



Charoen Pokphand Foods Public Company Limited

Anti-Bribery and Corruption Policy



1. Objective

Charoen Pokphand Foods Public Company Limited believes that conducting business with fairness, integrity, transparency, and responsibility towards all stakeholders is significant to sustainable business growth. Therefore, the Company has established this Anti-Bribery and Corruption Policy to serve as a framework for the Company and/or its Subsidiaries in business operations.

2. Scope

This Policy applies to the Company and its non-listed Subsidiaries. However, listed Subsidiaries and its subsidiaries may adopt and adjust this Policy as necessary to align with the business context and internal management processes on the ground of geosocial conditions of each country in which they operate.

3. Definition

The Company	Charoen Pokphand Foods Public Company Limited
Subsidiaries	Subsidiary as defined by the Securities and Exchange Act, and a subsidiary that appears in the Company's financial statements, but excludes: (a) A subsidiary whose common shares are listed on any stock exchange. (b) A subsidiary of a subsidiary as described in (a).
Associated Company	An associated company as defined by the Securities and Exchange Act, and associated company that appears in the Company's financial statements, including joint ventures.
Directors	Directors of the Company and/or its Subsidiaries
Executives	Executives of the Company and/or its Subsidiaries (as referenced in the Human Resources Department's organizational hierarchy).
Employees	Employees of the Company and/or its Subsidiaries, who receive monthly or daily wages, whether under permanent, temporary, or special contractual employment.
Personnel	Directors, executives, and employees of the Company and/or its Subsidiaries.
Related Person	Close Associates or legal entities connected to the Company's personnel, including:



- (1) Close Associates
- (2) Ordinary partnerships in which the personnel, the personnel's spouse or cohabiting partner (in a marital relationship), or the personnel's underage children are partners.
- (3) Limited partnerships, limited companies, or public limited companies in which the personnel, the personnel's spouse or cohabiting partner (in a marital relationship), or the personnel's underage children collectively hold more than 30% of the shares.
- (4) Legal entities in which the personnel have managerial authority as a representative of the entity.

Close Associates An individual connected by blood relationship, marriage, or legal registration, including parents, siblings, spouses or cohabiting partners (in a marital relationship), and children, including adopted child.

Fraud Intentional act to secure undue benefit for oneself or related person(s). Fraud can be categorized into three types: Corruption, Embezzlement, and Reporting Fraud.

Corruption Any form of bribery, whether by offering, promising, giving, undertaking, demanding, or accepting money, assets, or any other inappropriate benefit to any state official, state agency, private entity, business partner, person in charge, or executive and employee within the Company and/or its Subsidiaries, whether directly or indirectly, in order for that individual to perform or refrain from performing their duties, with the aim of obtaining or retaining business, or improperly influencing business for the Company and/or its Subsidiaries specifically, or to obtain or retain any other inappropriate benefit, unless such actions are permitted by applicable laws, regulations, announcements, rules, local customs, traditions, or established business practices.



4. Roles and responsibilities

4.1 Board of Directors

4.1.1 Establish policies and oversee the implementation of an effective anti-bribery and corruption system to ensure that all employees are aware of and emphasize the importance of anti-bribery and corruption, and that these values are ingrained as part of the organizational culture.

4.1.2 Supervise, encourage, support, and lead by example to ensure personnel actively oppose and prevent any actions that constitute bribery and corruption.

4.2 Corporate Governance and Sustainable Development Committee

Ensure the policy is reviewed regularly to align with business operations and relevant laws. Furthermore, endorse any revisions before submitting them to the Board of Directors for approval. This includes providing constructive feedback and recommendations to management on developing implementation plans for the policy.

4.3 Audit Committee

Review the financial and accounting reporting systems, internal control systems, internal audit systems, and risk management systems to ensure they meet international standards, are concise, appropriate, up-to-date, and provide complete and accurate reporting.

4.4 Executives

4.4.1 Establish systems, operational processes, and measures to comply with the Anti-Bribery and Corruption Policy. Additionally, ensure that these established systems, operational processes, and measures are functional and align with changes in business, regulations, rules, and legal requirements.

4.4.2 Encourage and support compliance with the Policy and anti-bribery and corruption operational guidelines by communicating them to employees and all relevant parties.

4.4.3 Oversee employees' compliance with the Policy, systems, operational processes, and anti-bribery and corruption measures.

4.5 Employees

4.5.1 Understand and comply with the Anti-Bribery and Corruption Policy, as well as related guidelines and measures.



- 4.5.2 Not neglect any actions that may constitute bribery and corruption related to the Company and/or its Subsidiaries. Report any actions that may violate this Policy through the channels outlined in the Company's or its Subsidiaries' Whistleblowing and Complaints Policy.

4.6 Corporate Compliance Office

- 4.6.1 Review the Policy and guidelines on anti-bribery and corruption to ensure they comply with relevant laws, best practices, and are appropriate for the business operations of the Company and/or its Subsidiaries.
- 4.6.2 Communicate and raise awareness among Personnel regarding the Policy and guidelines on anti-bribery and corruption, ensuring their understanding and adherence.
- 4.6.3 Monitor compliance with the Anti-Bribery and Corruption Policy.
- 4.6.4 Collaborate with the Internal Audit Office and relevant departments in managing cases involving actions that may violate this Policy.

4.7 Internal Audit Office

- 4.7.1 Review to ensure that the Company and/or its Subsidiaries have adequate and appropriate internal control systems for potential bribery and corruption risks. Also, review compliance with the internal control systems, including but not limited to compliance with policies, guidelines, delegation of authority, rules, and laws, and report the review results to the Audit Committee.
- 4.7.2 Handle complaints/reports regarding bribery and corruption. Including coordination with relevant departments to resolve those complaints/reports.

5. Guidelines

- 5.1 Personnel of the Company and/or its Subsidiaries must comply with the Anti-Bribery and Corruption Policy, the Code of Conduct, and other relevant policies and guidelines. Furthermore, comply with all applicable anti-bribery and corruption laws in every country where the Company and/or its Subsidiaries operate.
- 5.2 Personnel of the Company and/or its Subsidiaries must not be involved in any actions that constitute bribery and corruption, whether for the benefit of the Company and/or its Subsidiaries, for personal benefit, and/or for the benefit of Related Persons, whether directly or indirectly.
- 5.3 Personnel of the Company and/or its Subsidiaries must not neglect any actions that may constitute bribery and corruption related to the Company and/or its Subsidiaries. They must report such matters to their supervisors or
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through the channels outlined in the Company's or its Subsidiaries' Whistleblowing and Complaints Policy and must cooperate in the investigation. If there are any inquiries, consult with supervisors or responsible person.

- 5.4 Provide fairness and protection to Personnel who refuse to engage in actions that may constitute bribery and corruption, or report incidents of bribery and corruption related to the Company and/or its Subsidiaries, in accordance with the protection measures specified in the Whistleblowing and Complaints Policy, even if such actions result in the Company losing business opportunities.
- 5.5 Communicate the Anti-Bribery and Corruption Policy, including the internal channels for reporting concerns, complaints, or suggestions within the Company and/or its Subsidiaries, through channels such as director and employee orientation programs, the Intranet, etc., to enhance knowledge and understanding among Personnel for the implementation of this Policy.
- 5.6 Uphold and emphasize the importance of providing knowledge on anti-bribery and corruption to Associated Company, customers, business partners, including outsourced business partners who have business transactions or vested interests with the Company and/or its Subsidiaries, to enhance understanding and support for anti-bribery and corruption matter, as well as disclosing information regarding the Anti-Bribery and Corruption Policy to the public.
- 5.7 Establish human resource management processes that reflect the commitment to the Anti-Bribery and Corruption Policy, which cover recruitment process, training, performance evaluation, compensation, promotion, and organizational structuring to ensure appropriate duties segregation for checks and balances, as well as taking steps to ensure sufficient and skilled resources and personnel for the implementation of this Policy.
- 5.8 Establish an adequate and appropriate internal control system, emphasize bribery and corruption risks, and ensure regular reviews of this system.
- 5.9 Actions taken in accordance with the Anti-Bribery and Corruption Policy shall follow the guidelines stipulated in the Company's Code of Conduct, policies and guidelines regarding stakeholders, as well as the relevant regulations and operation manuals, and any other guidelines that the Company and/or its Subsidiaries may establish in the future.
- 5.10 To ensure certainty in actions related to bribery and corruption, the Company and/or its Subsidiaries have established the following policies and guidelines for Personnel at all levels in exercising caution regarding the following matters:



- 5.10.1 Gifts & Benefits
- 5.10.2 Hospitality
- 5.10.3 Sponsorship
- 5.10.4 Charitable Donations and Community Investment
- 5.10.5 Political Contributions
- 5.10.6 Facilitation Payment
- 5.10.7 Revolving Door

For those mentioned above, please refer to “**6. Other Policies Related to the Anti-Bribery and Corruption Policy.**”

5.11 Support and cooperate with private sectors, government, and civil society, both domestically and internationally, in anti-bribery and corruption.

5.12 Report the results of audits conducted in accordance with the Anti-Bribery and Corruption Policy, related policies and guidelines, to the Audit Committee on a regular basis.

6. Other Policies Related to the Anti-Bribery and Corruption Policy

6.1 Gifts & Benefits Policy

6.1.1 Definition

Gift Any valuable given as a gesture of goodwill, affection, charity, or as a token of appreciation to business associates to build positive relationships or business relationships.

Benefits Any valuable, including price reductions, entertainment, services, training, or other similar items.

6.1.2 Principle

6.1.2.1 Do not give or accept gifts or any benefits that may affect decision-making in the performance of duties and must comply with Company regulations.

6.1.2.2 Giving or receiving gifts or other benefits in accordance with acceptable business customs or traditional festivals with a value not exceeding 3,000 Baht or the equivalent legal limit in each country is permissible.

6.1.2.3 If it is necessary to accept gifts or other benefits with a value exceeding 3,000 Baht, the head of each department shall consider and take appropriate action. The gifts or other benefits must not exceed the legal limit in each country.

6.2 Hospitality Policy

6.2.1 Definition

Hospitality Expenses incurred for business hospitality, such as meals, beverages, accommodation, transportation, and travel costs, or other expenses paid for business hospitality related to the Company or its Subsidiaries for external parties to build positive relationships or business relationships within reasonable limits, at an appropriate value, and in accordance with customs, traditions, and applicable laws.

6.2.2 Principle

Hospitality is permissible if it serves to maintain business relationships, but it must not influence business decisions, is appropriately valued according to customs and traditions, not exceed legal limits, and comply with the Company's Internal Rules.

6.3 Sponsorship Policy

6.3.1 Definition

Sponsorship Provision of money or assets by the Company or its Subsidiaries to support activities or projects to promote reputation and positive image for the Company or its Subsidiaries.

6.3.2 Principle

Sponsorship must be intended to enhance the positive image of the Company. It must be done without expectation of benefits which considered bribery and must be carried out in accordance with the Company's Internal Rules.

6.4 Charitable Donations and Community Investment Policy

6.4.1 Definition

Charitable Donations Donation of money or assets by the Company or its Subsidiaries for charity and public benefit.

Community Investment Long-term investments and contributions aligned with the Corporate Social Responsibility Strategy.

6.4.2 Principle

Charitable Donations and Community Investment must benefit society and enhance the Company's positive image, without the expectation of reciprocal benefits or being used for bribery and corruption. Also, it must be carried out in accordance with the Company's regulations.

6.5 Political Contributions Policy

6.5.1 Definition

Political Contributions: Provision of support to political parties, whether monetary or non-monetary.

6.5.2 Principle

The Company and its Subsidiaries maintain a politically neutral stance and do not affiliate with any political groups. Any monetary or non-monetary support must be transparently provided to political parties for the purpose of promoting a democratic regime of government with the King as Head of State. It must be done without any expectation of benefits that could be considered bribery and corruption, and without the intention to induce inappropriate or unlawful actions. All such activities must be carried out in accordance with the Company's regulations.

6.6 Facilitation Payment Policy

6.6.1 Definition

Facilitation Payment Expenses paid unofficially to a state official to secure or expedite the performance of a procedure, which discretion of a state official is not required and is the lawful performance of his/her duty. Moreover, the procedures shall be the rights to which the payer (the company) of the

facilitation payments is legally entitled, e.g. obtainment of a license, an application for a certificate, or entitlement to public services.

Reference: Guidelines on Appropriate Internal Control Measures for Juristic Persons completed to Prevent Bribery of State Officials, Foreign Public Officials and Agents of Public International Organisations, Office of the National Anti-Corruption Commission

6.6.2 Principle

The Company and its Subsidiaries have a policy of not paying facilitation payments in any form, whether directly or indirectly.

For clause 6.1 – 6.6, refer to the Company’s Internal Rules: “Gifts & Benefits Rules”

6.7 Revolving Door Policy

6.7.1 Definition

State official Government official or local official holding a position or receiving regular salary, person performing duties in a state agency or a state enterprise, local administrator, deputy local administrator, assistant local administrator and member of a local assembly, official under the law on local administration or other official as provided by the law, and shall include member of a Board/Commission/Committee or of a Sub-Commission/Sub-Committee, employee of a government agency, state agency or state enterprise and person or group of persons permitted by law to exercise or being assigned to exercise the administrative power established under the government system, state enterprise or other state administration, including persons holding political positions, judges of the Constitutional Court, persons holding positions in independent agencies, and the National Anti-Corruption Commission (NACC). In this regard, the scope is limited specifically to state officials under the Notification of the National Anti-Corruption Commission Prescribing Positions Prohibited from Performing Acts under Section 127 B.E. 2563 (2020).

Reference: ORGANIC ACT ON ANTI-CORRUPTION B.E. 2561 (2018) Section 4



6.7.2 Principle

Do not hire or appoint current state officials. However, former state officials who have vacated for at least 2 years may be hired or appointed as executives of the Company or its Subsidiaries, provided that such actions comply with the Company's rules.

Refer to the Company's Internal Rules: **“Revolving Door Rules”**.

7. Penalty

In case that Personnel engage in any action that violates or does not comply with this Policy, whether directly or indirectly, the Personnel (as applicable) will be subject to disciplinary action in accordance with the Company's or its Subsidiaries' work rules or other relevant regulations, as well as penalties as prescribed by law.

8. Policy Revision

The Corporate Compliance Office shall review this Policy annually or at other appropriate intervals if it is determined that this Policy is no longer suitable for the business operations of the Company and/or its Subsidiaries. The Corporate Compliance Office shall then present the reviewed and revised Policy to the Corporate Governance and Sustainability Committee for consideration before submitting it to the Board of Directors for approval and implementation.

This Anti-Bribery and Corruption Policy was approved by the Board of Directors on December 12, 2023.