any and all directors of Banpu.


"Audit Committee" means a group of independent directors who are in charge of corporate oversight to financial reporting and disclosure, regulatory compliance, risk management, and other related corporate issues.

"Corruption" means providing, offering, promising, authorizing or paying, demanding, or receiving money, assets or other kinds of benefits that are intended to induce the Recipient to abuse his or her position in order to improperly enable Banpu to obtain preferential treatment or otherwise gain inappropriate advantages.

"Recipient" means government officer and representative, private officer, politician, trading party, customer, labor union, relevant stakeholder and any other individual, who directly or indirectly direct, support to direct or cause to be directed any advantages to Banpu.

"Employees" means the management at all levels, and officers of Banpu and its subsidiary companies whether on permanent, fixed term, or temporary employment basis in every business unit and operation site.

"Delegation of Authority" means the list of authority that CEO has subsequently deployed to the management for day-to-day operation in order to approve the requisition based on value of transaction and levels of the management.

Banpu Public Company Limited Company Secretary & Governance Department	POLICY	
Authorized by :  () Chief Executive Officer	Subject : Anti-corruption Policy	
	Document No.: TH-CSG-CSG-PO-01 <i>BCN</i>	
	Revision: 00	
	Date: 05/04/15	Page No.: 3 of 10

2. Purpose of Anti-Corruption Policy

The Board of Directors, all of the management and officers of Banpu are committed to conducting operations in compliance with applicable laws, good governance and integrity practices stated in Banpu Missions, Corporate Governance Policy, Code of Conduct, Banpu Spirit (Integrity Value), and high ethical standards.

The purpose of the Anti-corruption Policy is to establish controls and reiterate Banpu's commitment to the full compliance. This shall ensure that Banpu business shall be conducted in a good governance manner.

3. Policy Statement

Banpu has conducted and shall conduct businesses, both locally and internationally, in an honest and ethical manner and with commitment to acting professionally, fairly, and with integrity in all business deals and business relationships, of which the practices lead to a zero tolerance counter Corruption.

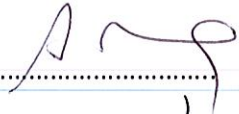
"Directors" and "Employees" are prohibited from carrying out or accepting any type of wrongful money, assets, compensation, and other benefits either directly or indirectly. However, to the extent as allowed by law, regulation, announcement, local culture, local norm or business practice, gifts of reasonable values are acceptable.

4. Application of the Policy

4.1. Persons involved in the Policy

The Policy applies to all Directors and Employees.



Banpu Public Company Limited Company Secretary & Governance Department	POLICY	
Authorized by :  () Chief Executive Officer	Subject : Anti-corruption Policy	
	Document No.: TH-CSG-CSG-PO-01 <i>BCN</i>	
	Revision: 00	
	Date: 05/04/15	Page No.: 4 of 10

This policy has been initially considered by the Audit Committee, formally approved by the Board of Directors, and has been a part of Anti-corruption Certification Process of the Private Sector Collective Action Coalition Corruption (CAC). This policy may be revised from time to time as appropriate.

As CAC has been involved in the policy, CAC is permitted to review the sufficiency of the implementation procedure of Banpu every three years.

4.2. Corruption

Directors and Employees must not engage either directly or indirectly in any form of Corruption or through a third party.

4.3. Gift, Hospitality, and Entertainment¹

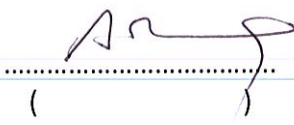
Employees can offer or give any gift, hospitality, or entertainment to Recipient not exceeding the value indicated in the table of Delegation of Authority unless approved in writing by CEO.

Employees must not offer or give any gift, hospitality, or entertainment which could be regarded as illegal or improper to the Recipient.

4.4. Charitable Contributions

Employees can provide charitable contribution not exceeding the value indicated in the table of Delegation of Authority unless approved in writing by CEO. However, Political Contribution that is legal and ethical under laws, regulations, and practices shall be treated in the same manner as Charitable Contributions.

¹ Gift, Hospitality, Charitable Contribution, Entertainment requested through "Directors" will be considered under "Banpu" Work Flow and Management Delegation of Authority

Banpu Public Company Limited Company Secretary & Governance Department	POLICY	
Authorized by :  () Chief Executive Officer	Subject : Anti-corruption Policy	
	Document No.: TH-CSG-CSG-PO-01 <i>BCU</i>	
	Revision: 00	
	Date: 05/04/15	Page No.: 5 of 10

5. Responsibility

Directors and Employees must read, understand and comply with this policy. All are required to avoid any activity that might lead to a breach of this policy.

The prevention, detection, monitoring and reporting of any forms of Corruption are the responsibility of all Directors and Employees.

6. How to Raise Concern and Protection Measure (Whistle Blowing Policy)

Directors and Employees have been encouraged to raise concerns about any suspicion of CG malpractices including Corruption at the earliest possible stage through the "Complaints Channel"² and Internal Audit Department. The received issues shall be investigated by the Investigation Committee following the standard practice manual of Corporate Fraud Management³.

Banpu has established "Whistle Blowing Policy"⁴ in 2014 to protect Employees (Whistle Blowers) who report any wrongdoing against the laws, rules and Regulations, Anti-Corruption Policy, Corporate Governance, and Code of Conduct.

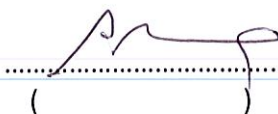
7. Communication

Banpu shall arrange internal communication through training and orientation to Employees that genuinely educate Employees on the Anti-Corruption Policy. Banpu shall publicly announce and disclose the policy in an Annual Report, 56-1 and Banpu website, and communicate to all stakeholders.

² "Complaint Channel" has been implemented since 2005 and available for all stakeholders on Banpu website.

³ "Corporate Fraud Management" has been managed the suspicious circumstances since December 8, 2008.

⁴ "Whistle Blowing Policy" was approved by the board in December 2014.

Banpu Public Company Limited Company Secretary & Governance Department	POLICY	
Authorized by :  () Chief Executive Officer	Subject : Anti-corruption Policy	
	Document No.: TH-CSG-CSG-PO-01 <i>sch</i>	
	Revision: 00	
	Date: 05/04/15	Page No.: 6 of 10

8. Effective System to Counter Corruption

8.1. Preventive Measures

8.1.1. Procurement Policy and related Work Process

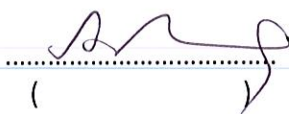
Banpu has issued and implemented Procurement Policy and other related work procedures since 2011 to govern purchasing requisition and order placement, goods and services invoices and receipts, claim and reject goods and services, imported goods, bidding and tendering, logistic management and goods procurement. All of procurement executions are run on the portal work flow so called "iProcurement" and systematically recorded for reference and for auditing purpose.

8.1.2. Accounting Record System

The consolidated and unconsolidated financial statements have been prepared in accordance with the Thai Financial Reporting Standards (TFRS) which has largely adopted the International Financial Reporting Standards (IFRS). The TFRS has been approved by the Federation of Accounting Professions. In addition, the preparation of financial statements shall follow the requirement of the Office of the Securities and Exchange Commission.

8.1.3. Corporate Compliance Policy

Banpu has established Corporate Compliance Policy and Manual Procedures together with Regulatory Compliance Checklist (RCC) as a tool of self-assessment. This shall support all units of Banpu to comply with relevant laws, regulations, internal and external standards and guidelines which have been occasionally amended by regulators.

Banpu Public Company Limited Company Secretary & Governance Department	POLICY	
Authorized by :  () Chief Executive Officer	Subject : Anti-corruption Policy	
	Document No.: TH-CSG-CSG-PO-01 <i>fch</i>	
	Revision: 00	
	Date: 05/04/15	Page No.: 7 of 10

8.1.4. Assessment and Mitigation of Corruption Risk in the Business

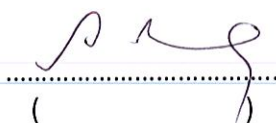
Banpu has performed Risk Management covering Strategic Risk, Financial Risk, Risk in Coal and Power Business, Risk from Political and Regulatory Changes in the operation countries, and HSEC Risk for many years. Currently, Banpu has executed Risk Assessment for Anti-Corruption in all operation and support functions. The process starts with a comprehensive activity-based identification of corruption risk factors of business units and their possible causes. Mitigation measures are provided and the assessment is performed at least once a year.

8.1.5. Internal Control System

The Board of Directors of Banpu has designated the Audit Committee to regularly review the adequacy and appropriateness of Banpu internal control system for Banpu risks. This shall assure effective, efficient, and transparent operation. Since 2013 Banpu has revised Internal Control System to adopt the COSO (the Committee of Sponsoring Organizations of the Treadway Commission), which is international standard. COSO Internal Control shall focus on Commitment to Integrity and Ethical Value, the Board Responsibility, Organization Structure and Authority, Employees' Commitment to Competency and Accountability, Business and "Corruption Risk Assessment", Communication, and Control-Monitor- Report Procedures.

8.1.6. CG Policy and Code of Conduct

The Board of Directors of Banpu formulated the CG Policy and Code of Conduct in 2002 and revised in 2005 and 2012, respectively. The documents are available in Thai, English, Indonesian, and Chinese, which aim for the standard practice guidelines for all operation sites. Directors and Employees shall have commitment to read, understand, and perform as stated in the CG Policy and Code of Conduct accordingly.

Banpu Public Company Limited Company Secretary & Governance Department	POLICY	
Authorized by :  Chief Executive Officer	Subject : Anti-corruption Policy	
	Document No.: TH-CSG-CSG-PO-01 <i>Ben</i>	
	Revision: 00	
	Date: 05/04/15	Page No.: 8 of 10

The CG Policy gathers all significant corporate policies including:

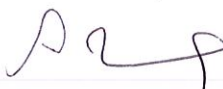
- Policy related to Shareholders; Shareholder Rights and Shareholder Meetings
- Policy on Conflict of Interest
- Policy on Stakeholders
- Policy on Information Disclosure, Transparency, Financial and Operation Reporting
- Policy on Risk Management
- Policy on Internal Control
- Policy on Monitoring and Evaluation Performance
- Policy on Succession Plan
- Sustainable Development Policy
- Whistle Blowing Policy

To enhance CG policy and Code of Conduct in practice, Banpu has raised and strengthened CG awareness through continuous CG activities and full supports of corporate values called "Banpu Spirit".

8.2. Corrective Measures

8.2.1. Corporate Fraud Management

Suspicious issues or circumstances received either through Complaint Channel or Internal Audit Report shall be processed through the Corporate Fraud Management Procedure. The Investigation Committee shall conduct fact findings and provide the result and recommendation to CEO for consideration and final execution.

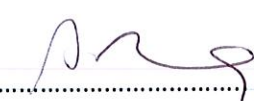
Banpu Public Company Limited Company Secretary & Governance Department	POLICY	
Authorized by :  () Chief Executive Officer	Subject : Anti-corruption Policy	
	Document No.: TH-CSG-CSG-PO-01	<i>Bch</i>
	Revision: 00	
	Date: 05/04/15	Page No.: 9 of 10

8.2.2. Monitoring and Reporting

The complaints related to CG from both Complaint Channel and Corporate Fraud Management Procedure will be reported to the Governance and Nomination Committee on the quarterly basis and reported to Banpu Board accordingly. Moreover, the issues investigated by the Internal Audit Department will be monitored by Audit Committee on monthly basis and reported to Banpu Board on semi-annual basis.

9. Enforcement and Punishment

It is clearly defined in the Company Regulations Clause 9 "Discipline and Punishment" that the corruption is considered as a "Serious Disciplinary Offense", which is subjected to the most severe punishment, i.e. dismissal or fire.

Banpu Public Company Limited Company Secretary & Governance Department	POLICY	
Authorized by :	Subject : Anti-corruption Policy	
	Document No.: TH-CSG-CSG-PO-01 <i>BCN</i>	
(.....)	Revision: 00	
Chief Executive Officer	Date: 05/04/15	Page No.: 10 of 10

Appendices

- Appendix1. Work procedure - Purchase Order Placement
- Appendix2. Work procedure - Group Accounting Policy
- Appendix3. Work procedure - Corporate Compliance Policy
- Appendix4. Work Procedure - Anti-Corruption and Risk Assessment
- Appendix5. Work Procedure - Internal Control System
- Appendix6. Work Procedure - CG Policy and Code of Conduct