



Energy Absolute Public Company Limited

89 AIA Capital Center Building, 16th Floor, Ratchadaphisek Road, Dindaeng Sub-District,
Dindaeng District, Bangkok 10400

Announcement

No. 010 / 2026

Subject: Artificial Intelligence Governance and Usage Policy

Energy Absolute Public Company Limited Group

1. Principles and Rationale

Energy Absolute Public Company Limited and its subsidiaries (the "Group") recognise the role of Artificial Intelligence (AI) technology in enhancing operational efficiency and driving the organisation forward, together with responsible risk management. The Group has therefore established this Artificial Intelligence Governance and Usage Policy (AI Governance and Usage Policy) to serve as a framework for the governance and use of AI in a manner that is secure, transparent, responsible, and consistent with relevant laws and international standards, to be observed by the Company's directors, executives, and employees/staff at all levels.

This Policy is enforced in conjunction with, and in alignment with, the policies of the Group already in force, namely the Work Rules and Regulations, the Personal Data Protection Policy, the Information Security Policy, and the Information System Usage Policy.

2. Objectives

- 2.1. To establish clear, appropriate, and effective guidelines and standards for the governance and use of artificial intelligence systems.
- 2.2. To prevent and mitigate risks arising from use contrary to the intended purpose, which may affect information security, privacy, intellectual property, and the reputation of the organisation.
- 2.3. To protect the data of stakeholders, namely employee data, company director data, customer data, business partner data, investor data, shareholder data, joint-venture partner data, creditor data, government agency data, and confidential information of the Company, from being used with artificial intelligence systems without authorisation.



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- 2.4. To promote a culture of responsible use of artificial intelligence systems (Responsible AI) among personnel at all levels.
- 2.5. To support good corporate governance and sustainability reporting, including assessment against international criteria.

3. Scope of Enforcement

This Policy applies to all directors, executives, employees, and staff of the Group who use artificial intelligence (AI) systems for the business of the Group (collectively referred to as “Users”). In addition, the Group encourages and expects business partners and business allies falling outside the management scope of the Group to support and consider implementing this Policy as well.

Artificial intelligence (AI) systems cover use through both types of accounts, as follows:

- 3.1. Corporate Account means an account procured or acquired by the Group and managed by the Information Technology Department.
- 3.2. Personal Account (Personal Account / BYOAI: Bring Your Own AI) means a personal account of a User/employee, whether free of charge or subject to a service fee, that is brought into use, which must be secure with respect to the data of the Group and comply with the prescribed conditions.

This Policy covers artificial intelligence (AI) systems in all forms, both those currently in use and those to be developed in the future, regardless of the name or technology used.

4. Definitions

“Group”	means Energy Absolute Public Company Limited and its subsidiaries
“Artificial Intelligence (AI: Artificial Intelligence)”	means technology that enables computer systems to possess capabilities comparable to those of human beings, such as learning, reasoning, perception, language processing, and automated operation
“Generative AI”	means artificial intelligence capable of creating new content, such as text, images, audio, video, or source code, from the data and instructions (Prompt) entered by the user



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“Public AI”	means a public artificial intelligence service in which the service provider may use the data entered for further training of its models
“Enterprise AI”	means an enterprise-grade artificial intelligence service that has undergone security assessment and been approved for use, and which is subject to stringent data confidentiality agreements
“Personal Data”	means information relating to a natural person which enables the identification of that person, in accordance with the law on personal data protection
“Material Non-Public Information (MNPI: Material Non-Public Information)”	means internal information not yet disclosed to the public which may affect the price of the Company’s securities
“AI Governance Committee (AIGC: AI Governance Committee)”	means an executive-level working committee responsible for overseeing the use of artificial intelligence (AI) of the Group

The Group adheres to the principles of responsible artificial intelligence governance, which reference international principles, namely the OECD AI Principles, the UNESCO Recommendation on the Ethics of AI, the NIST AI Risk Management Framework, and the ISO/IEC 42001 standard, as follows:

5. Principles for Responsible Artificial Intelligence (AI) Governance

- 5.1. Personal data protection and privacy. Requires the protection of personal data, confidential information, and critical information of the organisation in the use and development of AI systems, with appropriate control measures throughout the lifecycle of AI, in a manner consistent with the law and with the principles of data privacy and information security.
- 5.2. Cybersecurity. AI systems must be developed, designed, and used with due regard to cybersecurity, being deemed part of the information technology system, and technical and administrative control measures must be provided, including security testing appropriate to the level of risk.



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- 5.3. Avoidance of bias and non-discrimination. Requires the principles of inclusiveness, diversity, equity, and non-discrimination to be applied in the development and use of AI, with impartial examination and evaluation of outcomes, and the implementation of measures to prevent and reduce bias that may arise.
- 5.4. Human control of AI (Human-in-the-Loop). AI must be subject to human oversight and intervention at an appropriate level. Outputs from AI must be reviewed by humans before actual use, and AI must not be used to make decisions in place of humans in critical processes.
- 5.5. Transparency and explainability. Requires AI to be used transparently and in an explainable manner. Persons interacting with AI must be notified, and the use of AI must be disclosed for outputs published to the public as appropriate.
- 5.6. Accountability and assignment of roles and responsibilities. Requires those involved in the development, use, and governance of AI to have clear roles and responsibilities for outcomes, and to retain usage records so that they can be examined and verified retrospectively.
- 5.7. Environmentally friendly and sustainable. Sustainability and ecological impact. Requires AI systems and related infrastructure, including data centres and models, to be designed and used in a manner that supports sustainability targets and has a low environmental impact.

6. Protection of Stakeholder Data and Classification of Data Confidentiality

Users are strictly prohibited from entering, copying, uploading, or transmitting stakeholder data into public artificial intelligence systems (Public AI), free-of-charge accounts, or personal accounts (BYOAI), unless written approval has been obtained as prescribed in this Policy. Data requiring special protection comprises:

- 6.1. Employee data, such as salary, performance evaluation results, national identification number, personal history, and sensitive data under Section 26 of the Personal Data Protection Act, which may be used only with Enterprise AI subject to a condition that data will not be used to train



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models (No-Training Clause) and which has undergone a personal data protection impact assessment.

- 6.2. Customer data, such as electric vehicle charging station user accounts, service usage history, payment information, and power purchase agreements, which shall be classified as confidential information at a minimum and must not be used with personal accounts.
- 6.3. Business partner and ally data, such as contracts, non-disclosure agreements (NDA), bid prices, drawings, and joint venture documents, which must not be entered into Public AI, and the confidentiality conditions of which must be verified before use.
- 6.4. Confidential information of the Company, such as material non-public information (MNPI), financial statements prior to disclosure, and trade secrets, which must not be entered into AI systems of any type before authorisation is obtained.

The Group requires the classification of data confidentiality and control over the use of data at each classification level with each type of artificial intelligence system, in accordance with the criteria prescribed by the Information Technology Department, and Users must assess the type of data before every use.

7. Acceptable Use Principles and Prohibitions

Users may apply artificial intelligence (AI) systems to support their work, such as data analysis, drafting documents, creating documents, summarising information, translation between languages, and supporting the development of programs or work systems, in order to improve work processes and increase efficiency, provided that only tools approved by the Group are used and that such use remains under the responsibility of the User. In this regard, Users are prohibited from committing the following acts:

- 7.1. Using AI to create or disseminate content that is unlawful, infringes rights, is obscene, false, distorted, or infringes the intellectual property of other persons.
- 7.2. Using AI that employs techniques of persuasion, distortion, or deception to significantly influence the behaviour of a person, or to exploit the vulnerabilities of a person.



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- 7.3. Using AI for social scoring or biometric surveillance without authorisation, consistent with the approach under the artificial intelligence law of the European Union (EU AI Act).
- 7.4. Using AI to make decisions entirely in place of humans in high-impact processes, such as the hiring or termination of employees, the granting of credit, or matters having legal effect on a person.
- 7.5. Entering confidential information, internal information, customer data, financial information, passwords, system access keys (API Key), or material source code into public artificial intelligence systems.
- 7.6. Using AI to seek personal benefit, falsifying or adjusting outputs so that they are untrue, or committing acts that cause damage to or leakage of internal information of the Group.

8. Procurement and Approval of Use

- 8.1. The procurement of a Corporate Account must undergo consideration of business necessity by the department head (DHs), a security and privacy assessment by the relevant departments, and approval in accordance with the prescribed authority, before registration in the artificial intelligence asset register (AI Asset Register).
- 8.2. Limited-scope trials (Proof of Concept) using public data or general internal data and remaining within the prescribed framework may be carried out through an expedited consideration process.
- 8.3. Use of a personal account (BYOAI). Where data of the Group is entered into an artificial intelligence (AI) system using a personal account, the account must be registered with the Information Technology Department, only tools on the approved list may be used, settings must be configured so that data is not used to train models, and only public data and general internal data may be used.

9. Personal Data Protection

The processing of personal data by artificial intelligence (AI) must strictly comply with the Personal Data Protection Policy of the Group and the Personal Data Protection Act B.E. 2562, with the following additional requirements for the use of artificial intelligence:



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- 9.1. A lawful basis for processing must be identified before processing, and services subject to a condition that data will not be used to train models must be selected.
- 9.2. A personal data protection impact assessment (DPIA) must be conducted for cases involving profiling, automated decision-making, or sensitive data under Section 26.
- 9.3. There must be a process to accommodate the exercise of rights by data subjects, and data retention periods must be limited to what is necessary.

10. Security and Use of Certified Tools

The use of AI must be consistent with the Information Security Policy and the Information System Usage Policy of the Group, AI systems being deemed part of the information technology systems of the organisation.

- 10.1. Source code produced with the assistance of AI must undergo a secure code review and vulnerability testing before actual use, and usage records must be retained for material cases.
- 10.2. The Group places importance on the selection of AI tools and service providers having management systems certified to international standards by external bodies, covering the ISO/IEC 42001 standard and ISO/IEC 27001, 27017, 27018, and 27701, together with security assessments of service providers before procurement and periodic reviews.

11. Risk Management

The Group provides for the management of risks arising from the use of artificial intelligence in various areas, namely data risk, cybersecurity risk, personal data protection risk, and ethical risk, with risks being identified, assessed, monitored, and reviewed on a regular basis, and with control measures appropriate to the level of risk and the nature of use, including the conduct of impact assessments for high-risk use cases before actual deployment.

12. Roles and Responsibilities

- 12.1. “AI Governance Committee (AIGC)” oversees operations at the executive level, meets quarterly, and coordinates and prepares sustainability disclosures, including assessment against international criteria. In this regard, representatives from the Information Technology Department, the



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Sustainability Department, the Legal and Compliance Department, the Human Resources Department, and the Internal Audit Department jointly serve on the Committee.

12.2. The Information Technology Department is the principal party responsible for proposing and implementing the Policy, procuring and managing artificial intelligence accounts and assets, and overseeing security.

12.3. Personal data protection (PDPA). The Personal Data Protection Officer (PDO) controls and audits the use of personal data in accordance with the prescribed policies and laws.

12.4. Training and employee data protection is a joint responsibility of the Human Resources Department and the Information Technology Department.

12.5. The Internal Audit Department independently audits compliance with the Policy and reports to the Audit Committee.

12.6. All Users shall comply with the Policy, verify the accuracy of outputs before use, and report abnormal incidents to the relevant departments without delay.

13. Training and Awareness Building

The Group provides communication and promotes awareness of the responsible use of artificial intelligence, including continuous training in artificial intelligence fundamentals (AI Literacy) and data protection for personnel at all levels, so that the adoption of artificial intelligence is carried out correctly, securely, and consistently with the relevant policies and laws.

14. Monitoring, Incident Reporting, and Penalties

14.1. The Information Technology Department has the right to monitor and audit the use of artificial intelligence systems within the organisation, and Users must immediately report security breach incidents, data leakage, or abnormal use to their supervisor or the relevant departments.

14.2. Violation of or failure to comply with this Policy shall constitute a disciplinary offence and may be subject to disciplinary action under the work rules and regulations of the Group according to the severity and as appropriate. In this regard, the Group reserves the right to claim damages and to take legal action if such acts cause damage to the Group or to third parties.



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15. Policy Review

The AI Governance Committee shall review and revise this Policy at least once a year, or when there are significant changes in laws, technology, or relevant standards, in order to ensure that the Policy remains current and consistent with changing circumstances.

This Policy shall come into force from the date of announcement onwards. Announced for general acknowledgement and compliance.

Announced on 13 August 2026

– Somchainuk Engrakul –

(Mr. Somchainuk Engrakul)

Chairman of the Board of Directors



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ANNEX

Responsible Artificial Intelligence procedure

Scope and Boundaries of AI Use

This Policy applies to the development, procurement, and use of all AI systems across the Company group, covering directors, executives, employees, and contractors. The Company shall define clear boundaries and limitations for AI use by specifying appropriate use cases and the limitations of each type of AI system, so that users and stakeholders understand the operational scope and limitations of such systems.

Responsible AI Principles

1. Respecting Data Privacy

Personal data, confidential information, and critical data assets shall be protected in the use and development of Artificial Intelligence (AI). Appropriate controls shall be implemented throughout the AI lifecycle in alignment with the Company's data protection framework, applicable laws, and principles of privacy and information security.

2. Protecting Cybersecurity of AI Systems

AI systems must be developed, designed, and operated with appropriate cybersecurity considerations, and treated as part of the organization's information technology environment subject to cyber threats. The Company must implement both technical and administrative controls to prevent, detect, and respond to risks, including those targeting AI systems. Regular security testing commensurate with the level of risk, such as penetration testing and vulnerability assessments, is conducted to ensure adequate protection and resilience.

3. Avoiding Potential Bias

The principles of inclusion, diversity, equality, and non-discrimination shall be applied in the development and use of AI. AI outcomes shall be reviewed and assessed objectively, and appropriate measures shall be implemented to prevent and mitigate potential biases. Bias audits shall be conducted on a regular basis. Users shall not use AI in a manner that violates human rights or results in any form of discrimination.



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4. Keeping Humans in the Loop

AI systems shall be subject to appropriate human oversight and intervention, which may include approaches such as Human-in-the-Loop or Human-on-the-Command. AI-generated outputs shall be reviewed by humans prior to actual use, and AI shall not be used as the sole decision-maker in critical processes. The rights and freedoms of individuals affected by AI systems shall take precedence over any benefits derived from their use.

5. Transparency and Explainability

AI systems shall be used in a transparent and explainable manner. Users and stakeholders shall be provided with understandable information on how AI systems operate and generate outputs. Individuals shall be informed when they are interacting with AI, and AI outputs shall be explainable at an appropriate level based on the context and risks. The use of AI assistance shall be disclosed, as appropriate, for publicly available outputs.

6. Accountability, Roles and Responsibilities

All parties involved in the development, use, and oversight of AI shall have clearly defined roles and responsibilities for outcomes and shall maintain records of AI usage to enable monitoring, audit, and retrospective review. Individuals shall be held accountable for the results and impacts of AI systems within their area of responsibility and shall not attribute accountability solely to the AI system itself. All AI-related activities shall be conducted by authorized personnel in accordance with defined governance structures.

7. Sustainability and Low Ecological Footprint

AI systems shall be developed, selected, and used in a manner that supports the Company's sustainability objectives, including contributing positively to society. AI-related infrastructure, including data centers and models, shall be designed and operated to maintain a low ecological footprint. Appropriate measures shall be taken to minimize potential environmental impacts associated with AI.

Commitment Not to Deploy Prohibited AI Systems

The Company commits not to develop, deploy, or use AI systems in the following manners, in alignment with the EU AI Act (Regulation (EU) 2024/1689, Article 5):



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- AI systems that employ manipulative, deceptive, or misleading techniques to significantly influence individual behavior
- AI systems that exploit individual vulnerabilities, including those related to age, disability, or socioeconomic conditions
- AI systems for social scoring or the evaluation of individuals in a way that leads to unfair or unjustified outcomes
- AI systems for unauthorized biometric surveillance, including real-time remote biometric identification

All AI use must comply with applicable laws and recognized ethical standards.

Use of Externally Verified AI Tools

The Company prioritizes the selection of Artificial Intelligence tools/agents and service providers whose management systems are independently certified to international standards, including ISO/IEC 42001:2023 (AI Management System) and ISO/IEC 27001, 27017, 27018, and 27701 (information security and privacy information management). This ensures that the AI tools adopted by the Company have been externally verified and governed in accordance with internationally recognized Responsible AI and information security practices.

In addition, the Company conducts Vendor Security Assessments prior to procurement and on a periodic basis to confirm the continued validity of such standards and certifications.

Governance Structure

Level	Role
Board of Directors	Endorses the Responsible AI principles and receives an annual summary report on AI governance
Risk Management Committee	Reviews and oversees AI risks on a regular basis and reports to the Board of Directors
AI Governance Committee (management-level)	Meets quarterly; coordinates and prepares sustainability disclosure (including DJSI/ESG) through the Sustainability Development function; comprises cross-functional members from IT, Sustainability



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	Development, Legal & Compliance, Human Resources, and Internal Audit, with IT serving as the lead for presentation and implementation
Relevant Functions	Responsible for AI use and KPIs. Personal data protection (DPO/PDPA) is a joint responsibility of IT, Legal & Compliance, and HR; employee training and employee-data protection is a joint responsibility of HR and IT

Grievance Channel & Disclosure

Stakeholders may raise concerns about AI use to the Data Protection Officer (DPO) at dpo@energyabsolute.co.th or through the Company's whistleblower channel. Whistleblowers are protected under the Company's Non-Retaliation policy.

The Company reports its Responsible AI progress annually in its One Report (Form 56-1) and Sustainability Report, in alignment with GRI, SASB, TCFD, and IFRS S1/S2.

Review

The Company reviews this Policy at least every 12 months, or upon significant changes in relevant laws, technology, or standards.