

Anti-Fraud and Corruption Policy

Thaifoods Group Public Company Limited ("the Company") operates under the principles of good corporate governance and places great importance on anti-corruption against corruption in all forms and levels. As a result, the anti-fraud and corruption policy has been established per anti-corruption rules, regulations, and laws. This policy requires directors, executives, and all employees to comply, which includes covering both domestic and foreign businesses, as well as all related agencies, and building confidence among all stakeholders that the Company conducts business with honesty, transparency, and accountability, while also supporting anti-fraud and corruption activities. As a result, a written anti-fraud and corruption policy has been created to serve as a clear, practical guideline for conducting business and developing the Company in terms of sustainability.

1. Definition

Fraud and corruption mean any action, whether in the form of giving, offering, promising to provide, granting, committing to give, demanding, or receiving any money, property, service, or other benefits, including receiving or inappropriately giving political contributions, cash, charitable donations, sponsorships, gifts or valuables, service fees, receptions, or other expenses to a public official, private entity, or responsible individual, whether directly or indirectly, to inappropriately restrain the person or entity from performing their duties, or to maintain or obtain business or gain or keep any other commercially inappropriate benefits. Exceptions shall apply to the laws, regulations, announcements, rules, local traditional practices, or commercial customs permitted.

Political contribution means providing money, property, or other privileges and/or supporting employees to participate in political events on behalf of the Company to assist a political party, politicians, or politically related persons, whether directly or indirectly, or to obtain special privileges, inappropriate benefits, or business advantages. Which excludes employees' participation in an event based on their rights and freedom.

A charitable contribution means donating money, material, or other benefits to an individual or legal entity that establishes hidden objectives such as philanthropic organizations, foundations, funds, etc.

Sponsorship means money given to or received from a customer, supplier, or business partner for the purpose to enhance the business, brand, or reputation of the Company for the benefit of building trade reliability and helping to strengthen business relationships as appropriate and suitable occasions arise.

Gifts, services, receptions, or any other benefits mean receiving or giving material, services, or any assistance, whether they are in the form of money, property, products, services, or vouchers, including food and beverage, a reception, any service arrangement, accommodation, and travel.

Facilitation fees mean expenses paid directly or indirectly to government officials to ensure that they act promptly to speed up procedures or actions leading to fraud and corruption.

Employing a government official means accepting a person who is a government official or government employee to work to use a relationship or inside information to facilitate benefits that cause corruption and conflicts of interest.

2. Scope and Enforcement

This policy applies to all directors, executives, and employees intending to combat fraud and corruption, conducting or accepting all procedures, direct or indirect fraud and corruption, and covering its subsidiaries. The Company additionally expects that suppliers, dealers, and other persons related to its business operations will support the application of this policy.

3. Role and Responsibilities

3.1 The Board of Directors has duties and responsibilities to formulate policies and monitor compliance to establish an effective anti-fraud and corruption support system, ensure the management realizes and places importance on anti-fraud and corruption, and embed it into the organization's culture.

3.2 The Audit Committee has duties and responsibilities to analyze the financial reporting system, internal control system, and internal audit system to ensure that they follow international standards in a concise, suitable, contemporary, and effective manner.

3.3 The Chief Executive Officer and Executives have duties and responsibilities to establish a promotion system, support anti-fraud and corruption policies, and communicate them to all employees and related parties. This involves reviewing the system's suitability and taking appropriate measures to comply with changes in business, rules, regulations, and legal requirements.

3.4 The Internal Audit Manager has duties and responsibilities to audit and review the operations of all departments within the Company following with the Company policy, guidelines, operational authority, regulations, laws, and department requirements to ensure that the Company has established an internal control system that is suitable and adequate to mitigate potential fraud and corruption risks and report findings to the Audit Committee.

3.5 Employees at all levels have duties and responsibilities to comply with policies, guidelines, regulations, laws, and anti-fraud and corruption measures.

4. Anti-Fraud and Corruption Policy

The Company would not **tolerate any fraud or corruption**. The directors, executives, and employees are prohibited from engaging in action or submission of fraud and corruption, whether directly or indirectly, or for the profit of an individual, family, friend, or acquaintance, by requiring strict adherence to the anti-fraud and corruption policy and determining to review its anti-fraud and corruption policy regularly. In addition, the practice following any rules and regulations must be revised to be in line with changes in business and relevant laws.

- 1) Directors, executives, and employees are barred from exercising or omitting to exercise any duty or exercising their obligation wrongfully, a violation of the law and ethics, in order to procure an advantage to which they are not allowed in various forms, such as demanding, accepting, or offering a property, including other benefits to a government official or any other person doing business with the Company, etc.
- 2) Establish a principle relating to the giving or receiving gifts or entertainment as a part of the business code of conduct. An employee must not offer, demand, receive, or agree to receive money, materials, meals, or any other various entertainment or benefits that may raise suspicion of bribery and corruption behavior. If a gift is received, it should be reasonable and not be in the form of cash or cash equivalents. It should be comprehended that any action or inaction must be transparent and accountable.
- 3) Establish procurement regulations, the objectives of the transaction, payment, or any contract, in which each step must have clear supporting evidence and have appropriate approval authority for each level.
- 4) The Company does not have a policy of facilitating payments in exchange for conducting business in a manner that violates the law and encourages fraud and corruption behavior.
- 5) The Company must supervise the recruitment of personnel, such as the selection process, hiring approval, remuneration, and control processes, to ensure that the Company does not employ government employees to use relationships or inside information to facilitate benefits that cause fraud, corruption, and conflicts of interest. However, employment with the Company cannot be in return for receiving any benefits or making contributions to the Company's benefits that can damage its image of reliability and honestly exercising their duty, which maintains fraud and corruption risk.
- 6) Communicate anti-fraud and corruption policies to all levels of the Company through various networks such as employee training, notification via the public relations board, company website, intranet website, annual report, or other channels to raise awareness among relevant personnel and implement the policy.
- 7) Provide various whistleblowing channels for employees and stakeholders to report any suspicious clues that may suggest wrongdoing. In this regard, whistleblower protection should strictly protect the whistleblower so that they will not face punishment or unfair transfers. Furthermore, a person should be appointed to check and track each reported clue.
- 8) Develop anti-fraud and corruption measures in accordance with applicable laws, morals, and codes of conduct by conducting risk assessments for activities that are related to or at risk of fraud and corruption and putting the necessary preventative measures in place reasonably, as well as scheduling internal communications on a regular basis.

5. Human Resource Management

The Company has managed human resources to effectively support adherence to anti-fraud and corruption policies and prevent fraud and corruption according to these policies.

The Company will not demote, punish, or provide a negative review to employees who refuse corruption, even if such behavior can lead to the Company losing business opportunities.

6. Communication and Disclosure of Policies

The Company disseminates, discloses, and educates on anti-fraud and corruption policies, guidelines, or measures for directors, executives, employees, and individuals with legal relations with the corporation or public to appropriately know through various channels such as employee training, notification via the public relations board, company website, intranet website, annual report, or other networks to ensure that the Company is free from fraud and corruption, including honest, transparent, and accountable operations.

7. Punishment

If directors, executives, and employees of the Company fail to comply with the anti-fraud and corruption policy, the Company will consider appropriate punishment, including termination of employment under the Company's work regulations as well as taking legal action when necessary due to damage done to the Company.

8. Policy Review and Improvement

The Company requires this policy to be reviewed regularly, at least every year or when significant changes occur, to be consistent with the Company's operations.

Announcement on January 1st, 2026