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บริษัท เชียงใหม่ฟรอสเฟูดส์ 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

**Handbook for Directors, Executives, and Employees**  
**Regarding Anti-Corruption Measures**  
**Chiangmai Frozen Foods Public Company Limited**

The Board of Directors and senior management acknowledge the anti-corruption measures and have the authority and responsibility to establish policies, guidelines, and procedures, and to support their concrete implementation. This ensures that the Board of Directors and senior management truly recognize and prioritize these measures, fostering their adherence as part of the company culture. Therefore, the following policies and guidelines are established:

**1. Anti-Corruption Policy**

The company's directors, executives, and employees are prohibited from engaging in any act involving fraud and corruption of any kind for their own benefit, that of their family, friends, or acquaintances, directly or indirectly, whether as recipients, givers, or offerors, in monetary or non-monetary terms, to government or private entities. Individuals with whom the company conducts business or has contact must strictly adhere to its policies. Failure to comply will result in disciplinary action according to company regulations and may also be subject to legal penalties if the action constitutes an illegal act.

**Guidelines**

Director Executives and employees shall not take any action that shows that they are accepting bribes or bribing stakeholders for matters for which they are directly or indirectly responsible for obtaining unfair benefits. By doing the following:

- 1) Do not accept gifts of souvenirs in the form of cash, checks, bonds, stocks, gold, gems, real estate or similar items with whom they have contacted and coordinated, both government agencies and private agencies that benefit the person or cause damage to the Company.
- 2) Do not accept property, goods, gifts, gifts, or any other benefits that induce them to neglect to perform their duties.
- 3) Before receiving souvenir gifts, 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. As follows:
  - 3.1) Gifts or souvenirs with a value of not more than 1,000 baht can be received immediately.
  - 3.2) Gifts or souvenirs with a value of 1,001 - 5,000 Baht shall be prepared according to the prescribed form and shall be approved by the Office Manager / General Manager / Director of Accounting and Finance Department.
  - 3.3) Gifts or souvenirs valued at 5,001 Baht or more shall be prepared in accordance with the prescribed form and shall be considered and approved by the Managing Director or a person designated by the Company.



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- 4) Do not give property, goods, gifts or gifts or any other benefits to motivate decisions or influence the recipients. Not following the same trade practices as other suppliers.
- 5) However, the provision of items according to various occasions or agendas must not exceed the normal value and is in accordance with the guidelines set forth in the work manual and approval authority.
- 6) It is not an intermediary in offering 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 made government or private officials. Ignoring the rules Prescribed Rules, Regulations and Legal Practices

## 2. Charitable Donations

- 1) The use of the Company's money or assets for charitable donations must be done only on behalf of the Company. By making a charitable donation, the recipient must be a foundation. Public charitable organizations, temples, hospitals. An educational institution or organization for the benefit of society that has a certificate or is reliable and can be audited by going through the procedures according to the company's regulations and approved by the authorized person.
- 2) Charitable donations in the personal name should be made. However, it must not be related or cause suspicion that it is a fraudulent act. In the hope of any benefit.

### Guidelines

- 1) The donation must be proven to be true and that the charitable project is actually being carried out to support the achievement of the project's objectives and bring genuine benefits to society or to meet the objectives of the CSR operation.
- 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.

## 3. Sponsorship

The provision of money or assets of the Company to support the project must be named in the name of the Company only. The subsidy paid Must have a business purpose 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 action to support the achievement of the objectives of the project and bring real benefits to society, or to meet the objectives of the operation with social responsibility.
- 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 agency, except In order to be a sponsor, a memorandum of application must be prepared. Specify the name of the beneficiary and



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the purpose of the support and attach all supporting documents to the authorized person for approval according to the Company's approval authority.

#### 4. Political support

- 1) 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, supports the observance of the law and democratic governance, and does not provide political assistance to any politician or political party. either directly or indirectly.
- 2) The definition of 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 business advantages. 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

- 1) The Company has an impartial business policy. Not politically inclined. The Company will not provide financial or material support to political parties. Politicians provide political assistance according to the definition mentioned above.

#### 5. Procurement

Procurement, Contracting It must be carried out through procedures in accordance with the company's regulations. It is transparent and verifiable.

#### 6. Hospitality and other expenses

Expenses for business hospitality and other expenses related to the performance of business contracts can be made, but reasonable expenditures can be audited.

#### 7. Communication and dissemination

- 1) In order for customers, business partners, creditors, and related agencies The Company's employees, as well as its subsidiaries, associates, other companies under the Company's control, business representatives, as well as the public are aware of the Anti-Corruption Policy. The Company will take the following actions:
- 2) The Company will disseminate the Anti-Fraud and Corruption Policy through the Company's communication channels such as the Company's website, emails, Annual Disclosure Report (Form 56-1 One Report), circulars, etc. Social Responsibility Report Orientation, Training, Seminar
- 3) The Company will post an anti-corruption policy. In conspicuous places. It is easily readable and accessible to all employees in the organization.
- 4) The Company will provide orientation, training, and seminars on the anti-corruption policy for all employees to be informed and implemented seriously.



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## Penalties

- 1) Director Executives and employees The anti-corruption policy must be strictly followed. Those who do not comply or commit fraud and corruption are considered to be acts that violate business ethics and the Company's corporate governance policy 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. The penalties are as follows:
  - 1.1) Verbal reprimands recorded in writing as evidence.
  - 1.2) Written admonition
  - 1.3) Written warning and wage reduction or transfer of position, or not being considered for annual bonus and/or not being considered for annual wage increase, except for wage adjustment according to the law.
  - 1.4) Written reprimands and unpaid suspension
  - 1.5) Dismissal and/or legal proceedings
- 2) Employees should not be neglected or ignored. When witnessing acts or behaviors that fall under the category of corruption and corruption or corruption that affect the Company, either directly or indirectly. Employees must inform their supervisors or responsible persons and cooperate in investigating various facts. If you have any questions or concerns, please consult your supervisor or the person designated by the Company through the designated channels.
- 3) The Company will provide 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 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.
- 4) The Board of Directors and the Chief Executive Officer are aware of the importance of disseminating, providing knowledge, advice, consultation, and understanding to personnel in the organization. Related parties as well as subsidiaries Associates, other companies under the Company's control, and business representatives regarding the implementation of anti-corruption measures so that personnel and related parties Comply with this policy and be a good example of honesty, ethics and good morals.
- 5) The Company is committed to creating and maintaining a corporate culture that adheres to the belief that corruption and corruption, giving or taking bribes, are unacceptable acts. Regardless of whether it is an act against any person, whether in the government or private sector.
- 6) Anti-corruption policy to cover the personnel management process from recruitment. Personnel selection, promotion, training, and employee performance evaluation. Communicate and understand with employees for use in business activities under their responsibility and effectively supervise the practice.



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This Handbook for Directors, Executives, and Employees on Anti-Corruption Measures was approved by the Board of Directors Meeting No. 1/2016 on February 26, 2016, and revised by the Board of Directors Meeting No. 1/2026 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.