



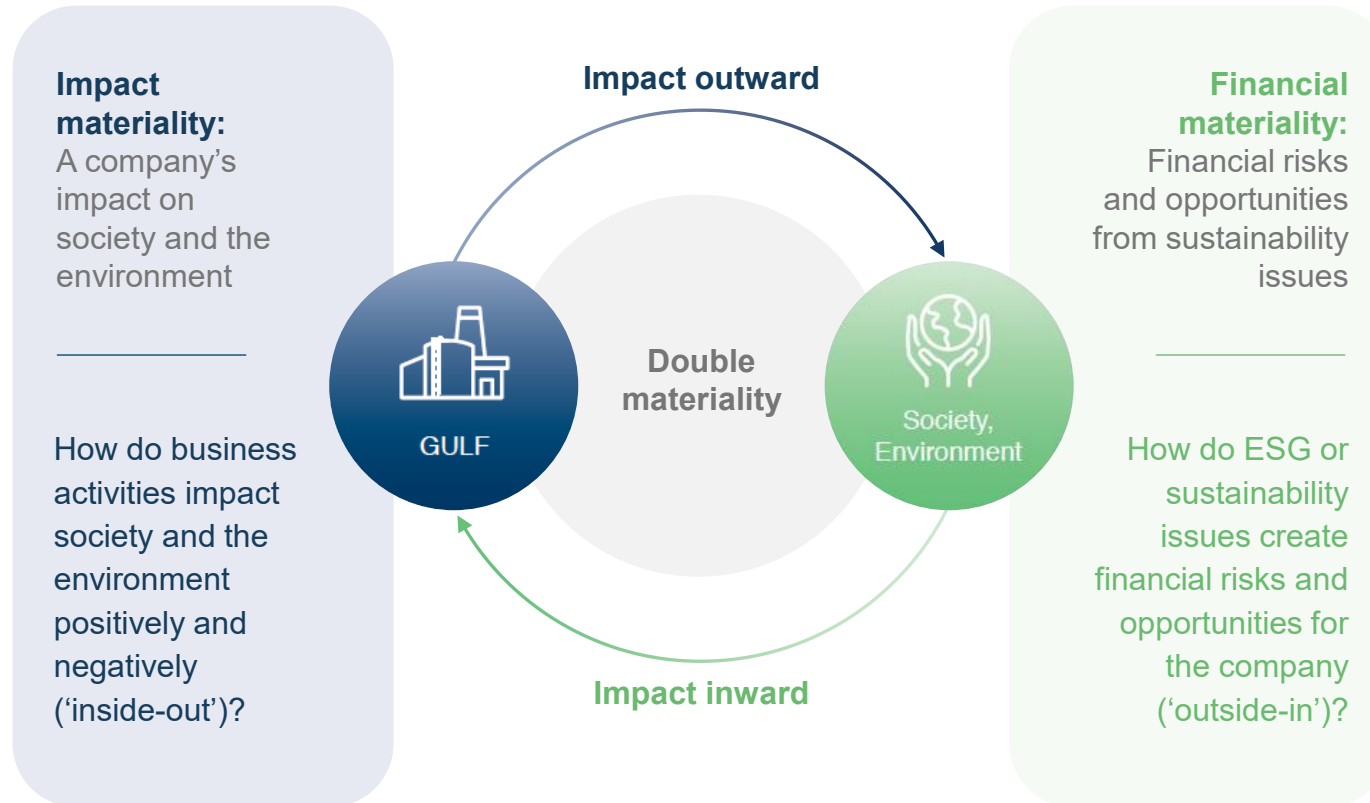
Double Materiality Assessment

2025-26



Double Materiality Assessment: Background and Objectives

A Double Materiality Assessment (**DMA**) is a strategic prioritization tool that identifies topics that are significant both in terms of a company's impact on society and the environment, and the influence of environmental, social and governance (**ESG**) factors on its financial performance.



A robust Double Materiality Assessment (DMA) sits at the core of sustainability management for Gulf Development PCL ("GULF" or "the Company"), ensuring that current priorities are addressed while preparing for future challenges. GULF conducts the assessment on an annual basis. The 2025-26 DMA cycle was conducted with the support of an independent external party to strengthen the rigour and objectivity of the process.

Conducted in alignment with the principles of double materiality as defined by the Global Reporting Initiative (GRI) Standard, the DMA sought to fulfil three primary objectives:

1. Identify the most significant impacts on GULF's enterprise and external stakeholders (whether actual or potential, positive or negative) and the most significant sustainability-related risks and opportunities for the Company; through assessing impacts, risks and opportunities (IRO) of each topic using the Company's enterprise risk management criteria
2. Review global trends, leading practices, and progress of GULF's peers to inform the Company's sustainability priorities; and
3. Prioritise material topics to guide proactive management and monitoring.

The assessment findings are reviewed and endorsed by the Sustainability, Governance and Risk Management Committee (SGRC), a sub-committee of the Board of Directors.

By identifying material topics using an evidence-based approach, the DMA enables GULF to:

- Respond directly to stakeholder priorities and expectations
- Focus resources on the areas of greatest materiality
- Establish a foundation for measurable outcomes and clearer accountability
- Align sustainability priorities with business strategy and risk management
- Deliver decision-useful information to investors and other stakeholders

GULF's DMA was carried out through four key phases aligned with guidance from international standards such as GRI Standards



Phases 1 (Scope Refinement) and 2 (Impacts, Risks, and Opportunities Identification)



01 | Scope Refinement

1.1 Define the scope through value chain mapping

GULF developed a value chain mapping of its business to identify key operational activities and their associated stakeholders within the scope, focusing on the **Energy** and **Digital** business units for the assessment in 2025-2026.

1.2 Identify potential sustainability matters:

GULF identified potential sustainability matters relevant to its business and industry through a review of multiple sources internally and externally, including:

External

Reviewing peer disclosures, leading sustainability standards (e.g., GRI), industry trends, regulatory developments, and value chain considerations.

Internal

Reviewing GULF's business strategy initiatives, internal reports, business functions, and other-specific insights to identify issues that may have been overlooked through the top-down.

1.3 Results consolidation

Consolidated a universe of more than 50 potentially relevant sustainability matters and applied predefined thresholds and selection criteria to refine these into a shortlist of 17 material topics for the DMA.

02 | Impacts, Risks and Opportunities Identification

2.1 Stakeholder engagement

GULF engaged with 12 key stakeholder groups both internal and external stakeholders to provide insights and validate **'outside-in'** risks and opportunities and **'inside-out'** impacts to support the IRO identification and assessment process to ensure the comprehensiveness of the assessment.

Groups of identified stakeholders

Internal Stakeholders

- Employees
- Top management
- Board of Directors

External Stakeholders

- Customer
- Supplier
- Regulator
- Investor
- Business partners
- Lender
- Community
- Media
- Civil society

Engagement approach

The survey was intended to assess stakeholders' perceptions of the level of impact associated with each identified material topic, while interviews were conducted to gather deeper qualitative insights into relevant sustainability matters.

Sample size and Response rates:

Calibrated based on the no. of stakeholders in each group. Sample size represents 40% of total population with a 51% response rate

500+ SURVEY RESPONSES

20 INTERVIEW SESSIONS

Employees

Suppliers

Energy Business Customer

Digital Business Customer

Across groups of stakeholders

02 | Impacts, Risks and Opportunities Identification

2.2 IRO Identification

Following the stakeholder engagement process and identification of relevant sustainability matters, GULF consolidated the findings through an **Impact, Risk, and Opportunity (IRO) identification process** to determine the materiality of each sustainability matter from both **impact materiality** and **financial materiality** perspectives.

1) Impacts Identification: Each identified impact was identified based on:

- **Business activities** – identifying actual and potential impacts associated with GULF’s business activities, operations, and value chain, including activities where GULF may cause, contribute to, or be directly linked to impacts.
- **Outcomes** – evaluating the consequences of GULF’s activities on people and the environment, including positive and negative effects related to Environmental, Social, and Governance (ESG) topics.
- **Impact type** – determining whether the impact is an actual impact (already occurring) or a potential impact (may occur in the future).
- **Time horizon** – assessing the timeframe over which the impact may materialize, including short-, medium-, and long-term implications.

2) Risk and Opportunity identification: The identification of ROs was informed by multiple inputs, including:

- **Existing R&Os** – reviewing GULF’s existing risk framework, business plans, operational data, and strategic considerations to identify sustainability-related risks and opportunities that may affect GULF’s financial position.
 - Peer analysis and benchmarking – identifying sustainability-related risks and opportunities disclosed by industry peers to identify common themes, emerging issues, and sector-specific considerations
 - Market and industry trends – reviewing external developments, emerging sustainability trends, regulatory expectations, and sector-specific challenges
 - Stakeholder engagement insights – incorporating stakeholder perspectives to identify expectations that may influencing to GULF’s business operations
- **Outcomes** – evaluating the potential implications of identified R&O on GULF’s business activities, financial performance, strategic objectives, and ability to create long-term value.
- **Financial implications** – identifying whether the R&O occurred to impacts the financial status of the company

Phases 3 (Assessment and Prioritization) and 4 (Review and Reporting)



03 | Assessment and Prioritization

After the identification of **impacts** (i.e., external impacts on society and the environment) and **risks and opportunities** (i.e., internal impacts of the business), **GULF assessed these IROs across short-, medium-, and long-term horizons**, applying criteria aligned with the Company's enterprise risk management.

Define Assessment Criteria

The assessment involved both **qualitative** and **quantitative** inputs from internal experts and topic specialists across GULF's business units, using the Company's existing risk matrix.

Score	Magnitude (Risk)	Magnitude (Opportunity)	Likelihood	Media exposure (reputation proxy)
1	Less likely to be less than 1% of EBT and FX • No disadvantage to asset/liability with no business interruption and no delay to project timeline • No meaningful operational, financial, regulatory effects	Financial gain likely to be less than 1% of EBT and FX • Marginal financial or strategic benefit • No meaningful improvement to performance	Not expected to occur and very unlikely to materialize	No media coverage
2	Less likely to be 1% to 5% of EBT and FX • Minor disadvantage to asset/liability OR short-term business interruption at one site OR delay without impact to completion date for one project • Small impact with limited financial loss	Financial gain likely to be 1% to 5% of EBT and FX • Minor cost savings or revenue gain • Limited, short-term reputational benefits • Small improvement in efficiency	Unlikely but possible; less frequent	Limited to moderate coverage by local media with no national/international or social media coverage
3	Less likely to be 5% to 10% of EBT and FX • Moderate disadvantage to asset/liability OR short-term business interruption at multiple locations OR delay without impact to completion date for multiple projects or delayed completion of one project • Moderate reputational impact, medium-term coverage	Financial gain likely to be 5% to 10% of EBT and FX • Meaningful financial benefits (e.g., in EBITDA), efficiency, strategic, or resilience improvement • Moderate reputational improvement (medium-term)	Possible under certain conditions or circumstances; reasonably expected and moderate probability	Extensive coverage by local media and/or limited to moderate coverage by national media AND limited international or social media coverage
4	Less likely to be 10% to 20% of EBT and FX • Significant disadvantage to asset/liability OR extended business interruption at multiple locations OR significant impact to completion date for multiple projects or delayed completion of one project • Significant reputational impact, medium-term coverage	Financial gain likely to be 10% to 20% of EBT and FX • Significant growth, efficiency, or strategic advantage • Major reputational improvement to company • Significant reputational improvement to company	Likely to occur with some timing and/or scope uncertainty	Moderate national and/or international coverage AND limited to moderate social media coverage
5	Less likely to be equal to or more than 20% of EBT and FX • Severe disadvantage to asset/liability OR extended business interruption at multiple sites OR inability to complete project • Severe reputational damage with long-term impact and international attention	Financial gain likely to be equal to or more than 20% of EBT and FX • Transformational business or market positioning, direct operational, and operational benefits • Factor EBT savings and strategic ratings from analysts • Significant, long-term reputational benefit	Almost certain / recurring / already occurring • Potentially with a >50% probability of occurring	Extensive coverage by national and/or international media AND moderate to extensive social media coverage

Impact Assessment

Severity

- Scale, Scope
- Irremediability (if negative)

Likelihood

R&O Assessment

Magnitude and Likelihood of potential financial effects

Upon receipt of the assessment results from various parties, a workshop was then held to reconcile and harmonize some of the divergent views received. This workshop was attended by key members of departments at the working-group level in charge of overseeing risks, financial matters, and sustainability-related matters for the organization.

After the assessment, the IROs were prioritized based on the thresholds set for both impact and financial materiality. By doing so, the assessment criteria can be considered using GULF's existing criteria

04 | Review and Reporting

Engage sustainability experts and senior management to obtain to obtain independent perspectives on the materiality assessment results, validate the relevance and significance of identified material topics, and gather broader insights into emerging sustainability trends, industry developments, and key sustainability matters relevant to the Company and its sector.

Reporting

Map and identify relevant disclosure requirements for each material topic : reviewing applicable requirements under relevant sustainability standards (i.e. GRI) together with other relevant sustainability reporting guideline to determine the key disclosures and data points required for reporting.

This process will support the alignment of the Company's sustainability disclosures with applicable reporting requirements and ensure that relevant information is appropriately identified for subsequent data collection and reporting.



Double Materiality Assessment Results



Materiality Results

The consolidated assessment results, visualised in the final materiality matrix, were presented to third-party subject-matter experts and to the Sustainability, Governance and Risk Management Committee (SGRC). This step ensured the completeness, accuracy, and credibility of the double materiality assessment before formal sign-off.

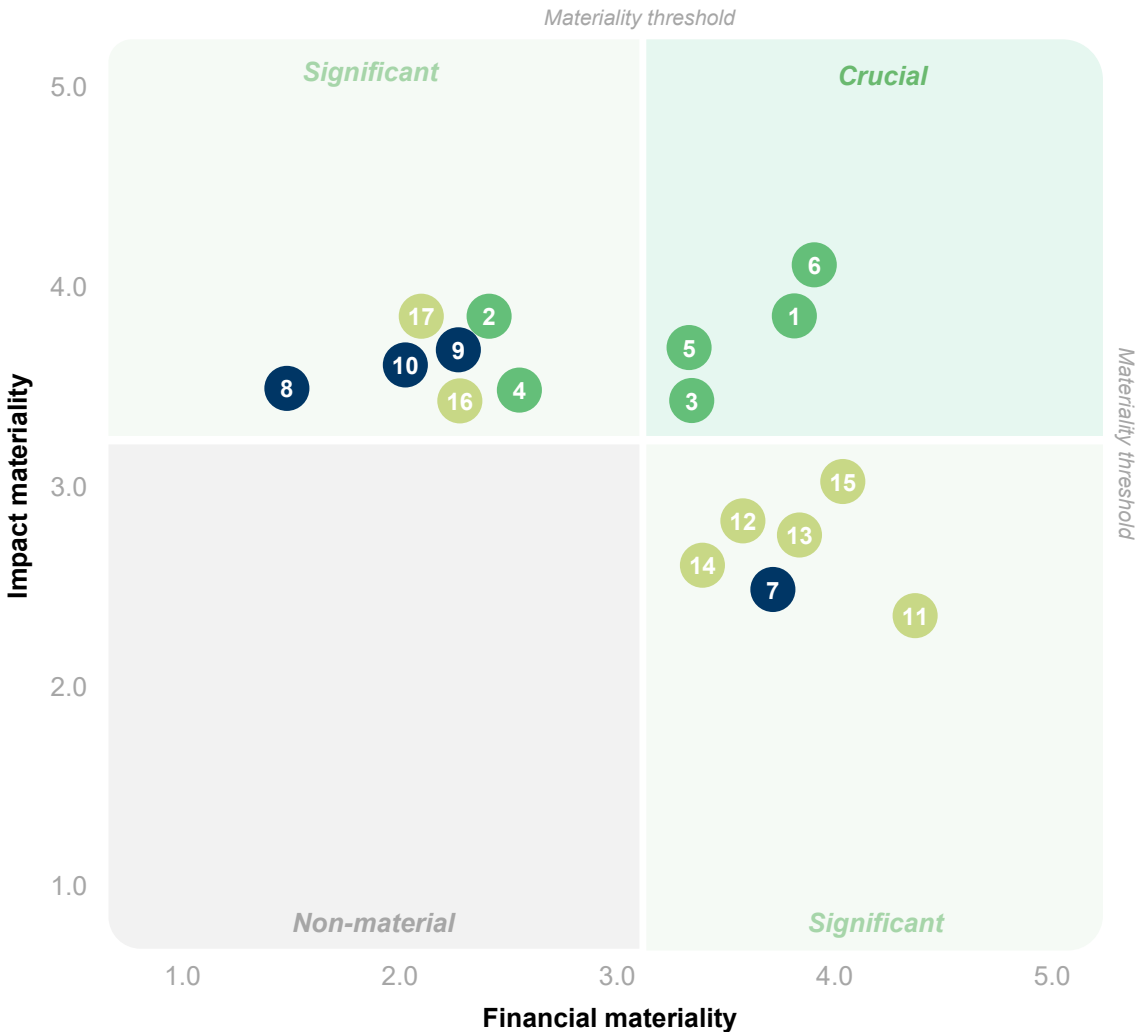
Following endorsement by the SGRC, the final DMA results and process were presented to GULF's executives and approved by the Board of Directors.

Material topics are later integrated in the Company's enterprise risk management assessment process in identifying and assessing corporate risk factors.

The 2025-26 DMA results are disclosed in alignment with international standards through GULF's dedicated sustainability website.

Further details on the DMA process, results, and the management approach for each material topic, in line with GRI 3-3 ('Management of material topics'), will be presented in GULF's 2026 Sustainability Report.

ENVIRONMENT	
1	GHG Emissions
2	Air Emissions
3	Water Management
4	Waste Management
5	Biodiversity
6	Climate Strategy
SOCIAL	
7	Human Capital Management and Development
8	Occupational Health and Safety
9	Community and Social Development
10	Human Rights
GOVERNANCE	
11	Supply Chain Management
12	Corporate Governance and Anti-Corruption
13	Information Security and Cybersecurity
14	Customer Experience
15	Digitalization and Innovation
16	Business Resilience
17	Sustainable Finance





Approaches to Materiality Topics

The most crucially material topics affect GULF's value creation through identifiable drivers



Material topic	Value creation and its materiality to GULF	Impact and value drivers	Business strategy and management approach
Climate Strategy	- Investment and expansion of renewable energy portfolio - Expansion of gas-fired portfolio (as a transition fuel), aligned with the Nationally Determined Contributions (NDCs) - Opportunity to align sustainability disclosures with upcoming regulation (e.g., IFRS)	- Revenue growth - Continued competitive advantage - Access to green finance opportunities through renewables - Increased capital expenditures, allocation, and operating costs for portfolio expansion	GULF has established an overall sustainability strategy and framework across climate adaptation and mitigation, based around 4 key pillars: Technology-driven Decarbonization, Responsible Value Chains, Just Energy Transition, and Sustainable Financing. These are supported by several ESG enablers. As part of this strategy, GULF's approach involves expansion of renewable capacity, defining a time-bound transition pathway, as well as undertaking climate scenario analyses and aligning financing and disclosure.
GHG Emissions	- Transition risk (long-term): Thailand's updated NDC and National Adaptation Plan (NAP) accelerate national decarbonization timelines, impacting LNG, gas-fired power and data center operations - Carbon-intensive operations expose GULF to future regulation, carbon costs, financing expectations and customer demand for lower-carbon energy	- Increased operating and compliance costs to adhere to regulations - Potential asset impairments or reduced future cashflow if misaligned with national targets - Opportunity to transition to renewable energy	GULF's net-zero and decarbonization pathway is driven by three key approaches to reduce total emissions and emissions intensity: 1) expanding low-carbon generation primarily through renewable energy, 2) decarbonizing its gas fleet through efficiency improvements, fuel switching and emerging technologies, and 3) potentially neutralizing the remaining hard-to-abate emissions through high-quality carbon removals. This is all supplemented by strengthening Scope 1–3 monitoring.
Biodiversity	- Leveraging existing assets and business synergies to support ongoing biodiversity monitoring and management across operations - Biodiversity is a key area in project financing and success	- Reduced risk of biodiversity related fines, penalties, or project delays / interruptions - Reduced monitoring costs - Improved reputation - Increased access to financing	GULF has established a Biodiversity Policy, outlining a Biodiversity Management Framework which addresses direct and indirect drivers of biodiversity and ecosystem change and is used throughout the project lifespan. GULF also conducts comprehensive biodiversity assessments across all project locations and ensures ecological stewardship is embedded in its processes. In addition, GULF also conducts several biodiversity initiatives, such as workshops or awareness campaigns.
Water Management	- Opportunities to optimize or adopt technologies that reduce water usage and consumption - Water management is a key area in project financing and success	- Improved social license to operate, especially as water scarcity leads to more impacts - Improved margins due to cost reduction and optimization - Long-term operational resilience	GULF ensures that water is managed responsibly across all project sites through sustainable water stewardship, continuously minimizing risks, protecting water sources and monitoring water performance. Its water management approach has 4 key steps: (1) assessment of water-related risks, (2) water management planning, (3) water treatment, and (4) reduction of water consumption levels.
Community and Social Development	- Constructive community relationships support GULF's value creation and local license to operate - Engagement and development programs can strengthen trust and shared benefits	- Opportunity in local capability, service access and durable community partnerships - Potential risks if lack of communication resulting in project delays	Stakeholder engagement, EIA-linked consultation, local coordination, grievance channels and the GULF IMPACT framework to ensure meaningful stakeholder engagement and value creation in communities

GULF manages its most financially material topics through defined metrics and targets



Material topic	Target or Metric	Target Year	Latest Progress	Executive Compensation
Climate Strategy GHG Emissions	- Reduce Scope 1 emissions intensity by 25% by 2030 (base year 2019) 40% of total gross installed capacity to be renewables by 2035; Net-zero scope 1 and 2 GHG emissions by 2050	2030 2035, 2050	- Scope 1 emissions intensity decreased from 0.343 tCO₂e/MWh to 0.340 tCO₂e/MWh in 2025. 14% gross installed renewable capacity in 2025. 40% (9.85 GW) already committed in gross installed renewable capacity, coming online by 2033.	Executive compensation is linked to the achievement of GULF's business strategy.
Biodiversity	- No net negative impacts on biodiversity - No net loss of species in areas with business activities - Zero business activities in areas with IUCN Red List Species	Annual (targets are to be achieved every year)	- As of 2025 100% of sites assessed for biodiversity impacts - No net loss of species in areas with business activities - No business activities in areas with IUCN Red List Species	
Water Management	Maintain water intensity below 1.00 m³/MWh	Annual (targets are to be achieved every year)	- Maintained its water intensity level at 0.75 m³/MWh in 2025 (25.74% reduction from 2019). - In addition, GULF reduced its total water consumption to 27.17 million m³ in 2025 (5.43% decrease from the previous year).	
Community and Social Development	- Number of contribution to social investments - Total number of beneficiaries (people and communities) - Number of employee volunteer and volunteer hours	Annual (targets are to be achieved every year)	- More than THB 500 million invested over five years - More than 1 million beneficiaries, over 3,500 communities, 40 provinces and 60 projects. - Over 780 employees, or 39% of employees, contributed 464 volunteer hours, a 42% increase in volunteer participation and effort.	

GULF's operations and value chain create significant impacts on external stakeholders (1/2)



Material topic	Key material impacts to external stakeholders	Cause / coverage	Impacted external stakeholders	Output metric	Impact valuation / metrics
Climate Strategy	- Capital allocation decisions influences on the development of Thailand's energy mix and infrastructure landscape - Supports Thailand's low carbon energy transition and security	- Own operations - Across all business segments	- Nature and environment - Communities - Society (Media/Civil society) - Business partners and suppliers - Customers - Regulators - Investors and Lenders	2.2 GW solar PV capacity 9.9 GW committed gross renewables capacity by 2033 40% committed gross renewables share 1.38 mil. MWh renewable energy generated	- Avoided emissions from current and increasing renewable energy capacity - Approximately 1.35 million tCO₂e avoid from solar PV projects - Social cost avoided from reducing emissions, which can potentially reduce healthcare expenditure
GHG Emissions	- Increased Scope 1-3 emissions, contributing to climate change - Continuous electricity demand from data centers, increasing emissions - Implementing operational efficiency reduces total and residual emissions - Renewables contribute to lower GHG emissions compared to fossil fuels which can reduce GHG and air emissions providing social and environmental benefits	- Own operations and across all value chain activities - Across all business segments	- Nature and environment - Communities - Society (Media/Civil society) - Business partners and suppliers - Customers - Regulators - Investors and Lenders	100% of projects assessed for carbon footprint 15.8 million tCO₂e Scope 1-3 GHG emissions 0.34 tCO₂e/MWh Scope 1 emissions intensity 62M MWh consumed	- Avoided emissions from current and increasing renewable energy capacity - Approximately 1.35 million tCO₂e avoid from solar PV projects - Emissions abatement through investing in carbon capture, utilization, and storage to mitigate cost of emissions

GULF's operations and value chain create significant impacts on external stakeholders (2/2)



Material topic	Key material impacts to external stakeholders	Cause / coverage	Impacted external stakeholders	Output metric	Impact valuation / metrics
Biodiversity	Development of projects and facilities altering and restoring existing natural habitats to avoid or reduce adverse ecosystem impacts	- Own operations and upstream activities - Across all business segments	- Nature and environment - Communities - Business partners and suppliers - Regulators - Investors and lenders	0 sites with significant biodiversity impacts - No net loss of species in areas with operations - No business activities in areas with IUCN Red List Species	0 habitat-condition change as a result of maintained no-net loss result - No impact to species abundance on sites subjected to assessments
Water Management	Water availability and quality meet standards and do not impact environmental and local communities	- Own operations and upstream activities - Across energy businesses	- Nature and environment - Communities - Business partners and suppliers - Regulators	- Water intensity 0.75 m³/MWh - Total water consumption - Water effluents passed industrial standards - Discharged water 5.70 million m³	Water efficiency and quality standards passed across operations reducing impacts on community and ecosystems
Community and Social Development	Core operations and projects can affect livelihoods, access to services and local environments; engagement and well-designed programs can create community benefits	- Own operations and across all value chain activities - Across all business segments	- Communities - Customers	- People with improved service access; - Grievances resolved - Beneficiaries of core-business programs	- Over 1 million people have access to education on modernized farming, healthcare improving quality of life - Over THB 750,000 raised income across households in communities

GULF's material topics support a broad set of SDGs, reflecting the wide-ranging sustainability impact of its business



	MATERIAL TOPICS	SUB-TOPICS COVERAGE	KEY SDG CONTRIBUTIONS
ENVIRONMENT	1 GHG Emissions	Climate change mitigation; GHG emissions; Energy; Renewable energy; Energy efficiency and carbon reduction; Carbon markets	7 CLEAN ENERGY, 11 SUSTAINABLE CITIES, 13 CLIMATE ACTION
	2 Air Emissions	Other air emissions not under GHG emissions; Air pollution (NOx, SOx, PM)	3 GOOD HEALTH, 11 SUSTAINABLE CITIES, 13 CLIMATE ACTION
	3 Water Management	Water management/use; Water stress; Water and effluents; Recycled water, reused water, water discharge, effluents, wastewater	6 CLEAN WATER, 12 RESPONSIBLE CONSUMPTION, 14 LIFE BELOW WATER
	4 Waste Management	Waste management and reduction; Circular economy practices; Landfilling and incineration; Waste removal	11 SUSTAINABLE CITIES, 12 RESPONSIBLE CONSUMPTION, 14 LIFE BELOW WATER
	5 Biodiversity	Biodiversity and ecosystem protection; Biodiversity impacts; IUCN Red List species; Resource use	6 CLEAN WATER, 15 LIFE ON LAND, 14 LIFE BELOW WATER
	6 Climate Strategy	Climate change adaptation; Climate risks and opportunities; Environmental policy and certification; Overall climate strategy	7 CLEAN ENERGY, 9 INDUSTRY, INNOVATION, 13 CLIMATE ACTION
SOCIAL	7 Human Capital Mgt. & Dev.	DEI; Own workforce; Training and development; Rewards and compensation; Labor rights; Employment culture; Value chain workers	4 QUALITY EDUCATION, 8 DECENT WORK, 6 GENDER EQUALITY
	8 Occupational Health & Safety	OHS; Hazards; Safety training; Workplace safety	3 GOOD HEALTH, 8 DECENT WORK
	9 Community and Social Dev.	Social impact; Community development; Economic vitality of communities; Public welfare and social contribution; Economic distribution and contribution; Local employment generation	1 NO POVERTY, 2 ZERO HUNGER, 10 REDUCED INEQUALITIES
	10 Human Rights	Forced/child labor; Freedom of association/collective bargaining; Indigenous rights; Integration of human rights principles into value chain	6 GENDER EQUALITY, 8 DECENT WORK, 10 REDUCED INEQUALITIES
GOVERNANCE	11 Supply Chain Management	Sustainable and responsible supply chains; Sustainable purchasing/procurement; Economic vitality of supply chain; Supplier due diligence and codes of conduct; Supplier environmental and social assessment; Local suppliers, Supply chain risks	12 RESPONSIBLE CONSUMPTION, 8 DECENT WORK, 17 PARTNERSHIP FOR GOALS
	12 Corp. Gov. & Anti-Corruption	Business ethics and business conduct; Transparency; Anti-corruption and bribery; Political engagement and lobbying activities; Responsible business and financial performance; Anti-competitive behavior (anti-trust or monopoly practices)	16 PEACE, JUSTICE, STRONG INST.
	13 Info. Security & Cybersecurity	Cybersecurity management; Data privacy protection; Information security; Cybersecurity training and certifications; Cybersecurity threat assessment; Cybersecurity incidents	9 INDUSTRY, INNOVATION
	14 Customer Experience	Customers and end-users; Customer experience and satisfaction; Product and service quality; Reliable energy and fair tariffs; Transparency in marketing and labelling of services	12 RESPONSIBLE CONSUMPTION
	15 Digitalization and Innovation	Digitalization and digital transformation (for GULF and for society); Process improvement and innovation; Digital efficiency	8 DECENT WORK
	16 Business Resilience	Compliance and Risk management; Business resilience and continuity (to ensure long-term operational stability)	11 SUSTAINABLE CITIES, 13 CLIMATE ACTION
	17 Sustainable Finance	Activities to integrate ESG considerations in financial and investment decisions; Engagement with sustainable finance mechanisms (e.g., green/sustainability-linked financial instruments, sustainability focused investors/financial institutions)	17 PARTNERSHIP FOR GOALS, 13 CLIMATE ACTION, 9 INDUSTRY, INNOVATION

GULF DEVELOPMENT PCL
DOUBLE MATERIALITY ASSESSMENT 2025-26

Risk and Crisis Management

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Risk Management Framework



The Company applies an enterprise risk management framework aligned with the COSO Enterprise Risk Management framework, comprising four interconnected components: structure, process, infrastructure and culture. The framework involves the Board of Directors, management and employees across the organization, supports strategy setting and decision-making, and is designed to identify, assess and manage risks that may affect the achievement of the Company's objectives, in line with its approved Risk Appetite.

The framework is established through the Board-approved Risk Management Policy and supported by the Risk Management and Business Continuity Management Manual. Drawing on COSO ERM principles, these documents establish the principles, governance arrangements and methodologies for identifying, assessing, managing, monitoring and reporting risk and crisis management.

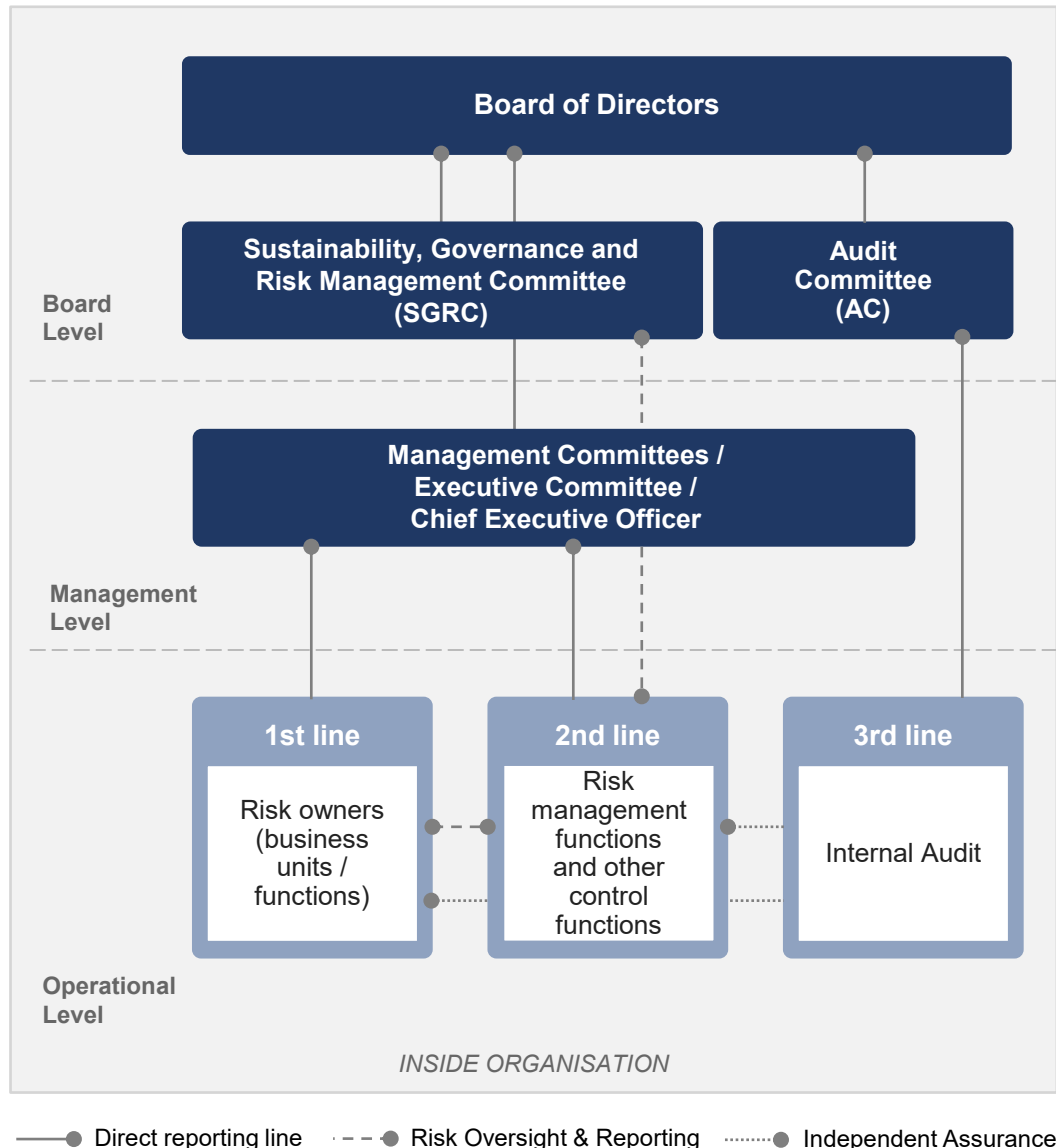
The purpose of risk management is to manage risks within acceptable levels in support of the Company's objectives, while maintaining an appropriate balance between growth, risk, and return. To remain relevant to the Company's evolving business and operating environment, the Policy and Manual are reviewed at least annually and updated when significant changes occur.

Components of the risk management framework

Structure	Process	Infrastructure	Culture
Clearly defined roles across the Board, its committees, management and all employees.	A structured, six-step risk management cycle applied on a continuous basis.	Supporting methodologies and tools, together with the risk register and the risk map.	A shared awareness of risk, an appropriate tone at the top, and a Board-approved risk appetite.

Risk Governance Structure

Risk is overseen at Board level and managed across three lines of defense and at every level of the organization.



Board-level oversight

- **The Board of Directors** approves the risk management policy and risk appetite, and monitors the corporate risk profile.
- **The Sustainability, Governance and Risk Management Committee**, Chaired by an independent director
 - Endorses risk management policy, manual, strategy, resources, and risk appetite for Board approval
 - Oversees and reviews the effectiveness of risk management processes
 - Reviews risk assessments and mitigation plans
- **The Audit Committee**, comprising independent directors, provides independent assurance over internal controls and risk management.

Management-level oversight

Senior executives are responsible for setting strategic direction and objectives, reviewing risk assessments, evaluating risk management performance and progress, and determining enterprise-level risk mitigation measures.

Three lines of defense

- | | |
|-----------------|--|
| The first line | Business units and supporting functions own and manage day-to-day risks. |
| The second line | <ul style="list-style-type: none">• Comprises risk management and other control functions including safety, information security and compliance• Monitors key risks across the organization and ensures suitable management plans are implemented• Promotes the risk management policy and oversees compliance with the Risk Management Manual throughout the organization |
| The third line | Internal Audit provides independent assurance to the Audit Committee. |

Risk Management Assurance



The Company's risk management process is subject to both independent internal assurance and independent external assurance.

Independent internal assurance

The Company obtains independent internal assurance over the effectiveness of its risk management and internal control systems through the Internal Audit function, which reports to the Audit Committee (AC). Risk management processes are reviewed through the internal audit program at least annually, and audit findings, together with the status of corrective actions, are reported periodically to the AC until all actions are completed.

Independent external assurance

The Company obtains independent external assurance over certain risk management processes that form part of and are aligned with its Enterprise Risk Management (ERM) framework. In particular, the Company maintains certification to ISO/IEC 27001 Information Security Management System (ISMS), under which information security risks are systematically identified, assessed, treated, monitored, and reviewed. Compliance with ISO/IEC 27001 requirements is assessed by an accredited external certification body through annual surveillance audits and recertification audits every three years. This certification provides independent third-party assurance over the effectiveness of the Company's information security risk management process within its broader ERM Framework.

Risk Management Process

The Company's risk management process is structured as a continuous, **six-step cycle** based on the COSO Enterprise Risk Management (ERM) framework.



1. **Objective Setting:** Define objectives aligned with the Company's strategy, risk management framework, and risk appetite.
2. **Risk Identification:** Identify events or risks that may affect the achievement of objectives.
3. **Risk Assessment:** Assess risks by considering likelihood of occurrence and potential impact on the Company.
4. **Risk Response:** Evaluate and prepare appropriate risk responses, including risk acceptance, reduction, avoidance, and transfer.
5. **Control Activities:** Implement preventive, detective, or corrective controls to manage and respond to risks.
6. **Monitoring and Reporting:** Monitor action plans, assess the effectiveness of risk controls, and identify emerging risks.

Risk exposure is reviewed on a regular basis: the corporate risk assessment is reported to the Sustainability, Governance and Risk Management Committee at least twice a year, typically on a quarterly basis, and the corporate risk profile is reported to the Board of Directors at least once a year.

(1) Objective Setting

- Objectives must be established before risks that could impede their achievement can be identified.
- Objectives shall be set at the business unit level and primary business process levels, aligned with the Company's corporate objectives, strategies and risk appetite.

(2) Risk Identification

- A process by which management and employees identify events or conditions that can impact an agreed objective.
- Events with negative impact represent risks, requiring assessment and response; events with positive impact represent opportunities.
- Identification considers internal and external factors, with risks grouped into four categories;

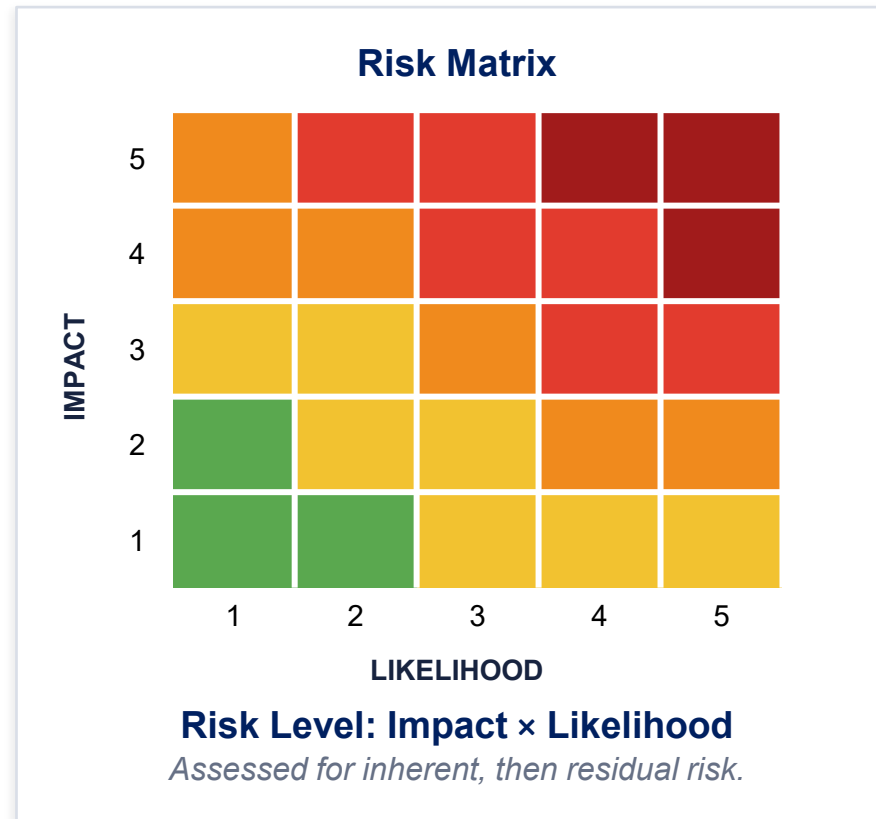
Four Risk Categories

Strategic	External factors or sub-optimal business strategy
Financial	Credit, liquidity and market risk exposures
Operational	Failures in design or implementation of process, structure or system
Compliance	Failure to comply with relevant laws and regulations and internal policies and procedures

Risk Management Process (Cont.)

(3) Risk Assessment

After objective setting, every identified risk is assessed against defined impact and likelihood criteria on a scale of 1 - 5 and plotted on the risk matrix to determine its risk level. The assessed risk level is then compared against the Company's approved risk appetite to determine whether the exposure is acceptable.

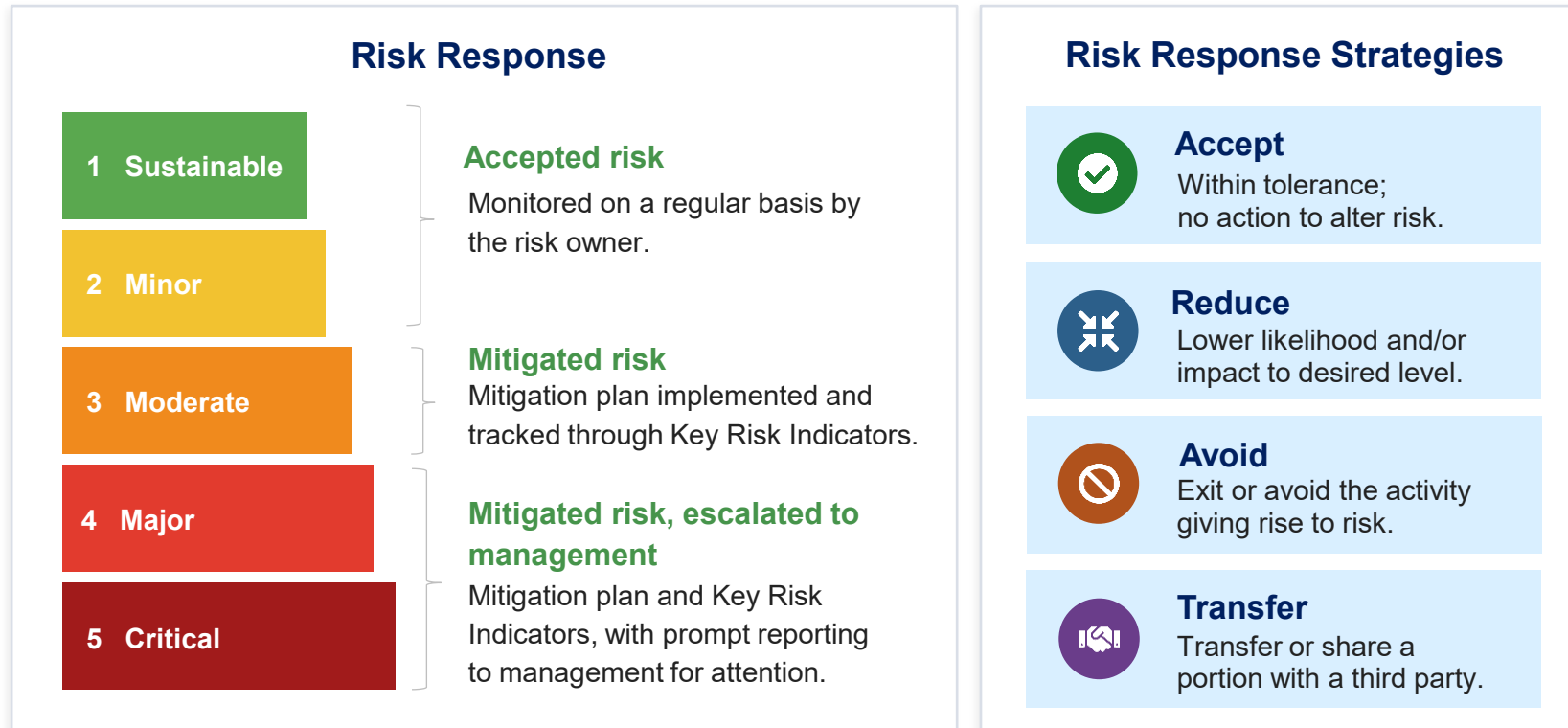


Risk Management Process (Cont.)

(4) Risk Response

Based on this assessment, the risk owner selects the appropriate risk response (Accept, Reduce, Avoid or Transfer). Where the assessed risk exceeds the acceptable level, additional controls or mitigation actions are established and the risk is reassessed on a residual basis. Residual risks that remain above the approved risk appetite are escalated to the appropriate management or committee for further consideration.

The risk appetite is established by management and approved by the Board as part of the strategy-setting process. It provides the basis for determining the level of risk the Company is prepared to accept in pursuit of its objectives.



Risk Management Process (Cont.)

(5) Control Activities

Control activities are the policies and procedures established to ensure that risk responses are effectively carried out. GULF applies three types of controls: **preventive** controls, which act before an event occurs; **detective** controls, which identify issues promptly; and **corrective** controls, which limit or remediate the consequences after an incident.

Control effectiveness testing evaluates each control in terms of its **design effectiveness** and **operating effectiveness**. The purpose is to determine whether the controls are appropriately designed and operating as intended to reduce the likelihood and/or impact of the inherent risk to an acceptable residual risk level. Where controls are assessed as insufficient or ineffective, an action plan is established to strengthen the control environment and further manage the risk.

Control types



Preventive

Segregation of duties, access controls, training



Detective

Reconciliations, confirmations, error reports



Corrective

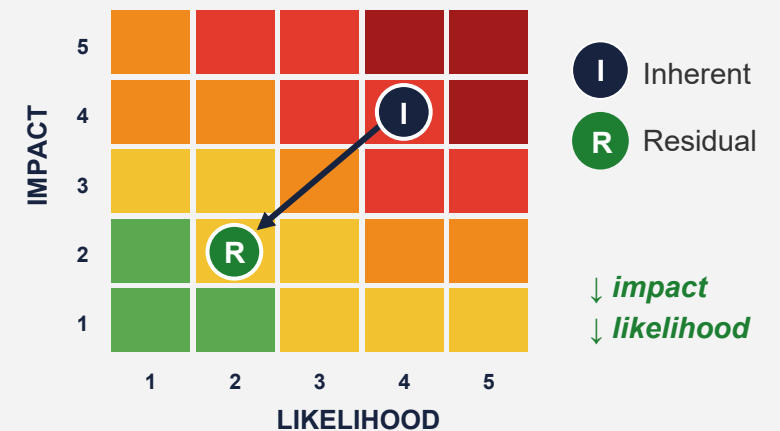
Business continuity and disaster recovery plans

Control Effectiveness Testing

		Design Effectiveness		
		Effective	Partially-effective	Ineffective
Operating Effectiveness	Partially-Effective			
	Partially-effective			
	Ineffective			

Do controls reduce the risk?

Effective controls lower both impact and likelihood, moving inherent risk to an acceptable residual level.



(6) Monitoring and Reporting

Monitoring and reporting is the sixth and final step of GULF's continuous risk management cycle, providing the mechanisms for following, understanding and adjusting the Company's response to risk. Monitoring is carried out both through real-time activities built into normal, ongoing operations and through separate, standalone evaluations, and is reinforced through the **four practices** below.

1. Monitoring objectives and activities

Monitoring evaluates whether action plans for managing risks are followed through and assesses the ongoing effectiveness of control activities, while identifying new risks as the business and its environment change. Carried out mainly by Company personnel, through management oversight, risk review sessions, Key Performance Indicator (KPI) tracking and control self-assessments, supplemented where useful by external providers.

2. Communication and escalation

Proactive and frequent communication is encouraged through formal channels, including regular management meetings, team meetings, regular management reports and meetings of the Sustainability, Governance and Risk Management Committee. Critical risks and incidents are escalated and dealt with immediately, often by direct conversation rather than waiting for a formal reporting period, so that the right risk-related information reaches decision-makers in time to act.

3. Reporting principles and cadence

Reporting is timely, concise and structured to support effective monitoring and decision-making. Material risks, changes in risk exposure and the status of mitigation actions are reported to Management on a regular basis. The corporate risk assessment is reported to the Sustainability, Governance and Risk Management Committee at least twice a year, typically each quarter, while the corporate risk profile is reported to the Board of Directors at least once a year. Critical risks and significant changes are escalated promptly outside the normal reporting cycle where necessary.

4. Risk register and risk map

Risk registers and risk maps provide the core information used for ongoing monitoring and reporting, enabling changes in exposure, mitigation progress and control effectiveness to be tracked consistently across the organization.

Key and Emerging Risks

Name	Geopolitical Fragmentation of Cross-Border Energy Technology and Supply Chains	Impact	4
Category	Strategic - Geopolitical	Risk Level	
Description	Mitigation and Response		
GULF identified emerging risks in trade restrictions, technology controls, localization policies and sustainable-finance requirements. Although these measures exist individually, their simultaneous application across markets represents a new external risk that has not yet materialized as a significant constraint but could intensify. Geopolitical fragmentation of the global energy transition refers to clean-energy markets becoming increasingly divided into national or regional systems with different technology requirements, supply chains, industrial policies and financing frameworks. Although tariffs, export controls and localization requirements are established risks, their increasing convergence across technology access, supply chains, industrial policy and sustainable-finance frameworks represents an emerging structural shift. Over a 5-year horizon, this fragmentation could restrict cross-border access to technologies, suppliers, capital and international partnerships. If it intensifies, energy companies may need to reconsider technology choices, sourcing networks, financing structures, geographic investment allocation and decarbonization pathways, representing a strategic adjustment rather than solely an operational disruption.	To manage the potential impacts of this emerging risk, GULF is strengthening its forward-looking, cross-functional approach by integrating risk monitoring and assessment into investment, project-development and portfolio decisions. Key mitigation and response measures include: Strategic Foresight and Early-Warning Monitoring • Monitor geopolitical, trade, sanctions, localization, technology-access and sustainable-finance developments. • Conduct recurring fragmentation scenarios and identify early-warning indicators for priority markets, technologies and critical equipment. • Use scenario results to inform procurement, investment approval, capital allocation and review of the decarbonization pathway. Supply-Chain and Technology Resilience • Map critical technology, equipment, supplier and country dependencies across the Company’s energy, infrastructure and digital project pipeline. • Identify concentration and single-source exposures and qualify alternatives across different jurisdictions. • Develop dual-sourcing, regional sourcing, localization and contingency options where feasible. Financial Flexibility • Diversify funding sources, markets, currencies, instruments and lender relationships. • Assess exposure to changes in sustainable-finance taxonomies, cross-border capital conditions and project-finance eligibility. • Stress-test the financial effects of tariffs, higher equipment costs, financing constraints and project delays. Portfolio Agility and Governance • Incorporate geopolitical, trade, localization, technology-access and ESG considerations into investment due diligence. • Stress-test portfolio resilience under combined sourcing, financing and regulatory disruptions. • Maintain flexibility in technology alternatives, supplier selection, financing structure and geographic capital allocation.		
Impact specific to GULF			
As an international energy and infrastructure group, GULF depends on globally sourced technologies and equipment, international partnerships and diversified sources of capital. Increasing fragmentation could raise project costs, extend procurement and delivery timelines, reduce financing flexibility and constrain cross-border investment. GULF shall maintain flexibility in technology alternatives by evaluating project design, key equipment specifications and constraints at an early stage. Project planning shall be well-structured and dynamic, with alternative plans established for business operations to accommodate shifts in sourcing, financing arrangements, capital allocation, or the pace and composition of the decarbonization pathway where suitable alternatives are limited. A single geopolitical or policy development could simultaneously affect equipment availability, project economics, financing eligibility and delivery schedules, with implications for the Company’s strategic, financial and operational objectives.			

Key and Emerging Risks

Name	Nature - Positive Transition and Emerging Infrastructure Constraints
Category	Strategic – Environmental

Description
GULF identified an emerging convergence of ecosystem degradation, reduced availability of suitable low-impact sites and expanding nature-related development conditions.
Expectations concerning biodiversity and ecosystems are evolving beyond project-level impact mitigation toward greater consideration of nature dependencies, cumulative impacts, ecosystem restoration and measurable positive outcomes for nature.
Over a 7-year horizon, this transition may increasingly be reflected in international frameworks, Taskforce on Nature-related Financial Disclosures (TNFD) aligned disclosure, permitting practices, financing conditions and stakeholder requirements.
While the timing and application will vary across jurisdictions, developers may face greater expectations to mitigate sensitive areas, assess landscape-level impacts and demonstrate effective restoration outcomes. The emerging risk is not biodiversity impact itself, which is already managed through existing environmental controls, but the structural shift in external expectations toward nature-positive outcomes that may increasingly constrain where and how infrastructure can be developed.

Impact specific to GULF
GULF's power, renewable-energy and infrastructure businesses depend on access to land, water and functioning ecosystems. Nature-related constraints could affect a material portion of its future pipeline by limiting suitable sites, increasing assessment and restoration costs, incremental conditions to project financing, delaying approvals or requiring project redesign, relocation, deferral and changes to portfolio allocation.

RESIDUAL RISK

Likelihood	1
Impact	4
Risk Level	



Mitigation and Response
To manage the potential impacts of this emerging risk, GULF is strengthening its forward-looking, cross-functional approach by integrating risk monitoring and assessment into investment, project-development and portfolio decisions. Key mitigation and response measures include:
Early Screening and Site Selection • Integrate nature-related screening into investment, site-selection and project-design decisions before major land or capital commitments. • Identify protected, sensitive and high-biodiversity areas, together with material land, water and ecosystem dependencies, during feasibility assessment. • Evaluate lower-impact locations, technologies and design alternatives to preserve development flexibility and reduce permitting risk.
Impact Mitigation and Restoration • Apply the mitigation hierarchy by prioritizing avoidance, followed by minimization, restoration and, where appropriate, additional conservation measures. • Assess cumulative and landscape-level impacts for material projects where relevant to the project and local context. • Consider no-net-loss or net-gain approaches where required or appropriate, taking account of jurisdictional and financing conditions.
Portfolio Assessment and Governance • Periodically assess nature-related impacts, dependencies and emerging constraints across material projects and the development portfolio. • Consider TNFD-aligned approaches to strengthen the identification and assessment of nature-related risks and opportunities. • Incorporate material nature-related findings into investment review, project approval and portfolio-planning processes.
Stakeholder Engagement and Monitoring • Engage affected communities, regulators, lenders and other relevant stakeholders early to understand project-specific nature expectations and concerns. • Monitor developments in biodiversity frameworks, disclosure expectations, permitting practices and financing conditions. • Track material nature-related indicators, mitigation outcomes and potential constraints on priority projects.

The Company has established a business continuity management (BCM) framework, comprising emergency response plans, crisis management and communication plans, business continuity plans (BCP), as well as IT incident response and disaster recovery plans (DRP). Risk management and mitigation plans are continuously monitored, with regular reporting.

Business Continuity Management (BCM) Process

1 Risk Assessment

Identify potential risks and analyze their impacts and likelihood.

2 Business Impact Analysis

Assess impacts on operations and overall business to determine the maximum acceptable outage period.

3 Strategy Development

Define recovery strategies, roles, responsibilities, and response approaches to the disruptions.

4 Plan Development

Develop plans to address unforeseen events, comprising four main plans:

1. Emergency Plan
2. Crisis Management and Communication Plan
3. Business Continuity Support Plan
4. IT Disaster Recovery Plan

5 Implementation

Implement approved strategies and plans across relevant functions.

6 Monitoring and Performance Evaluation

Continuously monitor situations and impacts to assess effectiveness and identify weaknesses of the plans.

7 Review and Update

Review and update plans at least annually, including simulation and emergency drills.

Risk Management Infrastructure



Infrastructure is one of the four interconnected components of GULF's risk management framework, alongside culture, structure and process. It comprises the methodologies, systems and tools supporting the framework's implementation, together with the management information used to identify, assess, monitor and report risk, and is reinforced through the four elements below.

1. Assessment methodologies and rating criteria

The Risk Management Department maintains defined criteria for rating the impact and likelihood of risks on a consistent 1-5 scale, covering financial, operational, environmental, social and media-exposure dimensions. These criteria underpin the risk matrix used to plot inherent and residual risk, and are reviewed regularly with the Sustainability, Governance and Risk Management Committee.

2. Systems and reporting tools

Risk information is captured and consolidated through two core tools: the risk register, which records each risk's description, root cause, inherent and residual assessment, existing controls and risk owner; and the risk map, which aggregates risks by impact and likelihood to present the Company's overall risk profile. Together, these tools provide a consistent basis for tracking and prioritizing risk across the organization.

3. Management information

Management information develops alongside the framework to support the identification, assessment and ongoing monitoring and reporting of risks. This includes key risk indicators, KPI-based performance tracking and the periodic corporate risk assessment, which together give management and the Board timely visibility of the Company's risk profile and the effectiveness of mitigation actions.

4. An evolving foundation

Infrastructure is not static: as the Company's business and operating environment evolve, its methodologies, systems and tools are refined to keep pace. The Risk Management Department reviews the Manual, criteria and templates at least annually, with any material amendment requiring approval from the designated authority.

The Company regards a sound risk culture as the foundation of effective risk management and a critical enabler across its energy, infrastructure and digital businesses. It is built on shared values, a common risk language and clearly communicated objectives, enabling employees at all levels to understand risk expectations and incorporate risk considerations into day-to-day decisions.

Shared vision, values and risk objectives

The Company promotes a common understanding of risk across the organization through shared values, clearly communicated risk objectives and consistent risk-management principles. This provides a common reference point for how risks should be identified, assessed, escalated and managed across different businesses and functions.

Risk Criteria Embedded in Project, Product and Service Development

Risk criteria are incorporated into the development, design, approval and delivery of the Company's projects, products and services, helping ensure that material risks are considered before key business and investment decisions are made.

For power and infrastructure businesses, health, safety, environmental, technical reliability and regulatory risk criteria are considered throughout project development, construction and operation. For digital and data-center businesses, information-security, data-protection, system-availability and operational resilience criteria are incorporated into system and service design and delivery. Applying these criteria throughout the development lifecycle helps the Company identify and manage risks at the point where they arise rather than treating risk management as a separate exercise.

Accountability and KPIs

Risk management responsibilities and related KPIs are incorporated into departmental and individual performance objectives, where applicable. Performance against these objectives forms part of the Company's performance evaluation process and is taken into account in compensation and reward consideration, where applicable.

Risk-related performance measures may include the completion of risk mitigation actions, compliance with risk and control requirements, business continuity preparedness, and the timely remediation of identified control deficiencies. Relevant ESG-related objectives, including Occupational Health and Safety and Information Security and Cybersecurity, are also integrated into the Company's corporate sustainability targets, such as Zero Accidents and Zero Data Privacy and Cybersecurity Incidents.

This linkage reinforces accountability by aligning effective risk management with performance evaluation and remuneration considerations.

Communication and engagement

Risk awareness is reinforced through ongoing communication and engagement across the organization. Formal communication channels, internal awareness materials, management discussions and other engagement activities are used to communicate key risk topics, emerging issues, lessons learned and risk-management expectations. These interactions help maintain a consistent understanding of risk and encourage timely escalation and open discussion of risk-related matters.

Training and capability development

The Company continuously strengthens risk-management capabilities through training and practical learning for employees and executives. Programs cover core risk-management principles, business continuity and other relevant risk topics, supplemented by practical exercises tailored to the nature of each business; Annual risk-management and BCM training, Emergency-response and BCM exercises, Information-security and phishing-awareness activities, Subject-specific training for relevant functions and specialist teams.

