

Code of Conduct Guidance

Moral Value Quality

About code of conduct

Ethics of Thai Foods Group means good practices in doing business by complying laws, rules and regulations of government agencies that Includes respect for the rights of partners and customers. This is for employees of Thai Foods Group PLC to use as guidelines as a part of the employees' practices

Employees of Thai Foods PLC has a duty to follow the principles as defined in this Code of Conduct. Directors should be good examples according to this code of conduct.

Guideline of this code of conduct

☒ Understand the code of conduct especially the subjects about their duties and responsibilities

☒ If there is any issue about compliance with the code of conduct, employees can consult each team leader, inquire the organizer of the code of conduct or ask through the consulting system of Thai Foods Group.

☒ Practice yourself as a good example and communicate with others about the acknowledgement of ethics

☒ Inform clues that are contrary to the Code of Conduct via designated channels and cooperation in investigations for facts finding

Non-compliance with the code of conduct

☒ Failure to comply may be a disciplinary offense according to regulations or laws and brought into a punishment according to a company's criteria or laws.

☒ Actions which are considered as non-compliance with the code of conduct include supporting or ignoring when oneself oversees those actions, hinders the investigation process of facts finding or do any unfair actions against whistleblowers.

Basic principles according to the code of conduct

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|---------|---|
| Moral | <ul style="list-style-type: none">• Compliance with laws• Anti-corruption• Receiving gifts and entertainment• Donations and supporting money• Conflicts of interest• Treatment of information, property and intellectual property• Fair trade competition |
| Value | <ul style="list-style-type: none">• Human rights• Labor standards• Political action• Communication |
| Quality | <ul style="list-style-type: none">• Environmental care• Workplace health and safety• Food safety |
| Penalty | <ul style="list-style-type: none">• Penalty |

Guideline when wrongful actions have been found

In the case of finding the resistant of the code conduct. Thai Foods Group PLC has a system for receiving complaints and a clue notification system which covers the protection of informants as follow:

Report complaints according to channels

- ☒ The website of the group of companies according to the complaint receiving and clue system (www.tfg.co.th)
- ☒ E-mail
- ☒ Letter
- ☒ Verbalization
- ☒ Information card

Complaint recipients

- ☒ Chairman of the Board of Directors
- ☒ Chairman of the Audit Committee
- ☒ Corporate Governance Committee Secretary
- ☒ Top management of internal audit department
- ☒ Top management of compliance department
- ☒ Top management of Human resources department
- ☒ Trusted supervisors

Collect facts according to the complaint receipt policy.

Set up a committee for investigation

Summary of results and reports as appropriate

- ☒ Corporate Governance Committee
- ☒ Board of Directors
- ☒ Audit Committee

CORPORATE COMPLIANCE POLICY

“Obeying the laws, regulation and standards is the foundation.”

Compliance Policy to comply with laws and regulations

Thai Foods Group operates businesses both in the country and abroad. There are local and international employees; therefore, the business operation of Thai Foods Group PLC must be related to the laws of every country that the company has operated strictly

Policy

For durability of the business, Thai Foods Group PLC complies with laws either local or international laws for preventing lawsuits, prosecutions and also gaining a good image

Guideline

- Strictly follow the rules and regulations that are required by law, such as environmental laws and Bribery law
- Use cautions in legal proceeding; if in doubt, ask the department that has responsibility
- If Anyone witnesses illegal actions; he must report to the supervisor and cooperate in the investigation.

ANTI-CORRUPTION

**“No give – No take,
The way to fight corruption.”**

Anti-Corruption

Thai Foods Group focuses on anti-corruption and bribery includes any action which is inflicted upon corruption. The main objectives are they are practical and concrete.

Policy

Thai Foods Group employees at all levels comply with the rules, regulations and laws relating to anti-corruption strictly for creating confident to all stakeholders which Thai Foods Group PLC operates business with integrity, transparent and verifiable. Moreover the company supports many activities in opposition to corruption.

Guideline

- Do not commit corruption and use carefulness with activities which are at risk of corruption such as purchasing, hiring, contacting government agencies
- If Anyone witnesses illegal actions; he must report to the supervisor and cooperate in the investigation.

GIFTS AND ENTERTAINMENT

“No Gifts – No Corruption”

Receiving any items or benefits must be as specified by the company's definition, tradition, practice in each locality and laws. The value must be appropriate and do not motivate any wrongful actions.

Policy

Thai Foods Group PLC determines the policy for receiving gifts and entertainment for creating good standards in the operation to be clear, transparent and effective.

Guideline

- Receiving gifts or entertainment related to business, employees must follow the company's procedure about the value and must notify a supervisor.
- Do not accepting any gifts or entertainment that affect the decision to perform the duties wrongfully

CONFLICT OF INTEREST

“Avoid Situation – Report”

The practice of Thai Foods Group is based on accuracy according to law and ethics by avoiding acts which can cause conflict of interest.

Definition of "conflict of interest"

is actions that employees have personal interests which may affect decisions in performing their duties whether directly or indirectly

Guideline

- Report items that may cause conflict of interest
- Do not act in conflict between works under responsibilities and personal reasons, such as abstaining

INFORMATION ASSETS AND INTELLECTUAL PROPERTY

“Appropriate use and protect”

The focus is to keep information to be accurate and complete and to give priority to protection of information and assets. They must not be disclosed against laws. Moreover, the use of assets and intellectual property of the company should be effective, in order to prevent loss, damage or use of property for personal benefit.

Definition of "important information"

Information about the operation of the Thai Foods group PLC that if it is disclosed, it may cause significant impacts.

Guideline

- Record and report legal information following laws such as, tax laws Securities and Stock Exchange Law
- Keep documents in a safe and appropriate method, divided by level of Importance
- The company determines who is responsible for maintaining company information. The disclose of information must comply with the company requirements and do not violate the legal rights
- Do not use internal information that has not been disclosed to the public for oneself or for the person they know for purchase/sell securities which is characterized by taking advantage of outsider

FAIR COMPETITION

“Antitrust”

Fair trade competition is governed by the Trade Competition Act, concerning anti-monopoly, reducing or limiting competition in trade. The purpose is to create a suitable trade competition, resulting in an economic stimulus and the country can perform effectively for the best benefit to people.

Definition of "Monopoly"

The pricing and product conditions are unfair or not reasonable. Also, there is intervention in the business of others without any justifiable reason.

Guideline

- If there is any doubt about the Trade Competition Act, send enquiries to professionals.
- Do not discuss price plans, sales or production plans with competitors.
- Do not agree to share benefits between competitors such as price, sale's areas

HUMAN RIGHT

“Regardless without Discrimination”

Thai Foods Group PLC treats each other equally. The company respects human rights without discrimination due to differences in physical, nationality, religion, gender, age, skin color, education or other status according to laws, including performing duties with carefulness to prevent human rights violations.

Definition of "human rights"

Basic rights of human in being treated equally without discrimination because of differences such as, physical, nationality, religion, gender, age, skin color, education or other status according to laws.

Guideline

- Promote operations in term of protecting human rights through policies such as Compliance policy, the Code of conduct, Corporate Social Responsibility Policy
- Receive complaints and protect the complainants by Investigating under fair labor practices

Labor Standards

“Employee Value Creation”

Thai Foods Group PLC sees the value in every employee and therefore treats the employees equally without discrimination under relevant rules, regulations and laws for supervising and protecting the quality of working environment.

Definition of "Labor Standards"

The protection of equality related to employment such as, working hours, holidays and work safety. The company produces quality of life with safety, Good relationship and inspiration in working.

Guideline

- Implement fair labor practices; such as, recruiting employees, working hours, hiring child labors
- Train employees to ensure that the policy is being implemented effective and appropriate

Political Activity

“Respect employee rights”

Thai Foods Group PLC does not concentrate or support political parties, both in finance and other forms, whether directly or indirectly. However, the company respects personal rights of employees.

Principles

Thai Foods Group is politically neutral.

Guideline

- Expressing politics on its own behalf and do not confused or mistaken for being act on behalf of the company
- Do not wear staff uniforms or use company’s symbols that other people could understand that the company participate in political activities

Communication

“Relation and Creation”

Thai Foods Group PLC encourages communication, dissemination of knowledge, understanding, guidelines and any principles for the stakeholders of the company. Therefore, they are able to participate in the practice and conduct business through the company's communication channels; such as, electronic mail, company website reports, the annual report or other reports

Principles

Opportunities for employees and outsiders to exchange opinions, transfer knowledges, properly deploy and brought to development

Guideline

- There is communication channels between the company and stakeholders (two-ways communication). For example, Employees and stakeholders are able to express their opinions, problem, report clues or report complaints in the event of any incident or actions against violations of human rights policies, the complaint should be under proper protection and there are methods of punishment according to company regulations.

Environmental Standards

“Reduce environmental impact”

Thai Foods Group PLC recognizes the environment in the production process and takes care of the health and safety in the workplace for reducing the risk that may occur at workplaces and creating awareness of environmental care, health and safety.

Principles

The company always has to gain permissions before conducting any business activities, the company must comply with environmental laws throughout every period of operations.

Guidelines

- Support the use of technologies that reduce environmental impacts
- Use resources efficiently to reduce the impact on the environment
- Manage the environment both Internal and external, especially the nearby areas
- Disclose environmental information through the channels of Thai Foods Group PLC.
- Listen to the opinions of stakeholders in communities around the workplaces.
- Create awareness of environmental care for employees such as training, exchanging comment or doing social activities

Safety and Health

“Environment at workplaces is free of violence and unlawful harassment”

Thai Foods Group PLC’s employees have the right to work in safe workplaces. Which free from physical hazards or any actions violating the law.

Examples of “Safety in workplaces”

The company will check the readiness of employees’ health, prevent accidents from working, and protect employees from sexually harassment

Guidelines

- Offer a health check to reduce the risk of health problems or work accidents.
 - Wear equipment for work safety and controlling by the supervisor
- In order to prevent the risk of accidents and take care of employees' health as appropriate for the job
- Disclose environmental information through communication channels.
 - Create awareness of accident prevention and health care in the workplace

Food Safety

“Quality food”

Thai Foods Group PLC produces safe food according to international standards. Therefore the company has been implemented to assure that Thai products are safe in accordance with international standards starting from production and also can be traced back.

"Quality Policy"

The company aims to produce quality and safe products, pay attention to customers, have continuous improvement, consist with the laws, follow the principles about safety, have an environmental concern, and focus with international standards and ethics

Guideline

- Produce products concerning the safety of consumer, If the formula is modified, the production methods must be approved by an authorized person with evidence for reference
- Able to trace back the products for investigation
- Report to the supervisor immediately when there is a concern about the safety of the product

Penalty

“non-compliance”

"In case of non-violent disobedience"

The wrongdoer will receive a written warning letter, specifying the disobedience and main reasons he will be provided the opportunity to dispute the allegation to the supervisor. If it is unable to solve the problem, the issue will be presented to the Disciplinary Committee which is set by the Chief Executive Officer to consider and make the final decision. The offense may be subject to strict disciplinary action, including termination.

"In case of serious violations"

Serious violation means the following actions:

- Providing or receiving bribes
- Fraud
- disclosing confidential information or Intellectual property of the company to other people
- Any action that degrading the honor of the company
- Concealing or not reporting information, or any important documents to supervisors

The company may consider terminating employment without paying compensation and not require issuing a written warning letter first.

Guideline

- understand especially matters relating to their duties and responsibilities
- If in doubt, consult the supervisor or inquire the ethics manager or ask through the consulting system of Thai Foods Group PLC
- Act as a good model and communicate to other people to acknowledge the ethics
- Report clues when finding actions that are contrary to ethics and cooperate in investigations for facts finding