

**Non-Discrimination Policy** 

# 1. Objective

CPF Trading Company Limited recognizes and values difference in concepts, skills, and experiences of its personnel to reinforce their capabilities in driving the Company sustainably. The Company encourages building a "respect for people" working environment and ability to live together on individual differences with no discrimination in any forms. The Company therefore determines Non-Discrimination Policy for operations to progress smoothly.

This Policy is the supplement of Human Rights Policy and Diversity and Inclusion Policy which have been issued earlier. It will conform to Code of Conduct and comply with the law, including any declarations and standards which the Company adheres to.

The Company shall protect its employees at all levels against discrimination in the zero-tolerance approach with an aim to build safe and happy workplace. In case that the discriminatory incidents occurred in the workplace whether intentionally or not. The Company will carry out a fair investigation into such discriminatory incidents.

# 2. Scope

This Policy applies to CPF Trading Company Limited and its non-listed subsidiaries in Thailand and overseas. For the Company's listed subsidiaries and their subsidiaries as well as the joint-ventures, they can deploy this Policy as appropriate to align with their business context and internal management process according to the geosocial background of the country in which they operate.

### 3. Terms and Definitions

The Company

CPF Trading Company Limited and its subsidiaries

**Subsidiaries** 

Subsidiary companies in accordance with Securities and Exchange Act and subsidiary companies as included in the financial statements of the Company, but excluding:

(a) a subsidiary company whose ordinary shares are listed in any stock exchange;

(b) any subsidiary company of a company under (a)

Any companies that CPF Trading Company Limited governs in accordance with the mutual agreed terms as stipulated in the joint-venture agreement and are not the Company's

Subsidiaries

Executives of the Company

Employees and Workers at all levels of the Company

Executives and Employees of the Company

Any different treatment or discrimination or special treatment to an individual or a group of people on the basis of personal characteristics on ethnicity, nationality, race, skin color, family background, belief, religion, social status, gender, sexual diversity (LGBTQIA+), age, physical stature, disability, incapacity, spoken language, political belief including marital status, or any particular features causing discriminatory incidents.

Operational facilities, for instance:

- Office, Distribution Center, Plant, Farm, Shop or Place of the Company
- Place of Company's functional events
- Place of work assigned for a business mission
- Place of conference or training

This applies for the place on which duties are being performed, for instance:

- During a business trip
- During a business telephone conversation

Joint-Ventures

**Executives** 

**Employees** 

Personnel

Discrimination

Workplace

During any use of electronic devices for business purpose

# 4. Roles and Responsibilities

### 4.1 Board of Directors

- 4.1.1 To declare the non-discrimination statement and policy which provide zero-tolerance approach to any forms of discrimination and demonstrate the Company's total commitment to the fair and equitable treatment of all individuals or groups.
- 4.1.2 To govern, promote, support and be role models to ensure that the personnel of the Company work together with mutual respect on the basis of their differences, and are committed to build an inclusive corporate culture on integrity, morality and ethics.

### 4.2 Human Resource Office

- 4.2.1 To foster the respect for individuals' rights and the equitable and non-discrimination treatment through relevant policies, and communicates these policies to all employees to ensure that they act in accordance with this Policy.
- 4.2.2 To monitor the human resource operations to ensure that they are administrated and managed in accordance with the laws and the international labor standards.
- 4.2.3 To establish measures to prohibit against, and appropriately deal with, discriminatory acts in any forms.
- 4.2.4 To govern the handling of complaints regarding discrimination in any forms through communication and complaint channels provided within the organization, as well as through the welfare committee at workplace and collaborative programs with civil society organization so as to ensure that the Company's labor management and administration are appropriate, transparent and fair.

### 4.3 Executives

To govern to ensure that the personnel under their supervision perform duties with mutual respect, value their differences and being committed to the corporate culture of inclusion on the basis of integrity, morality and ethics.

### 4.4 Employees

- 4.4.1 To avoid discriminatory acts in any forms.
- 4.4.2 If coming across any conduct which may involve any forms of discrimination, report such conduct through the channels provided under the Whistleblowing Policy of the Company.

# 5. Principle

To prohibit discrimination in the zero-tolerance approach in any forms within the organization, the Company has set the guideline as follows:

### 1. Recruitment and Selection

- No discriminatory wording in any job vacancy advertisement.
- Recruitment and selection shall not be discriminatory on the basis of ethnicity, nationality, race, skin color, family background, belief, religion, social status, gender, sexual diversity (LGBTQIA+), age, physical appearance, disability, disease, spoken language political belief etc. It shall only be on qualifications required for the job vacancy.
- Salary, welfare and working condition offered must be fair to all candidates on the same standard of the vacant position.
- Application and supporting documents must be kept confidential, not disclosed to unconcerned persons and the user of those documents must be identified.
- Any psychometric test and pre-employment medical check-up must be related to working requirements.

# 2. Human Resources Development

- Development program must be equally arranged and not discriminatory for all staff depending on their training required for the current position and for his/her career progression.
- Approval for training must be no discrimination.
- Awareness raising program of the requirements of this Policy shall be developed and promoted to all employees through training.

### 3. Performance Appraisal

Performance appraisal guideline must be clear, transparent, and based on actual performance
including behaviour conform to the Company's values. The appraisal process should be
conducted in a face-to-face meeting in order to mutually reflect upon the appraisal results.

# 4. Employee's Compensation

 Compensation and promotion scheme must be in accordance with applicable policy, on the basis of transparency and accuracy under the same standards.

### 5. Transfer/Exit

- Transfer process must be equally fair in careful consideration given to career progression opportunities and without discrimination.
- Dismissal from the Company must be on the ground of the performance measured as
  inadequate to the Company's standards and remaining unchanged despite opportunity given
  for his/her improvement and follow-up efforts by the Company or disciplinary actions
  causing dismissal or health problems based on medical doctor's diagnosis, or any other
  reasons which are not regarded as discrimination.

# 6. Reporting guidelines when encountering discrimination incidents

 The harassed employee speaks to the offender for the unwelcome behaviour to cease immediately.

- If the offender continues such behaviour, the harassed employee reports to his/her direct supervisor or supervisor's hierarchical superior or Human Resources Manager, as deemed appropriate.
- Related Human Resources (Senior Management or above) investigates and gathers information from the offender and the harassed employee, as well as witnesses (if any) within 7 days from the date of reported incident.
- Related Human Resources (Senior Management level or above) sets up an investigation committee comprising at least 3 members:
  - Senior Management or above from the offender's Business unit
  - Senior Management level or above from any other Business unit not involved in the incident (as intermediary)
  - Senior Management level or above from Human Resources
- In the case that an employee commits an offence that requires specified processes governing the disciplinary procedures in accordance with Regulation on Disciplinary Investigation and Punishment B.E. 2564, or the applicable Company's Rule and Regulation and its future amendments, a Senior Management level or above from Human Resources is appointed to properly follow those procedures.
- Impose disciplinary action to the offender or the party having made false accusation, based on the investigation committee's deliberation and verdict.
- If it is a criminal case and involves a lawsuit, Legal Office must be involved.
- The harassed employee who reports the incident will be protected and will not receive negative impact due to the reporting of such incident.
- In respect of any business establishments of the Company located within Thailand, if an individual, being affected by, or reporting, a discriminatory incident, intends to file a complaint through other channels, including the collaborative programs between the

Company and civil society organization, he/she may do so pursuant to the measure and process provided or guided by the Company.

# 6. Penalty

Any employee who acts in violation of, or fails to comply with, this Policy, whether directly or indirectly, the employees (as the case may be) shall be subject to the disciplinary action according to the work rules of the Company as well as the penalty as imposed by the law.

# 7. Policy Revision

The Human Resource Office shall revise this Policy on an annual basis or earlier as appropriate. If the Policy is found to be unsuitable with the nature of business operations of the Company, the Human Resource Office shall revise and present the revised policy to senior executive of Human Resource Office, before proposing to the Board of Directors for approval.

This Non-Discrimination Policy was approved by the Board of Directors on 1 February 2023.