



Tipco Foods Group

Anti-Corruption Policy

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Introduction

The Company first issued an **announcement on the “Anti-Corruption Policy”** in 2019 to demonstrate its commitment to joining the Thai Private Sector Collective Action against Corruption (CAC) and to reaffirm its determination to conduct business with integrity. The announcement also encouraged employees at all levels to be aware of and actively engage in preventing all forms of corruption. The Policy was subsequently revised and reannounced in 2022 and 2024.

To enhance clarity and ensure alignment with international standards, the Company has now developed this **comprehensive Policy**, consolidating the principles, practices, and measures from the earlier announcements and expanding the content to provide a more complete framework for employees, management, and all stakeholders.

In addition, matters relating to the giving and receiving of gifts and gratuities have been issued as a **separate policy**. Other details, such as whistleblowing, complaint handling, and anti-corruption procedures, have been compiled into a **Code of Practice**, which should be read in conjunction with this Policy to ensure effective implementation.

Scope

This policy applies to directors, executives, employees at all levels, and staff of the Company, its subsidiaries, affiliates, and companies under their control, as well as any people acting for or on behalf of the Tipco Food Business Group. All such people are required to comply strictly with this policy. In addition, the Company expects its business partners, distributors, and other parties related to its business operations to support the implementation of this policy.

Definitions

- **The Company** refers to the Tipco Food Business Group, consisting of Tipco Foods Public Company Limited and its subsidiaries.
- **Employee** refers to any person engaged under an employment contract or a special service contract with the Company.

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- **Corruption** refers to any act undertaken to gain undue benefits unlawfully for oneself or others. This includes acts such as embezzlement, fraud, falsification of accounts, and corruption in all forms.
- **Embezzlement** refers to the dishonest appropriation of property belonging to another person, for oneself or a third party.
- **Fraud** refers to deceiving another person by concealment or by making false statements, thereby acquiring assets from the deceived person or a third party, or causing the deceived person or third party to create, withdraw, or destroy any legal documents.
- **Falsification of Accounts** refers to manipulating accounting figures by exploiting loopholes in accounting principles, valuation, or disclosure of accounting information to inappropriately alter financial statements.
- **Corruption (in practice)** refers to performing or refraining from performing one's duties, or abusing official authority in any form, including giving or receiving bribes, making offers, or promising to give, soliciting, or demanding property, money, items, rights, or other benefits that are contrary to morality, ethics, laws, regulations, or Company policies, whether involving government officials or any other parties doing business with the Company, domestically or internationally, to obtain undue benefits for the organization, oneself, or others. Exceptions may apply only in cases permitted by law, regulations, announcements, local customs, or commercial practices.
- **Political Contributions** refer to the provision of assets, money, items, rights, or any other benefits, such as assistance, support, or for the benefit of a political party, politician, or person with political duties, including political activities, whether directly or indirectly.
- **Bribery** refers to property or other benefits of value given to an individual or group to induce them to act, or refrain from acting, in a position of responsibility, whether such an act is lawful or unlawful, for the benefit of oneself or the Company's business.
- **Gifts or Gratuities** refer to items of value in the form of goods, products, or services, whether given or received directly, or offered at a special price, including hospitality or service expenses.

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- **Charitable Donation** refers to a donation made to government agencies or private organizations, including foundations or charitable institutions that are non-profit in nature. Such donations must not be intended to obtain or exchange direct marketing or publicity advantages.
- **Public Benefit Donation** refers to expenditures made for the benefit of communities, society, or groups of people, where the Company may not receive tangible returns.
- **Sponsorship** refers to financial support provided for business, brand, or reputation purposes.
- **Facilitation Payment** refers to unofficial payments made to government officials to expedite processes or to encourage them to perform duties that the Company is already legally entitled to, and which are part of the officials' legitimate responsibilities.
- **Stakeholders in the Company** refer to individuals directly involved in the Company's operations or having a direct stake, including management (the Board of Directors, senior executives, department heads, and supervisors), employees, major shareholders, and related parties.
- **Related Parties** refer to spouses, children, parents, siblings, or close relatives of directors, executives, and employees at all levels of the Company.
- **Hiring Government Employees** refers to situations where government officials are employed by the Company, or Company-related persons who hold policymaking roles in government agencies, creating risks of corruption due to conflicts of interest, such as government officials failing to act impartially or Company-related people pushing for state policies that benefit the Company.
- **Government Officials** refer to people authorized to perform duties on behalf of the state or state agencies, including civil servants, employees, staff of public organizations, state enterprise employees, and political officeholders, as well as retired officials, their families, or relatives, where such connections may lead to preferential treatment.

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Policy

The Company's directors, executives, employees at all levels, and related parties shall strictly refrain from engaging in any form of corruption, whether directly or indirectly, under any circumstances. The Company shall establish measures to review and monitor compliance with this Anti-Corruption Policy on a regular basis to ensure alignment with business changes, regulations, rules, and legal requirements. Any violation or action supporting corruption shall be subject to disciplinary action in accordance with the Company's regulations.

Roles and Responsibilities

- **The Board of Directors:** Responsible for defining the policy and overseeing the establishment of systems that effectively support anti-corruption efforts, ensuring that management is aware of and prioritizes anti-corruption, embedding it into the organizational culture.
- **The Sustainable Development and Corporate Governance Committee:** Responsible for defining principles and key practices related to sustainable development and good corporate governance, fostering understanding among directors, executives, and employees, and promoting alignment of the Company's operations with these principles and practices.
- **The Audit Committee:** Responsible for reviewing financial reporting and accounting systems, internal controls, internal audit, and risk management systems to ensure compliance with international standards, appropriateness, effectiveness, and modernity. It also ensures that operations are carried out correctly, in accordance with rules, procedures, and laws, thereby providing adequate controls against potential fraud and corruption risks.
- **The Anti-Corruption Working Team:** Responsible for planning, reviewing, monitoring, and evaluating anti-corruption activities, as well as investigating any complaints or whistleblowing related to corruption.
- **Executives:** Responsible for establishing systems that promote and support the Anti-Corruption Policy, communicating it to employees, related parties, business partners, and

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stakeholders, and ensuring its continuous alignment with changing business conditions, regulations, and legal requirements.

- **Internal Audit (including external consultants, where engaged):** Responsible for auditing and reviewing compliance with policies, procedures, delegated authority, regulations, laws, and requirements of regulators, to ensure sufficient controls against corruption risks. Reports are to be submitted to the Audit Committee.
- **Employees:** Responsible for understanding and complying with the Anti-Corruption Policy and related practices. In cases of doubt or upon discovering any violations, employees must report them to their supervisors or through the Company's designated whistleblowing channels.

Principles

Directors, executives, employees, staff, and any person acting for the benefit of the Company must comply with the following principles:

1. Comply with the Anti-Corruption Policy, the Business Code of Conduct, as well as the Company's rules and regulations, and refrain from any involvement in corruption in any form, whether directly or indirectly.
2. Avoid any act that may indicate an intent to commit corruption, including the giving or receiving of bribes to stakeholders involved with the Company, whether directly or indirectly, to obtain benefits for the Company, oneself, or others.
3. Not ignore or disregard any suspected acts of corruption related to the Company and must report such matters to supervisors or responsible people and cooperate in fact-finding investigations.

Guidelines / Measures

1. The Company appoints the Anti-Corruption Working Committee to establish policies and measures consistent with the requirements of the Thai Private Sector Collective Action against Corruption (CAC).

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2. The Company establishes plans to encourage cooperation in preventing and combating corruption internally, including reviewing policies, auditing compliance with anti-corruption measures, monitoring, evaluating performance, and reporting findings to senior management and the Board of Directors.
3. The Company conducts corruption risk assessments and establishes preventive measures for operational control, environmental control, financial and accounting control, and document retention.
4. The Company remains politically neutral and has no policy of providing financial resources or other support, either directly or indirectly, to politicians or political parties.
5. The Company conducts procurement and business dealings with government and private sectors, both domestic and international, with transparency, honesty, and compliance with applicable laws, and does not support facilitation payments of any kind.
6. Hiring government officials as directors, executives, employees, or consultants of the Company must undergo proper selection, approval, remuneration, and control processes to ensure it is not in exchange for undue benefits.
7. The Company maintains HR processes in recruitment, performance evaluation, remuneration, and promotion that reflect its commitment to anti-corruption.
8. The Company shall not demote, penalize, or treat employees unfairly for refusing to engage in corruption, and shall protect employees or others who report corruption in accordance with the Whistleblowing Policy (CH0-04).
9. The Company communicates its Anti-Corruption Policy and practices to subsidiaries, affiliates, controlled entities, customers, partners, business alliances, stakeholders, and the public through various communication channels.
10. The Company maintains specific practices concerning gifts, gratuities, entertainment, and charitable donations, as outlined in the "No Gift Policy."
11. Any sponsorship, whether in the form of cash, goods, or assets, provided for events or projects, must be in the name of the Company, with clear objectives to promote business

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and reputation, carried out transparently and legally in accordance with Company procedures.

- Implementation of this policy must comply with the Company's Good Corporate Governance and Business Code of Conduct, as well as related rules, policies, regulations, requirements, and practices.

Whistleblowing/Complaints

Reports shall be made in accordance with the Whistleblowing and Anti-Corruption Complaint Procedures (CH0-04) and the Anti-Corruption Procedures (CH0-05).

Protection Measures for Whistleblowers and Refusal of Corruption

The Company shall protect in line with the Whistleblowing and Anti-Corruption Complaint Procedures (CH0-04) and the Anti-Corruption Procedures (CH0-05).

Disciplinary Actions

- Any person who intentionally or negligently fails to comply with this policy, including engaging in retaliatory acts such as harassment, intimidation, disciplinary punishment, or unfair treatment against whistleblowers or those involved in related processes, shall be deemed to have committed a disciplinary offense. Such people shall be subject to penalties under the Company's work rules and shall be held responsible for any damage caused to the Company or affected persons.
- In cases where related parties, customers, partners, or business alliances fail to comply with the Company's anti-corruption measures, the Company may consider terminating any business transactions with such parties.

Communication of Policy

To ensure awareness among all employees and related parties, the Company shall:

- Post the Anti-Corruption Policy on the Company bulletin boards at all locations.
- Disseminate the Anti-Corruption Policy through Company communication channels, such as e-mail, the Company's website, the One Report (Form 56-1), and brochures.

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3. Provide Anti-Corruption Policy training for new employees and include it in the Employee Handbook.
4. Require suppliers to sign and acknowledge the Supplier Code of Conduct.

Policy Review

This policy shall be reviewed annually, or when changes occur, and submitted to the Board of Directors for approval.

This policy was approved at the Board of Directors' Meeting No. 7/2568 (2025), held on 14 August 2025, and has become effective on the same date.