



“Efficiently providing you with the most reliable source of energy”



I. POLICY STATEMENT

Consistent with the key mandates of the Board of Directors of King Energy Generation Inc. ("KEGI" or the "Company"), the Company hereby formalizes the Policy in handling the Anti-Corruption Policy ("Policy").

As stipulated in SEC MC No. 24, Series of 2019, Code of Corporate Governance, Section 15. Encouraging Employee's Participation, Recommendation 15.2, the Board should set the tone and make a stand against corrupt practices by adopting an anti-corruption policy and program in its Code of Business code and Ethics. Further, the Board should disseminate the policy and program to employees across the organization through orientations and continuous training to embed them in the Company's culture.

This Policy should be read in conjunction with the Company's Code of Business and Ethics, Whistleblowing Policy, and other related policies.

II. DEFINITION OF TERMS

- (a) Corruption is a form of dishonesty or a criminal offense that is undertaken by a person or an organization that is entrusted in a position of authority, in order to acquire illicit benefits or abuse power for one's personal gain.
- (b) **Bribery** refers to the act of offering, promising, giving, requesting, or receiving something of value—whether in the form of money, gifts, favors, services, or other advantages—with the intent to influence the actions, decisions, or conduct of an officer, employee, or individual, in a position of authority or trust with full knowledge of an existing or future business dealings and other transactions with the corporation.

It includes, but is not limited to, the following specific acts within the Corporation:

1. Giving gifts, money, or favors to an officer, employee or director of the Corporation with the knowledge that they have an existing contract, transaction, or dealings with the giver, with the intent to influence business decisions.
2. Offering incentives, travel perks, entertainment, or personal benefits to employees in procurement or those involved in contract negotiations in exchange for preferential treatment in awarding contracts.
3. Providing financial benefits or personal favors to an officer, employee or director in return for confidential corporate information, business strategies, or trade secrets.
4. Granting sponsorships, donations, or contributions to an entity linked to a decision-maker within the Corporation with the expectation of securing favorable business outcomes.