

Non-Discrimination and Harassment Policy

Principle

Gulf Energy Development Public Company Limited (the "Company") recognizes that human rights are a fundamental component of a sustainable society and should be respected in all aspects of life. As part of its commitment to uphold human rights as well as support strong organizational growth, the Company is committed to building a safe and healthy workplace free from discrimination and harassment.

Objective

This policy sets out the principles and guidelines under which all Company employees and stakeholders should be treated and should treat others in order to develop a strong and sustainable organizational culture, in line with the objectives set out by the Company's human resources policies and strategies, as well as the commitments set out in the Company's Sustainability Policy and the material issues set out in the Company's Sustainability Framework.

Scope

This policy applies to all members of the Gulf Group of Companies (the "Group") including members of the Board of Directors, executive management team and employees. The Company also encourages its business partners, suppliers, contractors, and other counterparties to apply such commitments in their own activities and operations.

Definitions

- Discrimination refers to the unequal and/or unfair treatment of an individual or group based on sex, gender, age, race, ethnicity, religion, nationality, and any other non-merit-based attributes.
- Harassment refers to unwelcome behavior which causes mental, emotional or physical harm to another person.

Oversight

This policy has been approved by the Board of Directors. Revisions of the policy will be advised by the Sustainability, Governance and Risk Management Committee who shall also represent the Board of Directors in providing oversight for the Company's performance in line with this policy.

References

Gulf Sustainability Policy Gulf Sustainability Framework Gulf Human Resources Policies



Policy

Gulf Energy Development Public Company Limited will:

- 1. Provide a workplace free from discrimination based on sex, gender, age, race, ethnicity, religion, nationality, and any other non-merit-based attributes.
- 2. Provide a workplace free from all forms of harassment, both sexual and non-sexual, whether verbal, non-verbal or physical, including online harassment and/or cyberbullying.
- 3. Ensure fair and non-discriminatory compensation, benefits, working conditions, and opportunities for development and advancement for all employees of the Company and companies within the Group.
- 4. Ensure managerial, operational and administrative processes are undertaken without discrimination.
- 5. Put in place measures to prevent discrimination and harassment within the Company's workplaces and/or work processes, including outlining clear policies and codes of conduct, implementing training for all employees, providing a clear grievance mechanism and/ or reporting channels, and conducting regular monitoring of employee well-being.
- 6. Ensure sufficient measures are in place to protect employees' personal information and ensure such information is used or disclosed in a legal and appropriate manner.
- 7. Communicate the Company's Non-Discrimination and Harassment Policy to its internal and external stakeholders, and report on its performance regarding anti-discrimination/ anti-harassment to the management, Board of Directors, and the public as appropriate.

Investigations and disciplinary measures

The Company shall maintain a zero tolerance policy for all forms of discrimination and harassment as described by this policy. Any instances of discrimination and/or harassment within the Company's premises or processes may be reported to a supervisor, the Human Resources Department, or the Internal Audit Department. The Company's whistleblowing policy shall apply in all cases of reporting.

All reports shall be investigated promptly by an independent team and measures implemented to ensure the protection of the privacy and confidentiality of the individual(s) involved. Should the reported instance of discrimination or harassment be verified and confirmed, the Company shall take appropriate disciplinary action against the individual who committed the offense, which may include formal written warnings and requirements to attend anti-discrimination/ anti-harassment training, and may extend to dismissal and/or legal proceedings where appropriate. The Company shall also conduct lessons-learned sessions and regularly review its policies and procedures to enhance the effectiveness of its anti-discrimination and anti-harassment efforts.

Contact

Inquiries, suggestions, and complaints related to the Non-Discrimination and Harassment Policy may be directed to the Company at sustainability@gulf.co.th.