



PTG ENERGY GROUP

Supporting Document

on

Tax Policy

Revision Records

Revision	Effective Date	Description
03	01/01/2022	Revised the entire document.
02	01/01/2021	Added information concerning relevant tax studies, rules, regulations and guidelines in Item 4.
01	01/01/2020	Added information regarding the benefits of tax practice in Item 2.
00	25/05/2018	First implementation



Tax Policy

PTG Energy Public Company Limited (**"the Company"**) has been fully aware that, in pursuance of applicable laws, it is a responsibility of the Company to pay taxes, which will be further utilised by the state for the benefit of all people and the entire society. The Company therefore formulates a tax policy which is intended to be incorporated as a work guideline for all personnel throughout PTG Energy Group (**"the Group"**). This practice is to be adopted by both the Group itself and its subsidiaries, namely the companies of which over 50 per cent of shares are held by the Company. The procedures commence from the steps of risk assessment, factor and incident analysis, in order to identify obstacles to complete and correct tax payments, through the implementation of risk prevention measures that help tackle potential damage caused to the Group. In this regard, this practice is aimed to safeguard the benefits of all stakeholders, concurrently with contributing to the utmost added value, in line with good corporate governance that is effective, adequate, transparent and ethical. The practice states as follows:

1. The Group must adhere to and observe legal provisions pertaining to taxes and applicable regulations enforced in Thailand and the countries in which it invests, in pursuance of the spirit of laws and relevant regulations which concern both direct and indirect taxes.

2. The Group shall assign the Accounting and Financing Department to the responsibility of acquiring answers and enhancing knowledge regarding taxes by doing research on relevant laws, or seeking advice from Subject Matter Experts (SMEs). This practice aims at defining activities that do not violate applicable laws while also enables the Group to properly exploit tax incentives based on its structure and generate the utmost benefits for the Group. Meanwhile, the department shall also be responsible for contemplating, screening, summarising impacts incurred, and rendering suggestions to different departments within the Group. Afterwards, the findings will be proposed to the manager of the department, or an entrusted person, for further reviewing, revising, or updating the practice or associated handbooks in conformity to the laws, rules and regulations being enforced.

3. The Group shall file and pay taxes in a timely manner, as well as engaging in payment management and tax refunds to enhance liquidity of the Group. It is required to regularly study relevant tax practice rules and regulations in order to avoid incorrect tax payments when there is a new company acquired. Even though the Group aims to ensure correct and complete tax payments while optimising tax incentives, generated profits will never be transferred to a country where the Group is subjected to lower tax rate, and the Group shall in no way engage in tax evasion practices.

4. If there is an investment in a country outside Thailand, the Group shall conduct research on and comply with tax legislations of the country where it has presence. If such country is a country with which Thailand has entered into the Double Taxation Agreement (DTA), the Group shall need to have a deliberate plan in place to avoid double taxation between the countries possibly incurred by business transactions.

5. It is required to structure taxes appropriately to serve commercial motives. Also, there must not be contrived tax structures that lead to tax avoidance or tax evasion in any country in which its business is transacted (Tax Havens).

6. Transfer pricing of the Group shall be in accordance with the Arm's Length Principle and the Group shall observe regulations contained in the Revenue Code and applicable tax laws to ensure the price of transactions entered by related parties is independent and on an equal footing.

7. It is required to have tax risk assessment in place to heighten awareness among staff about the importance of carrying out their work cautiously and reviewing risks on an annual basis.