

 Sea Oil Public Company Limited	Anti-Money Laundering and Counter-Terrorism Financing (AML/CFT) Policy	Document No: PY-SEA-033
		Revision No: 00
		Effective Date: 1 October 2025
		Approver: The Board of Directors (No. 5/2025)

Principles and Objectives

Sea Oil Public Company Limited and its subsidiaries (the “Group”) recognize the importance of conducting business with transparency, fairness, and in strict compliance with applicable laws, particularly laws relating to anti-money laundering (AML) and counter-terrorism financing (CTF), both domestically and internationally. This policy has been established to prevent the Company from being misused as a channel or instrument for money laundering or as a source of financial support for unlawful activities.

Scope of the Policy

This policy applies to all employees, executives, members of the Board of Directors, as well as all domestic and international subsidiaries and affiliated entities under the Company’s control (collectively referred to as the “Group”).

Policy Guidelines

- Transparent and Accountable Business Operations**
The Company promotes accurate, transparent, and traceable financial transactions and recordkeeping, while avoiding transactions that are unnecessarily complex, ambiguous, or inconsistent with normal business practices.
- Customer and Counterparty Due Diligence (CDD)**
The Company conducts appropriate due diligence on customers, counterparties, and other relevant business partners, with particular attention to high-risk cases such as foreign nationals, politically exposed persons (PEPs), or parties engaging in unusual transactions.
- Vendor Selection and Management**
The Company implements an Approved Vendor List (AVL) system to ensure vendor reliability and to prevent the Company from being misused as a conduit for money laundering or terrorist financing.
- Whistleblowing and Cooperation with Authorities**
The Company encourages employees to report suspicions or concerns regarding transactions potentially linked to money laundering or terrorism, and cooperates fully with government authorities in investigations and legal proceedings.
- Employee Training and Awareness**
The Company provides appropriate training and awareness programs to employees, particularly in departments such as finance, accounting, procurement, and risk management, to strengthen awareness and enhance the ability to identify and mitigate related risks.
- Avoidance of High-Risk Transactions**
The Company avoids entering into transactions with individuals or entities known to have been involved in criminal activities such as drug trafficking, human trafficking, money laundering, fraud, or terrorism.

Policy Review and Update

The Board of Directors shall review and update this policy at least once annually, or whenever there are changes in applicable laws or regulatory practices, to ensure that the policy remains appropriate, effective, and up to date.

This policy is hereby announced for acknowledgment and compliance by all concerned

Ms. Neeracha Panboonhom

President and Chief Executive Officer

Sea Oil Public Company Limited