Charoen Pokphand Foods Public Company Limited

Use of Inside Information and Securities Trading Policy

1. Objective

Charoen Pokphand Foods Public Company Limited has established this policy to support the fair treatment of all shareholders in using material information to make investment decisions in the company's securities, and to ensure the ethical use of insider information by directors, executives, and employees.

2. Scope

This Policy applies to the Company and its Subsidiaries.

3. Definition

Directors	Directors of the Company
Trading	The purchase, sale, transfer, or acceptance of securities and futures contracts, whether or not through the stock exchange trading board, and whether or not there is compensation.
Insider Information	Information that has not yet been disclosed to the public and is material to a change in the price or value of a security.
The Stock Exchange	The Stock Exchange of Thailand
The Company	Charoen Pokphand Foods Public Company Limited
Subsidiaries	The Company’s Subsidiary as defined by the Securities and Exchange Act
Form 59	Securities and futures contracts holding report, in the form specified by the Commission.
Form Pre-59	Advance notification form for trading of securities and futures contracts, specified by the Company.
Form 59-Project	Securities and futures contracts holding report for project team members with undisclosed material information (project-by-project), specified by the Company.
Executives	Chief Executive Officer, Chief Financial Officer, and executives as defined by the Commission, which includes the first four management-level positions reporting

directly to the Chief Executive Officer, and all individuals holding equivalent positions to the fourth-level executive.

Insider Directors, executives, and employees of the Company and/or its Subsidiaries who know, have the right to access, or are in possession of insider information due to their duties.

Blackout Period Any period before the disclosure of information in the following cases:

a. Operational results:

This refers to the period before the disclosure of the Company's operational results and the submission of the Company's financial statements to the Stock Exchange for each quarter. This period starts from the day after the end of the quarter to (and include) the day the Company has fully disclosed such information for that quarter.

b. Projects with material information yet to disclose to the Stock Exchange:

This refers to the period from the start of the project to (and include) the day the Company has disclosed the project's information to the Stock Exchange, or the project's end date (whichever is applicable).

c. Other cases not covered in a. and b.:

This refers to the period as notified by the Company Secretary Office on a case-by-case basis, prohibiting the trading of securities and futures contracts.

The Commission The Securities and Exchange Commission

Futures Contracts Futures contracts as specified by the Office. In this case, it means futures contracts that are based on the price or return of ordinary shares issued by the company and are traded on the Thailand Futures Exchange (TFEX).

Securities Refers to following types of securities:

1. Securities issued by the Company, which include:

(1) Ordinary shares

(2) Warrants

(3) Transferable subscription rights

(4) Any other convertible securities that can be converted into securities under (1)

(5) Structured debenture

2. Non-Voting Depository Receipts (NVDRs) for the securities under item 1(1)
3. Derivative warrants that have the securities under item 1(1) as an underlying factor.

4. Roles and responsibilities

4.1 Board of Directors

4.1.1 Approve this policy and oversee the implementation of appropriate internal controls to prevent insiders from illegally exploiting for their own or others' benefit, and to create organizational transparency in the fair disclosure of information to shareholders.

4.1.2 Acknowledge and comply with this policy.

4.2 Company Secretary Office

Establish a system, guidelines, and work processes to comply with this policy. Also, review the suitability of the system, guidelines, and work processes to align with changes in circumstances, rules, regulations, and legal requirements.

4.3 Investment and Business Development Office or Legal Office

4.3.1 Notify the Corporate Compliance Office of the project name and the list of project insiders whenever there is a project with material information that has not been disclosed to the Stock Exchange. This notification must be made within 3 business days from the project start date or from the date an individual's name is added to the project's work group.

4.3.2 Notify the Corporate Compliance Office of the project cancellation date (if applicable) within 3 business days from the date of acknowledgement.

4.4 Corporate Compliance Office

4.4.1 Notify the Company Secretary Office of the information received under sections 4.3.1 and 4.3.2 within one business day.

4.4.2 Oversee compliance with this policy.

4.5 Directors, Executives and Insiders

4.5.1 Understand and comply with this policy.

4.5.2 Report such violation through the channels outlined in the Company's Whistleblowing Policy or by notifying the Company Secretary Office.

4.6 Internal Audit Office

In cases where a report may constitute a violation of this policy, the Internal Audit Office shall proceed according to the Company's internal rules on Disciplinary Investigation and Punishment. Upon completion of the process, the Internal Audit Office shall inform the Company Secretary Office.

5. Guidelines

5.1 General Practices

5.1.1 Directors, executives, and insiders are prohibited from using insider information for personal gain or disclosing it to others by any means, whether directly or indirectly. This applies when they know or should know that the recipient might use the information to trade securities or futures contracts, whether for themselves or others, and regardless of whether they receive compensation.

5.1.2 Directors, executives, and insiders must keep all important, undisclosed information confidential. Disclosure of the information should be limited to those directly involved on a need-to-know basis. The distribution of documents and other information should be minimized. In cases where the information must be disclosed broadly within the Company, the Company must indicate that the information is confidential and has usage restrictions.

5.1.3 The Company must establish storage and protection systems to ensure that insider information will not leak, get altered, duplicated, or deleted without authorization, and is not used for personal gain or disclosed to others.

5.1.4 Directors, executives, and insiders are prohibited from trading securities or futures contracts during the blackout period as specified in this policy.

5.1.5 Outside of the blackout period, if a director, executive, or insider (as per section 5.2.2.2 (b)) intends to trade securities or futures contracts, they must provide advance notification of the transaction using the Pre-59 form to the Company Secretary Office at least one business day before the transaction date.

5.1.6 In cases where a third party is part of a project team with undisclosed material information, the Company must ensure that said third party exercises the same level of care as the Company's directors, executives, and insiders until the project's information is disclosed to the Stock Exchange. Furthermore, these individuals must sign a Confidentiality Agreement.

5.2 Reporting Requirements for Trading Securities and Futures Contracts

5.2.1 Reporting Individuals

5.2.1.1 Directors

5.2.1.2 Executives

5.2.1.3 Insiders

5.2.2 Reporting Principles and Submission

5.2.2.1 In case of reporting individuals who are directors or executives of the Company:

They must prepare a report on changes in holdings of securities and futures contracts (Form 59) according to the principles and process announced by the SEC Office.

The report must also cover changes in securities or futures contracts held by the director's or executive's close associates, which include:

(1) Spouses or those cohabiting partners.

(2) Minor children.

(3) Legal entities where the director or executive, and the individuals in (1) and (2) collectively hold more than 30% of the total voting rights of that legal entity, and where their combined shareholding is the largest proportion in that entity.

(4) Any other person who holds or trades securities and futures contracts on behalf of the director or executive, and the individuals in (1) - (3).

(5) Personal funds of the director or executive, and the individuals in (1) - (4).

5.2.2.2 In case of reporting individuals who are insiders:

(a) Insiders who are on the list of a project team with undisclosed material information must prepare and submit a report on holdings of securities and futures contracts (Form 59-Project) as specified in section 5.2.2.3, as follows:

First time	Within 7 days from the project start date or from the date they were listed as a member of the project team (whichever comes first).
Second time	Within 7 days from the date the Company disclosed the project information to the Stock Exchange or the project cancellation date (whichever is applicable).

(b) Aside from the case in section 5.2.2.2 (a), insiders must report changes in their holdings of securities and futures contracts by applying section 5.2.2.1. They must also submit the report on changes in holdings of securities and futures contracts through the process and channels specified in section 5.2.2.3 (b) within 3 days from the date the change in holdings of securities or futures contracts occurred.

5.2.2.3 Report Submission and Submission Channels

(a) In case of a reporting individual who is a director or executive of the Company:

The report under section 5.2.2.1 must be submitted through the SEC Office's electronic system (www.sec.or.th) within the period specified by the Office.

(b) In case of a reporting individual who is an insider:

The report under section 5.2.2.2 must be submitted through the Company's electronic system.

5.2.2.4 Roles and Responsibilities of the Company Secretary Office

(a) Inform the reporting individuals of the blackout period for trading securities and futures contracts.

(b) Store copies of the reports from sections 5.2.2.1 and 5.2.2.2 in a computer system that allows for viewing without text alteration.

(c) Report the directors' and executives' holdings and changes securities and futures contracts to the Board of Directors on a quarterly basis.

6. Penalty

In case that directors, executives, and insiders engage in any action that violates or does not comply with this Policy, whether directly or indirectly, they will be subject to disciplinary action in accordance with the Company's or its Subsidiaries' work rules (in case of executives, employees, or insiders), as well as penalties as prescribed by law.

7. Policy Revision

The Company Secretary Office shall review this Policy annually or at other appropriate intervals if it is determined that this Policy is no longer suitable for the condition, laws, and regulations. The Company Secretary Office shall then present the reviewed and revised Policy to the Board of Directors for approval and implementation.

8. Effective Date

This Insider Trading Policy was approved by the Board of Directors' and effective on December 14, 2022.