Anti-Money Laundering

and Counter-Terrorist Financing

and Proliferation of Weapons of Mass Destruction

Policy and Guidelines

Leadership Development Charoen Pokphand Group Co., Ltd.

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Anti-Money Laundering and Counter-Terrorist Financing and Proliferation of Weapons of Mass Destruction Policy and Guidelines

Leadership Development Charoen Pokphand Group Co., Ltd.

1. Intent

Leadership Development Charoen Pokphand Group Co., Ltd. realizes that money laundering and terrorism financing and the proliferation of weapons of mass destruction leads to illegitimate business operations. As a good corporate citizen that operates ethically with transparency while maintaining its responsibility towards society, Leadership Development Charoen Pokphand Group Co., Ltd. aims to prevent the business operations of our subsidiaries, including ones that are required and not required to comply with Anti-Money Laundering Acts as well as Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing Acts, from being exploited as a channel for criminal activity.

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 guidelines on accepting customers, performing customer due diligence, managing risks of being used as a channel for money laundering, and complying with company processes and procedures.

4. Roles and Responsibilities

4.1 Board of Directors

4.1.1 Consider and approve the Anti-Money Laundering and Counter-Terrorist Financing and the Proliferation of Weapons of Mass Destruction Policy and Guidelines.

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

4.2 Management

4.2.1 Determine rules, regulations and measures on anti-money laundering, counter-terrorist financing and the proliferation of weapons of mass destruction.

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 measures and processes comply with laws, Policy and Guidelines, as well as company regulations.

4.2.4 Promote employee understanding of this Policy and Guidelines.

4.2.5 Supervise, manage, and support compliance with policies and company regulations.

4.2.6 Report progress to the responsible committee.

4.3 Responsible Department / Person

4.3.1 Manage the prevention of money laundering, terrorist financing and the proliferation of weapons of mass destruction risks.

4.3.2 Develop an operating manual that aligns with this Policy and Guidelines as well as company regulations.

4.3.3 Provide training and build employee understanding to ensure they can apply this Policy in practice.

4.3.4 Follow up on implementation to be reported to management.

4.3.5 Report to regulators where required by law.

4.4 Staff

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

4.4.2 Report or blow the whistle when perceiving any possible wrongdoing or suspicious behavior related to money laundering, terrorist financing, or the proliferation of weapons of mass destruction.

5. Guidelines

5.1 Conduct business operations with trustworthy customers who operate in compliance with the law while refraining from business relationships with persons or juristic persons suspected of engaging in illegal activities.

5.2 Comply with the Know Your Customer process (KYC) according to company procedures by requesting and verifying identification documents.

5.3 Perform Customer Due Diligence according to company procedures before beginning any business relationship.

5.4 Retain the details of identification documents, verification documents, and customer transactions.

5.5 Review and update customer information as specified by the company or within 2 years or when identifying a suspicious transaction.

5.6 Compile suspicious transactions to serve as company reference when considering the acceptance of customers.

6. Training

The Company shall communicate and cascade the Anti-Money Laundering and Counter-Terrorist Financing and Proliferation of Weapons of Mass Destruction 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-Money Laundering and Counter-Terrorist Financing and Proliferation of Weapons of Mass Destruction 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 fully 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 Anti-Money Laundering Acts

10.2 Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing Acts

10.3 Whistleblowing Policy and Guidelines - Leadership Development Charoen Pokphand Group Co., Ltd.

10.4 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. **Money Laundering**

   The act of converting money or assets earned through illegal or dishonest means and attempting to make them legally usable.

2. **Terrorism**

   Any act which constitutes an offense related to terrorism under the Penal Code, or any act which constitutes an offense within the scope of international conventions and treaties related to terrorism, to which the country of operations is a party or acceded, whether such act is committed inside or outside the country.

3. **Weapons of Mass Destruction**

   Nuclear, biological, chemical or other weapons which cause serious harm to lives of human, animal, plant or environment similar to such weapons, including means of delivery, component or equipment of such weapons;

4. **Customer**

   A natural person or a juristic person or a legal arrangement who establishes a business relationship or conducts a transaction with the company.

5. **Transaction**

   An activity related to an entry into a juristic act, a contract or the execution of any act with others in financial or commercial matters, or the operation in connection with assets.

6. **Know Your Customer (KYC)**

   The process of collecting and assessing customers' data before the company engages with the customer in order to confirm their identity. The process can be separated into two parts:

1) Identification - Requesting customers' identification documents to check if the customer's identity, either as a person or juristic person, is recognized by law.
2) Verification - Validate the authenticity, correctness, and recency of identification documents.

7. Customer Due Diligence (CDD)

The process of assessing and verifying customer information prior to approving business relationships or transactions, such as cross-checking customer names with sanction lists related to money laundering and terrorism announced by local and international authorities, and company reference, etc. to prevent the company from being used as a channel for money laundering, terrorist financing, or the proliferation of weapons of mass destruction.

8. Business relationship

A transaction conducted between a customer and the company for the objectives of using financial, business, trading, or professional service of the company continuously or in an agreed period.

9. Suspicious transaction

A transaction with reasonable grounds to believe that it is conducted to avoid a legal offense related to Anti-Money Laundering Acts, or Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing Acts, or transaction connected or possibly connected with money laundering, terrorist financing or proliferation of weapons of mass destruction offenses, notwithstanding the transaction being single or multiple, and shall include an attempt to conduct such a transaction.