Anti-Fraud and Anti-Corruption

Policy and Guidelines

Leadership Development Charoen Pokphand Group Co., Ltd.

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Anti-Fraud and Anti-Corruption Policy and Guidelines

Leadership Development Charoen Pokphand Group Co., Ltd.

1. Intent

Leadership Development Charoen Pokphand Group Co., Ltd. realizes that fraud and corruption seriously threatens free and fair competition and contravene ethical standards which cause long-term damages to the country, its people, and our organization. Fraud and corruption also increase unnecessary expenses and costs, reduce competitiveness and ethical business standards, resulting in weakened corporate governance systems as well as company reputation.

Leadership Development Charoen Pokphand Group Co., Ltd. is therefore committed to operate our businesses by upholding our core values and Code of Conduct as well as good corporate governance principles. In addition, Leadership Development Charoen Pokphand Group Co., Ltd. also complies with both local and international anti-corruption laws, which reflects our zero-tolerance policy towards all direct and indirect forms of corruption. Furthermore, Leadership Development Charoen Pokphand Group Co., Ltd. promotes employees' understanding and awareness in preventing fraud and corruption, while also providing anti-corruption guidance to relevant stakeholders. This is to foster a positive business environment that is a vital foundation to sustainable business operations.

2. Scope

This Policy and Guidelines apply to Charoen Pokphand Group, (hereafter "the Group") which includes Charoen Pokphand Group Co., Ltd., and all its subsidiary companies that Charoen Pokphand Group Co., Ltd. has management control. The term "company" hereafter refers to any such company individually that has adopted this Policy and Guidelines. This document shall be reviewed at least once a year, or as conditions require.

3. Objective

To provide directors, management, and staff with fraud and corruption prevention guidelines in every business activity in order to ensure prudent decision-making.

4. Roles and Responsibilities

4.1 Board of Directors

4.1.1 Approve the Anti-Fraud and Anti-Corruption Policy and Guidelines.

4.1.2 Oversee business activities and their compliance with core values, applicable laws, company regulations, rules, policies and guidelines as well as promote the effective implementation of this Policy and Guidelines.

4.1.3 Promote and support a corporate culture of integrity and transparency in business operations.

4.2 Management

4.2.1 Determine company regulations and measures for employee implementation.

4.2.2 Determine the corporate structure consisting of responsible persons with appropriate roles and responsibilities.

4.2.3 Ensure that risk management and internal control systems are in place.

4.2.4 Ensure that accounting and financial reporting systems comply with relevant standards.

4.2.5 Foster an anti-fraud and corruption corporate culture.

4.2.6 Supervise, manage and support the implementation of policies and company regulations.

4.2.7 Promote employee understanding of this Policy and Guidelines.

4.2.8 Ensure that there is an internal audit process in place.

4.2.9 Ensure that whistleblowing and complaints channels, including protective measures for whistleblowers or complainants, are in place.

4.2.10 Review performance reports on anti-fraud and corruption, in addition to determining areas for improvement.

4.2.11 Report progress to the responsible committee.

4.3 **Responsible Department/Persons**

4.3.1 Assess fraud and corruption risks and establish internal controls in all activities with potential risks.

4.3.2 Establish anti-fraud and corruption due diligence process for the company's business projects and activities as well as of prospective suppliers.

4.3.3 Monitor and evaluate the efficiency of compliance with this Anti-Fraud and Anti-Corruption Policy and Guidelines.

4.3.4 Develop and review anti-fraud and corruption procedures to reflect evolving risks.

4.3.5 Prepare financial statements and disclose financial information in accordance with internationally-recognized financial reporting standards, as well as setting up storage systems for financial documents.

4.3.6 Establish human resource management process in line with anti-fraud and corruption measures that encompass employee recruitment, training, performance evaluation, promotion, compensation and benefits, and resignation.

4.3.7 Promote awareness, communicate, and advise employees regarding anti-fraud and corruption.

4.3.8 Examine and audit operations to ensure their compliance with laws, rules, regulations, policies and guidelines in addition to prepare progress reports.

4.4 **Staff**

4.4.1 Learn and comply with laws, Policy and Guidelines as well as company regulations.

4.4.2 Report or blow the whistle when perceiving potential violation of this Policy and Guidelines.

5. Guidelines

5.1 Assess risks in all business activities to identify opportunities for fraud and corruption.

5.2 Act with integrity, transparency and comply with laws, policies, Code of Conduct, rules and company regulations, as follows:

5.2.1 Offering and Receiving Gifts and Benefits

Do not offer or receive gifts or benefits that may compromise business decisions by complying with company regulations.

In terms of customs or traditions, employees may offer and receive gifts or benefits that do not exceed the value as specified by law or are in accordance with company regulations.

5.2.2 Hospitality and Entertainment

Hospitality and entertainment are allowed, provided that the intent is to maintain business relationships with customers and suppliers. However, they must not compromise business decisions, do not exceed the value as specified by law, or are in accordance with company regulations.

5.2.3 Facilitating Payment

Facilitating payments must be handled transparently and in accordance with company regulations. The company does not support any facilitating payments that may lead to fraud and corruption.

5.2.4 Charitable Contributions and Sponsorship

Charitable contributions and sponsorships must be conducted in accordance with company regulations without expecting any benefits in return or used for the purpose of fraud and corruption.

5.2.5 Political Contributions

Conduct business by maintaining political neutrality and not acting in favor of any political parties. Both monetary and non-monetary political contributions must be handled transparently to promote democracy without any intention to induce improper or unlawful behavior.

5.2.6 Revolving Door

The employment of public officials as a company director, advisor, or top executive is allowed only if the public official has subjected to a cooling-off period as specified by local laws and in accordance with company regulations. This is in order to prevent potential conflicts of interest and favors from the public sector.

5.2.7 Conflicts of Interest

Perform duties according to the assigned roles and responsibilities in order to proceed with company objectives without using authority to seek benefits for oneself or related persons.

5.2.8 Acting on Behalf of Company

Communicate the Anti-Fraud and Anti-Corruption Policy and Guidelines to all external persons and entities appointed to represent the company for their understanding and compliance.

5.3 Support and collaborate with local and overseas organizations from the private sector, public sector, and civil society in promoting anti-fraud and corruption.

5.4 Communicate and promote awareness on anti-fraud and corruption to employees and external stakeholders throughout the supply chain.

5.5 Report on performance in relation to this Policy and Guidelines as well as anti-fraud and anti-corruption measures.

6. Training

The Company shall communicate and cascade the Anti-Fraud and Anti-Corruption Policy and Guidelines through training programs, conferences, and other various activities to its directors, management, staff and external stakeholders including suppliers, business partners and the general public throughout the supply chain. The effectiveness of training shall be evaluated after each session.

7. Whistleblowing

Report or blow the whistle any potential wrongdoings related to this Policy and Guidelines by following the Whistleblowing Policy and Guidelines. All whistleblowers or complainants shall be protected from retaliation regarding their employment status and receive remediation, with their information to be kept confidential both during and after the investigation processes.

8. Policy Guidance

If employees suspect any conduct that could violate laws, company regulations, and this Anti-Fraud and Anti-Corruption Policy and Guidelines, they can seek guidance from their supervisors, responsible departments or persons, the Compliance Department or Legal Department before carrying out any action.

9. Penalties

Employees must cooperate in providing reliable and accurate information to both internal and external authorities during the investigation process. Any violation or failure to comply with this Policy and Guidelines will be subject to disciplinary action in accordance with company regulations.

10. Related Laws, Regulations, and Policies

10.1 Related anti-corruption laws

10.2 Gifts and Benefits Policy and Guidelines – Leadership Development Charoen Pokphand Group Co., Ltd.

10.3 Code of Conduct – Leadership Development Charoen Pokphand Group Co., Ltd.

10.4 Supplier Code of Conduct – Leadership Development Charoen Pokphand Group Co., Ltd.

10.5 Anti-Money Laundering and Counter-Terrorist Financing and the Proliferation of Weapons of Mass Destruction Policy and Guidelines – Leadership Development Charoen Pokphand Group Co., Ltd.

10.6 Whistleblowing Policy and Guidelines – Leadership Development Charoen Pokphand Group Co., Ltd.

10.7 Conflicts of Interest Policy and Guidelines – Leadership Development Charoen Pokphand Group Co., Ltd.

10.8 Risk Management Policy and Guidelines – Leadership Development Charoen Pokphand Group Co., Ltd.

10.9 Personal Data Protection Policy and Guidelines – Leadership Development Charoen Pokphand Group Co., Ltd.

11. Appendix

The following Appendix is attached to this Policy and Guidelines:

11.1 Appendix A: Definitions

Appendix A

Definitions

1. Corruption

Any misuse of authority to obtain undue benefits in all forms, including the offering and acceptance of bribes. This also covers the proposing, promising, demanding, offering and receiving money, assets, or other benefits to public officials, public agency, private entity, or persons in position of authority, whether directly or indirectly, in order for the receiving party to perform or not perform their duties in return for an improper business advantage.

2. Fraud

Any wrongful or criminal act intended to result in financial or personal gain for oneself or others, including their spouse, children, relatives, or close acquaintances.

3. Gift

Monetary or non-monetary items or services that is offered and/or received on special occasions besides personal salary, income, and employment benefits.

4. Benefit

Items of value, including price reductions that exceed normal trading conditions, entertainment, services, training programs, etc.

5. Traditions

Any festivals or occasions where gifts may be exchanged as a gesture of congratulations, gratitude, welcome, condolences, or an offer of assistance that is practiced in society.

6. Customs

Generally accepted activities practiced in accordance to cultural influences.

7. Entertainment

The action of providing amusement or enjoyment in order to make them feel comfortable, content, and happy.

8. Hospitality

The offering of food, drinks or services, including watching a show or a sports event, participating in recreational activities or sports, such as golf, as a special occasion to external parties who has a business relationship with the company.

9. Facilitating Payment

A payment made to government officials in order to secure or expedite the performance of a routine action, including payments to receive special privileges over others.

10. Charitable Contributions

The offering of cash, items, or other assets of value to an agency or charitable organization for public interest without expecting any benefits in return.

11. Sponsorships

Cash, items, or benefits offered to external organizations or persons to promote the company image or reputation.

12. Political Contributions

The offering of financial or non-financial support to politicians, political parties, or politically exposed persons, such as cash, employees, venues, equipment, or other facilities.

13. Public officials

Politicians, government officials or top executives working in state enterprises or government agencies, including members of sub-committees from government departments, state enterprises or government agencies that may provide favors to the company.

14. Conflict of Interest

Any situation, action, or inaction in which the individual in question has a personal interest that contradicts the company's interests and, as a result, may affect their ability to make decisions or discharge their responsibilities, harm the company's interests, or lead to misconduct or corruption.