

Environmental and Social Management Policy

Principle

Gulf Energy Development Public Company Limited (the “Company”) is committed to conducting business in a sustainable manner to achieve long-term growth while taking into account economic, environmental and social risks and opportunities. The Company has therefore adopted an Environmental and Social Management System (ESMS) Framework as the foundation to its approach to all operations and activities across the Gulf Group, in line with national laws and international standards including the Asian Development Bank Safeguard Policy Statement, the Universal Declaration of Human Rights, relevant International Organization for Standards (ISO) standards, or other internationally recognized guidelines, recommendations or standards.

Objective

This policy sets out the principles and guidelines under which all Company employees are expected to operate in order to ensure that the Company is able to achieve long-term growth while upholding its commitment to environmental and social responsibility.

Scope

This policy applies to all members of the Gulf Group of Companies including members of the Board of Directors, executive management and employees. It covers and shall be applied to all business facilities, operations and activities* undertaken by the Gulf Group of Companies. It also applies, where possible, to the Company’s counterparties including business partners, suppliers, contractors and individuals under the company’s supervision.

Oversight

This environmental and social management policy has been approved by the Board of Directors. Revisions to the policy shall be advised by the Sustainability, Governance and Risk Management Committee (SGRC), who shall also represent the Board of Directors in providing oversight for the Company’s environmental and social performance in line with this policy.

Roles and responsibilities

All employees of the Company are responsible for implementing the policy at the operational and management level as appropriate, including setting targets for environmental and social performance, and providing regular performance reports to the management. The Sustainability and Risk Management department shall be responsible for coordinating with the relevant functions to monitor such performance and provide regular reports to the SGRC. The implementation of this policy shall be regularly evaluated by the Internal Audit department and data may be verified by a third party as required.

References

Gulf Sustainability Policy
Gulf Sustainability Framework
Asian Development Bank Safeguard Policy Statement
United Nations Universal Declaration of Human Rights
ISO Standards

*Key activities include the production of electricity and other products, the provision of services, the transport and/or distribution of such products and services, the management of waste and/or byproducts, managerial and administrative activities, supplier/contractor selection, and project development (including mergers and/or acquisitions), as well as related due diligence activities.

Policy

Gulf Energy Development Public Company Limited recognizes the importance of conducting business with environmental and social responsibility while working to reduce negative impacts along the value chain, from project planning and development to operations and maintenance to decommissioning, and including related business and support activities such as supplier selection and procurement, distribution and logistics, mergers and acquisitions, and managerial and administrative activities. The Company shall strive to do so with a focus on the following areas.

1. General provisions

- 1.1. The Company shall implement and maintain an environmental and social management system (ESMS) covering key issues as outlined in the Company's Sustainability Framework as well as context-specific issues where required, and will work to continuously improve its environmental and social management performance throughout the organization.
- 1.2. The ESMS shall cover all businesses under the Company, including any sites under the Company's management, and shall apply to all key business activities including: due diligence and feasibility studies, mergers and acquisitions, project implementation, operations, logistics and transmission / distribution, and decommissioning, as well as goods and services provided to the Company.
- 1.3. The Company shall comply with relevant national laws at a minimum, and shall strive to comply with other applicable national and international environmental and social safeguard requirements or other relevant regulations related to environmental and social management.
- 1.4. The Company shall collaborate with, and communicate its commitments and expectations to, key counterparties, including contractors, suppliers and business partners, as well as other stakeholders throughout the Company's value chain, to encourage increased awareness of environmental issues, develop greater understanding of the Company's environmental and social management policy, and improve environmental and social management performance within the Company and among its stakeholders.
- 1.5. The Company shall ensure appropriate and sufficient training related to environmental and social management for its employees on a regular basis, and collaborate with key counterparties and stakeholders to ensure contractors, suppliers or other individuals under the Company's responsibility receive appropriate and sufficient training on relevant issues.
- 1.6. The Company shall incorporate environmental and social issues, including occupational health and safety issues, into its risk management process, and shall strive to develop appropriate risk prevention and mitigation measures including establishing emergency and business continuity plans.
- 1.7. The Company shall establish a procedure to investigate any major incidents related to environmental, social or safety issues in order to determine the cause, identify impacts, develop remediation plans, develop prevention and mitigation plans, and communicate lessons learned throughout the organization for future improvement. The Company's Executive Committee shall have the authority to designate the investigation team, consider the findings of the investigation, and, in the event of wrongdoing, determine the appropriate punishment and/or remediation as required.

- 1.8. The Company shall monitor and review its environmental and social management performance on a regular basis, and report on the performance to the Company's management and Board of Directors at least quarterly, as well as disclose information about the Company's environmental and social management performance to key stakeholders and/or publicly, where appropriate.
2. Environmental management
 - 2.1. The Company shall implement an environmental and social management system (ESMS) which gives importance to environmental responsibility throughout all phases of project development, from planning to operations to decommissioning. The Company shall also strive to extend this responsibility throughout its value chain, to suppliers, contractors, business partners, and customers, as well as to its joint ventures, associates, outsourced or sub-contracted work, and other external stakeholders.
 - 2.2. The Company shall comply with applicable local, national and/or international environmental laws at a minimum, and shall strive to operate in accordance with internationally-accepted standards and regulations for environmental management.
 - 2.3. The Company shall establish clear processes and procedures for environmental management to be implemented within the organization and within its projects, and shall regularly review and revise such processes and procedures at least annually and whenever a major change or event occurs.
 - 2.4. The Company may set environmental performance targets for specific issues or areas of operation, such as waste and/or emissions reduction targets, and shall regularly monitor its environmental performance with the aim of continuous improvement in environmental management.
 - 2.5. The Company shall consider key issues such as biodiversity, waste management, greenhouse gas emissions, air emissions, water management, resource management, and impacts to local communities and/or ecosystems as part of its environmental management.
 - 2.6. The Company shall establish an environmental monitoring committee or shall designate an environmental team to monitor environmental performance and identify any potential environmental issues for the Company or its projects that need to be managed.
 - 2.7. The results of the environmental performance monitoring shall be reported to the Company's management and the Board of Directors on a regular basis, and reported to relevant management or Board committees and external entities as required. The Company's environmental performance may also be disclosed through public channels where appropriate.
 3. Social management
 - 3.1. The Company shall implement an environmental and social management system (ESMS) which gives importance to social responsibility throughout all its business and support activities, at the head office, project sites, and other locations under the Company's management and responsibility. The Company shall also strive to extend this responsibility throughout its value chain, to suppliers, contractors, business partners, and customers, as well as to its joint ventures, associates, outsourced or sub-contracted work, and other external stakeholders, as well as to the local communities around its project sites.

- 3.2. The Company shall consider key issues such as human rights, diversity and non-discrimination, labor rights, occupational health and safety, and community relations as part of its social management.
- 3.3. The Company shall comply with applicable local, national and/or international laws related to occupational health and safety, labor rights, and other social issues at a minimum, and shall strive to operate in accordance with internationally-accepted standards and regulations for occupational health and safety management, human rights, and labor rights.
- 3.4. The Company shall establish clear processes and procedures for occupational health and safety management to be implemented within the organization and within its projects, and shall regularly review and revise such processes and procedures at least annually and whenever a major change or event occurs.
- 3.5. The Company may set social performance targets for specific issues or areas of operation, including a zero accident target in relation to occupational health and safety, and shall regularly monitor its performance with the aim of continuous improvement in social and occupational health and safety management.
- 3.6. The Company shall establish an occupational health and safety committee or shall designate a safety team to monitor occupational health and safety performance and identify any potential safety issues that need to be managed for the Company, its projects, its employees, or other individuals under the Company's responsibility. Prioritization of issues, along with management and action plans, shall be developed in consultation with the Company's employees, contractors, workers, and/or their representatives to ensure key issues are addressed.
- 3.7. The Company shall provide appropriate and sufficient training and capacity-building related to social and occupational health and safety issues for its employees, contractors, and other individuals under the Company's responsibility.
- 3.8. The results of the social and occupational health and safety performance monitoring shall be reported to the Company's management and the Board of Directors on a regular basis, and reported to relevant management or Board committees and external entities as required. The Company's social performance may also be disclosed through public channels where appropriate.

These commitments shall be undertaken within the framework of sustainability and good corporate social responsibility to ensure that the Company continues to create a positive impact in all spheres where it operates.

Contact

Inquiries, suggestions, and complaints related to the Environmental and Social Management Policy may be directed to the Company at sustainability@gulf.co.th.

Violations of the Environmental and Social Management Policy may be reported to the Internal Audit Department at ia@gulf.co.th. The Company's whistleblowing policy shall apply in all cases of reporting.