Whistleblowing

Policy and Guidelines

Leadership Development Charoen Pokphand Group Co., Ltd.

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Whistleblowing Policy and Guidelines

Leadership Development Charoen Pokphand Group Co., Ltd.

1. Intent

Leadership Development Charoen Pokphand Group Co., Ltd. recognizes that providing employees and external stakeholders with whistleblowing or complaint channels to report behavior that may lead to corruption or misconduct enables Leadership Development Charoen Pokphand Group Co., Ltd. to be vigilant of employee conduct. This ensures compliance with laws, company regulations, and the Code of Conduct. Whistleblowing or complaint channels also promote a speak-up culture within the company. An efficient whistleblowing and complaint process that comprises of receiving reports, verifying evidence, summarizing findings, protecting whistleblowers and relevant persons, is a vital mechanism in preventing misconduct, fraud and corruption, resulting in fair and transparent 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. Objectives

3.1 To provide employees and external stakeholders with guidelines for submitting whistleblowing reports or complaints if inappropriate activity or behavior, illegal conduct, or against company regulations is perceived.

3.2 To ensure that there is a whistleblowing management system that is conducted efficiently according to the standard process.

3.3 To protect whistleblowers or complainants from any unfair, negative effects, including harassment or retaliation.

4. Roles and Responsibilities

4.1 Board of Directors

4.1.1 Consider and approve the Whistleblowing Policy and Guidelines.

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

4.2 Management

4.2.1 Determine company regulations and measures for employees and stakeholders to comply.

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

4.2.3 Provide appropriate whistleblowing channels and processes.

4.2.4 Determine protection and remedial measures for whistleblowers or complainants.

4.2.5 Foster a Speak Up Culture.

4.2.6 Supervise, manage and promote the implementation of this policy and company regulations.

4.2.7 Consider whistleblowing or complaint results, in addition to determine areas for improvement.

4.2.8 Report progress to the responsible committee.

4.3 Responsible Department/Persons

4.3.1 Establish procedures and processes that comply with this Policy and Guidelines as well as company regulations.

4.3.2 Determine the scope of whistleblowing reports or complaints.

4.3.3 Promote awareness through communications and training in addition to providing advice to employees on complying with this policy.

4.3.4 Manage whistleblowing or complaints operations in line with company regulations and measures.

4.3.5 Report investigation findings to whistleblowers, complainants, defendants, and relevant management.

4.3.6 Collect and prepare progress reports for management.

4.3.7 Review whistleblowing or complaints operations according to the corresponding procedures.

4.3.8 Assess the efficiency of whistleblowing or complaint management process as well as determine areas for improvement.

4.4 Staff

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

4.4.2 Report to a supervisor or via designated channels if they have information and/or perceive the following suspected conduct:

(1) Any fraud and corruption

(2) Any acts that violate laws, company regulations and Code of Conduct

(3) Any human rights violations, discrimination, harassment, or unethical behavior.

4.4.3 Support with useful information that contributes to whistleblowing or complaints procedures.

5. Guidelines

5.1 Whistleblowers or complainants who disclosed their identity and provided facts will be protected and receive remediation according to the company manual. Whistleblower or complainant information will be kept extremely confidential.

5.2 When the investigation takes place, investigators should consider the sufficiency of facts and details given as required in the company manual for handling whistleblowing or complaints.

5.3 Investigators must be independent and must not have any conflicts of interest with whistleblowers or complainants as well as with grievances being reported.

5.4 Employees who are involved in the whistleblowing or complaint process are responsible for keeping the information confidential, except if it is required to be disclosed by law.

5.5 Whistleblowers or complainants, including connected persons, shall be protected from retaliation or unfair treatment as per the company manual.

5.6 Whistleblowers or complainant who report in good faith, as well as persons affected by the investigation process will be considered for remediation and alleviation from any damages through appropriate and fair measures.

6. Training

The Company shall communicate and cascade the Whistleblowing 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. Policy Guidance

If employees suspect any conduct that could be fraud or corruption, illegal or violate company regulations and the Code of Conduct, or any human rights violation, discrimination, harassment, and unethical behavior, employees can seek guidance from their supervisors, responsible departments or persons, the Compliance Department or Legal Department before carrying out any action.

8. Penalty

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.

If it is proven that the whistleblowing or complaint is filed with malicious intent, involves false information or with the purpose to cause harm or reputational damage to others or the organization, the person will be subjected to disciplinary or legal action.

9. Related Laws, Regulations, and Policies

9.1 Anti-corruption Acts

9.2 Anti-money laundering Acts

9.3 Counter-terrorist Financing and Proliferation of Weapons of Mass Destruction Acts

9.4 Anti-Fraud and Anti-Corruption Policy and Guidelines - Leadership Development Charoen Pokphand Group Co., Ltd.

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

9.6 Human Rights and Labor Practices Policy and Guidelines - Leadership Development Charoen Pokphand Group Co., Ltd.

9.7 Conflicts of Interest Policy and Guidelines - Leadership Development Charoen Pokphand Group Co., Ltd.

9.8 Personal Data Protection Policy and Guidelines - Leadership Development Charoen Pokphand Group Co., Ltd.