



Policies and Guidelines on Gifts, Entertainment and Hospitality

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Policy and Guidelines on Gift, Entertainment and Hospitality

1. Objective of Policy and Guidelines

This document is written to supplement the Anti-Bribery and Anti-Corruption Policy, to ensure that Charoen Pokphand Group (C.P. Group) operates with honesty and transparency, as well as safeguarding all stakeholders' rights while not violating any laws and regulations in all countries of operations.

2. Policy and Guidelines

All employees should refrain from giving and receiving gifts, entertainment, or any other benefits for persons within C.P. Group as well as third parties, particularly state officials.

Consider the following criteria:

- 2.1. The benefit in question, whether giving or receiving, must be for an appropriate purpose, with no inappropriate intention to influence the decisions of the recipient.
- 2.2. The benefit in question, whether giving or receiving, must not violate the laws of the respective country where C.P. Group is operating.
- 2.3. The benefit in question, whether giving or receiving, must not violate the policies and procedures of C.P. Group.
- 2.4. The benefit in question, whether giving or receiving, must not conflict with the policies of the recipient's company.
- 2.5. The benefit in question must be reasonably priced and appropriate for the occasion.

3. Guidelines

3.1. Giving or receiving gifts

3.1.1. Comply with the criteria described in 2.1 to 2.5.

3.1.2. Employees are prohibited from giving gifts to relatives of state officials, including outside working hours. Exceptions include

items that are legal by law, or appropriate in the performance of duties.

3.1.3. Employees should inform business partners, as well as goods and services providers to be aware of these procedures.

3.1.4. Employees shall write a note to their supervisors, in lieu of relatives receiving gifts from business partners, customers and competitors of the Group.

3.1.5. The total value of the gift in question must not exceed the maximum threshold according to the laws of the recipient's country of residence.

3.2. Entertainment

3.2.1. Comply with the criteria described in 2.1 to 2.5.

3.2.2. Entertainment and related activities are allowed as long as it follows conventional business practices.

3.2.3. Avoid arranging or accepting entertainments during business opportunities, negotiations and biddings currently taking place or may be taking place in the future.

3.2.4. Employees require approval from their supervisor prior to arranging or accepting entertainments.

3.2.5. Employees are prohibited from providing entertainment to relatives of state officials, including outside working hours. Exceptions include entertainment that is legal by law, or appropriate in the performance of duties.

3.3. Facilitation Payments

3.3.1. C.P. Group prohibits the making of facilitating or expediting payments, both directly and indirectly, under any circumstances. This includes facilitation payments that are made under conventional business practices and payments to a third-party, in particular expediting payments made to state officials.

3.3.2. Employees should inform business partners, as well as goods and services providers and state officials to be aware C.P. Group's stance on facilitation payments.

- 3.3.3. Find alternatives or workarounds to eliminate the need for facilitation payments.
- 3.3.4. Employees likely to encounter risks of facilitation payments must complete additional training or ask for guidance on how to deal with these payments.
- 3.3.5. If in a situation that there is no workaround or that facilitation payment is unavoidable, inform employees should inform their supervisor in order to agree to a solution.

3.4. Travelling and Hospitality Expenses

- 3.4.1. Comply with the criteria described in 2.1 to 2.5.
- 3.4.2. Record the purpose of travel/hospitality, travel/hospitality details, length of travel/stay, estimated budget, names of the traveler, and present to the relevant supervisor for approval.
- 3.4.3. Maintain receipt and all supporting documents related to travelling/hospitality expense for future inspection.
- 3.4.4. The payment and reimbursement of travelling/hospitality expense must be held on the basis of good faith, and approved by the relevant supervisor in advance.

3.5. Charitable Donations and Contributions

- 3.5.1. Comply with the criteria described in 2.1 to 2.5.
- 3.5.2. Donation or contribution is made to legal organizations, and not to any individual persons.
- 3.5.3. Donation or contribution is not a part of an obligation of payment.
- 3.5.4. Record the name of the recipient, reason for the donation/contribution, and present to the relevant supervisor for approval.
- 3.5.5. All documents involved in the payment process are stored, to ensure that donations are not disguised illegal payments or others in violation of anti-corruption laws.
- 3.5.6. Maintain receipt or proof of payment for future inspection.
- 3.5.7. A list of sponsored organizations, foundations and other recipients is published publically on an annual basis.

4. Training

C.P. Group shall provide a training workshop to ensure that directors, management and employees understand the contents included in this procedures and guidance, as well as being able to apply them in the workplace.

5. Related policies

5.1. Anti-Bribery and Anti-Corruption Policy

5.2. Procedures and Guidance on Giving and Receiving Gifts and Souvenirs in New Year's Festival and All Occasions

6. Review of Procedures and Guidance

The Corporate Governance, Compliance, Internal Audit and Human Resources Department shall review this policy at least once a year.