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บริษัท เชียงใหม่ฟรอสเซ่นฟู๊ดส์ จำกัด (มหาชน)

149/34 ซอยแองโกลพลาซ่า ถนนสุรวงศ์ แขวงสุริยวงศ์ เขตบางรัก กรุงเทพฯ 10500

CHIANGMAI FROZEN FOODS PUBLIC COMPANY LIMITED.

149/34 Soi Anglo Plaza Surawongse Rd., Suriyawongse, Bangrak, Bangkok 10500 Thailand

Tel : (662) 634-0061-4, 238-4091 Fax ; (662) 238-4090

Anti-corruption Policy

Chiangmai Frozen Foods Public Company Limited

The Company has an ideology of conducting business with integrity. Comply with Thai laws to combat corruption and corruption. Be transparent and adhere to social responsibility and all groups of stakeholders. In accordance with the principles of corporate governance and business ethics. The Company was certified as a member of the Thai Private Sector Collective Action Coalition Against Corruption (CAC) on March 9, 2017 and as a member of the CAC program for the fourth consecutive term on December 31, 2025.

In order to build confidence and lead to concrete action. Therefore, the Company has established its responsibilities. Appropriate Practices and Requirements In order to prevent fraud and corruption in all activities of the Company and to ensure that business decisions that may be at risk of fraud and corruption are carefully considered and implemented, the Company has prepared a written "Anti-Corruption Policy" to serve as a clear guideline for business operations and to develop into a sustainable organization.

Definition

Corruption refers to the misuse of one's position or authority or the misuse of existing assets. Bribery in any form by offering, promising, giving, committing, demanding or receiving money, property or any other unwarranted benefit for one's own benefit. Family, friends, acquaintances with government agencies, private agencies, or related persons. Either directly or indirectly, so that the agency or person Acting or omitting to perform duties in accordance with the prescribed principles in order to obtain or maintain any other benefits that are not suitable for business, except in cases where laws, regulations, announcements, regulations, customs, etc. local traditions or commercial customs.

The Company means Chiangmai Frozen Foods Public Company Limited.

Affiliates means subsidiaries of Chiangmai Frozen Foods Public Company Limited.

Employee means an employee of Chiangmai Frozen Foods Public Company Limited and an employee of its affiliates.

Anti-Corruption Policy

Prohibition of directors Executives and employees of the Company and its affiliates commit any act related to all forms of fraud and corruption, both for their own benefit. Family, friends, and acquaintances, whether directly or indirectly, whether they are in the position of recipients, givers, or offerors, whether monetary or non-monetary, to government agencies or private agencies with whom the Company operates or deals with them, must strictly comply with the policy. Failure to comply will be considered for disciplinary action according to the company's regulations, and may be punished according to the law if the act is illegal.

Responsibilities

- 1) The Board of Directors and senior executives have the authority and responsibility to formulate policies. Guidelines and procedures and support the implementation of various measures to ensure that the Board of Directors and



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senior executives The company has truly recognized and attached importance to such measures and instilled them into practice as the culture of the organization.

- 2) The Audit Committee has the duty and responsibility to review the financial and accounting reporting system. Internal control system, internal audit system, and risk management system to ensure that all systems are concise and appropriate. The Company is responsible for supervising the compliance with anti-corruption policies and measures.
Ensure that the Company has complied with the law, business ethics and corporate governance policies set forth.
- 3) The Risk Management Committee has the duty and responsibility to conduct a risk assessment related to corruption and review appropriate measures.
- 4) Managing Director and/or Senior Executives The Company has the duty and responsibility to provide a system to promote and support the Anti-Corruption Policy to communicate to customers, business partners, creditors, related agencies, as well as subsidiaries, associates, other companies under the Company's control and business representatives. Review the suitability of the system and measures to comply with business changes. Regulations, regulations and legal requirements, and prepare a report on the results of the audit in accordance with anti-corruption measures to the Board of Directors. Audit Committee and Corporate Governance Committee on a regular basis.
- 5) The Internal Audit Department has duties and responsibilities. In auditing and reviewing the performance to ensure that it is accurate and in accordance with the policy. Guidelines and procedures, authority to implement Procedures Laws and regulations of regulatory agencies to ensure that the anti-corruption policy is in place. There is an appropriate and adequate control system for potential fraud and corruption risks and report the results to the Audit Committee. Managing Director and/or Senior Executives

Anti-Corruption Guidelines

1) Gifts & Reception

Guidelines

- 1) Director Executives and employees shall not commit any act that shows that they are accepting bribes or bribes to stakeholders for which they are directly or indirectly responsible for obtaining improper benefits. By doing the following:
 - 1.1) Do not accept gifts, souvenirs in the form of cash, cheques, bonds, stocks, gold, gems, real estate, or similar items from related parties that they have contacted and coordinated with both government agencies and private agencies that are beneficial to the person or themselves or cause damage to the Company.
 - 1.2) Do not accept any property, goods, gifts, gifts, or any other benefits that induce them to neglect to perform their duties.



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- 1.3) Before receiving souvenirs, you should make sure that you comply with the laws and regulations of the company. Items or gifts given to each other in their duties should be inexpensive and appropriate for each occasion.
 - 1.4) Do not give any property, goods, gifts, or gifts or other benefits to incentivize decision-making, or result in the recipient not complying with the same trade practices as other business partners.
 - 1.5) However, the giving of items according to various occasions or agendas must not be of value to the extent that it is unusual.
 - 1.6) It is not an intermediary to offer money, property, goods or any other benefits to persons related to the business. Government agencies or private agencies in exchange for privileges that should not be obtained, or make government or private officials Ignoring the rules Regulations, regulations, and legal practices as prescribed.
- 2) Procurement, procurement, and contracting must be carried out through procedures in accordance with the company's regulations. It is transparent and verifiable.
 - 3) Expenses for business hospitality and other expenses related to the performance of business contracts can be made, but reasonable expenditures can be audited.

2) Charitable Donations

- 1) The use of money or assets of the Company and its affiliates for charitable donations must be done on behalf of the Company only. By making a charitable donation, the recipient must be a foundation. Public charitable organizations, temples, hospitals. Educational institutions or organizations for the benefit of society that are certified or reliable and verifiable. It is carried out through procedures in accordance with the Company's regulations and approved by the authorized person.
- 2) Charitable donations in the name of a person may be made but must not be related to or suspect that they are fraudulent. In the hope of any benefit.

Guidelines

- 2.1) The donation must prove that the project is indeed for charity and is carried out to support the achievement of the project's objectives and bring real benefits to society, or to meet the objectives of the social responsibility operation.
- 2.2) The donation must be proven to be for such charity. It has nothing to do with the benefits of remuneration to any person or agency, except Honoring according to general customs, such as wearing a badge Announcement of the name of the company at the venue or in various media for public relations, etc.



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3) Sponsorship

Providing money or assets of the Company and its affiliates to support the project. Names must be provided on behalf of the company and its affiliates only. The subsidies paid must be for business purposes. Disbursements must state clear objectives and verifiable evidence and be carried out through procedures in accordance with the Company's regulations.

Guidelines

1. The grant must prove that the applicant has actually carried out activities under the project and is an operation to support the achievement of the objectives of the project and bring real benefits to society or to meet the objectives of the socially responsible operation.
2. The grant must prove that the grant or any other benefit that can be calculated in monetary terms, such as providing accommodation and food, etc. It has nothing to do with the benefits of remuneration to any person or entity, except for the announcement of honors in accordance with general business customs. To become a grantee, a memorandum of application is required. Specify the name of the beneficiary and the purpose of the support and attach all supporting documents to be submitted to the competent authority for approval according to the Company's approval authority.

Do not commit any act related to politics and do not use any of the Company's resources to carry out such activities. The company is an organization that adheres to political neutrality. It supports the observance of the law and democratic governance, and there is no guideline for providing political assistance to any politician or political party, whether directly or indirectly.

4) Political support

Political Contributions refers to the provision of financial support. As well as encouraging employees to participate in political activities on behalf of the Company in order to gain a commercial business advantage. This does not include employees participating in activities based on their right to personal freedom, but they must not impersonate employees or use any of the Company's assets, equipment, and tools for political purposes.

Guidelines

The Company and its affiliates have an impartial business policy. Not politically inclined. The Company will not provide financial or material support to political parties. Politicians to provide political assistance according to the definition mentioned above.

- 1) Employees should not be neglected or ignored. When witnessing acts or behaviors that fall under the category of fraud and corruption, or imply corruption that directly or indirectly affect the Company. The employee must notify the supervisor.

The commander or the person in charge knows and cooperates in investigating various facts. If you have any doubts or questions, please consult your supervisor or the person designated by the Company through the designated channels.



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- 2) The Company provides fairness and protection to employees who deny corruption or employees who report fraud and corruption related to the Company by taking measures to protect complainants or those who cooperate in whistleblowing and reporting fraud and corruption as stipulated in the Company's confidentiality protection and confidentiality measures. The Company has a policy not to demote, punish or negatively affect the employee even if the rejection of fraud and corruption will cause the Company to lose business opportunities.
- 3) Fraud and corruption are acts that violate the Company's business ethics and corporate governance policies. They must be considered for disciplinary action in accordance with the regulations set by the Company and may be punished according to the law. If the act is illegal.
- 4) The Board of Directors and the Chief Executive Officer are aware of the importance of dissemination, knowledge, and advice. Consulting and understanding with personnel in the organization Related persons, as well as subsidiaries, associates, other companies that the Company has control over and business representatives regarding the implementation of anti-corruption measures so that personnel and related persons comply with this policy, as well as to be a good example of honesty, ethics and good morals.
- 5) The Company is committed to building and maintaining an organizational culture that adheres to corruption and corruption. Giving or accepting bribes is an unacceptable act. Whether it is an act against any person, whether it is the government or the private sector.
- 6) Anti-corruption policy to cover the personnel management process. Personnel selection, promotion, training, and performance evaluation of employees are required by requiring supervisors at all levels to communicate and understand employees for use in business activities under their responsibility and effectively supervise the practice.

5) **Convenience fee**

"Facilitation fee" means an informal expense given to a government official in the form of various forms of bribes, both paid in monetary form and other non-monetary benefits, to incentivize government officials to assist in facilitating various legal procedures related to the business activities of the Company or its affiliates to proceed quickly and without any problems.

Guidelines

The Company and its affiliates conduct their business with transparency and comply with the rules and procedures required by law and do not have a policy of paying convenience fees that may lead to corruption in any case.

6) **Hiring government officials**

"Government officials" refer to all types of public servants. Political Officials Holders of positions in independent organizations in accordance with the Constitution and shall include full-time and temporary employees of government agencies.

"Hiring" means the employment of labor in accordance with the Civil and Commercial Code.



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Guidelines

Company and Affiliates There is no policy to hire government officials as employees.

Matters that receive whistleblowing or complaints

- 1) Acts of corruption and corruption related to the organization, either directly or indirectly, such as seeing individuals in the organization, giving bribes or accepting bribes. Officials of government agencies or private agencies
- 2) Violations of the Company's regulations or affect the Company's internal control system that may be a channel for fraud and corruption.
- 3) Causing the Company to lose benefits or affect the Company's reputation.
- 4) Illegal acts, good morals, and business ethics of the Company.

A secure way to access information, receive advice, whistleblowing, or complaints.

- 1) A secure channel through which employees or stakeholders can access information with confidence. For advice on compliance with anti-corruption measures, please visit the Company's website at www.cmfrozen.com Click Investor Relations Click on topics you want to know about, such as the Anti-Corruption Policy. Business Ethics Corporate Governance and Sustainability Policy or other topics
- 2) A secure channel that employees or stakeholders can confidently access. When you want to make a complaint and report information or clues related to fraud and corruption without risk to the informant later. By submitting a complaint. Report information or clues by mail to

Chairman of the Audit Committee or Chairman of the Corporate Governance Committee, or
Company Secretary or Human Resources Department

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Or send by E-mail address: cg@cmfrozen.com

Or call 02-238-4091, 02-634-0061-4

- 3) In case the whistleblower or complainant has a complaint against the Chief Executive Officer. Executive Committee, Senior Executives Please send your complaint directly to the Chairman of the Audit Committee.
- 4) Persons who can report or complain about fraud and corruption are all groups of stakeholders of the Company, including shareholders, customers, business partners, competitors, creditors, and related agencies. Regardless of which method you notify the above, the Company will maintain confidentiality.



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Measures to protect whistleblowers or whistleblowers

- 1) In order to protect the rights of complainants and informants acting in good faith, the Company will conceal the name, address, or any information that can identify the complainant or informant and keep the information of the complainant and informant confidential.
- 2) In the event of a complaint against the Chief Executive Officer Executive Committee, Senior Executives The Audit Committee is responsible for receiving matters. Investigate the facts according to the complaint to report to the Board of Directors for joint consideration and imposition of penalties as deemed appropriate. If an offense is found according to the complaint and is obliged to protect the whistleblower. Complainant Witnesses and persons who provide information in the investigation to find out the facts. Not to suffer. Injustice or any harm caused by whistleblowing. Complaints Witnessing or providing information
- 3) The Chief Executive Officer is responsible for exercising his discretion and order as he deems appropriate to protect whistleblowers or complainants. Witnesses and persons who provide information in the investigation to find out the facts. Not to suffer. Any harm or impropriety caused by whistleblowing. Complaints Witnessing and providing information
- 4) The chief executive officer can delegate tasks to a particular executive. Acting on behalf of exercising discretion to protect the safety of whistleblowers or complainants. The assigned executive must not be directly or indirectly involved in the matter of whistleblowing or complaint (e.g., the accused is a direct subordinate to his/her own).
- 5) However, Persons who receive information from the performance of duties related to complaints. Responsible for data retention The complaint and the documentary evidence of the complainant and the informant shall be kept confidential. It is forbidden to disclose information to other persons who do not have relevant duties, except for disclosure in accordance with the duties prescribed by law.

Investigation Procedures and Penalties

- 1) When receiving a whistleblowing report Chief Executive Officer The Executive Committee and the Audit Committee will moderate. Investigate the facts.
- 2) During the investigation of the facts. Chief Executive Officer The Executive Committee and the Audit Committee may assign the Executive Committee to periodically notify the whistleblower or complainant of the progress of the progress.
- 3) If the investigation of the facts reveals that the information or evidence has reasonable grounds to believe that the accused person has actually committed fraud and corruption. The Company will grant the accused the right to be informed of the allegations and the right to prove himself/herself by seeking additional information or evidence to show that he or she is not involved in the alleged fraudulent and corrupt acts.
- 4) If the accused has actually committed fraud and corruption. Such actions are considered to be a violation of the Company's regulations. The accused shall be subject to disciplinary action in accordance with the rules set by the



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Company and may be punished according to the law. If the act is illegal. Disciplinary penalty: The decision of the Chief Executive Officer is final.

Five disciplinary penalties

- 1) Verbal reprimands by recording them in writing as evidence.
- 2) Written admonition
- 3) Written warnings and wage reductions or transfer of positions or not be considered for receiving bonuses.
- 4) Annual and/or not considered for annual wage increase, except for statutory wage adjustments.
- 5) Written warnings and unpaid suspension of work.
- 6) Dismissal and/or legal proceedings

Finding Urgent Issues

If fraud and corruption issues are found urgently, the Supervisor, Company Secretary or the Company's executives. Report on corruption and corruption issues to senior management and the Board of Directors without delay.

Dissemination of Anti-Corruption Policy

In order for customers, business partners, creditors, and related agencies Employees of the Company, as well as subsidiaries, associates, and other companies over which the Company has control over business representatives as well as the public. Acknowledged the Anti-Corruption Policy The Company will take the following actions:

- 1) The Company will disseminate the Anti-Fraud and Corruption Policy through the Company's communication channels such as the Company's website, email, fax, Annual Disclosure Report (Form 56-1), Social Responsibility Report, and Corporate Social Responsibility Report. Orientation, training, seminars, and mail
- 2) The Company will post an anti-corruption policy. In a conspicuous place and a director's manual has been prepared. executives and employees regarding anti-corruption measures. It is easily readable and accessible to all employees in the organization.
- 3) The Company will provide orientation, training, and seminars on the anti-corruption policy for all employees to be informed and implemented seriously.
- 4) The Company will regularly review the Anti-Corruption Policy on an annual basis.



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The Anti-Corruption Policy was approved by the Board of Directors' Meeting No. 1/2015 on February 26, 2015 and reviewed by the Board of Directors meeting every year. The most recent meeting of the Board of Directors No. 1/2026 was held on February 26, 2026.

Your Faithfully,

(Mr. Prayoon Pholpipattanaphong)

Chairman

The document information is translated from the Thai version

If there are any unclear issues, the Thai version of the document shall be preferred.