
CPF Trading Company Limited

Anti-Corruption Policy

1. Objective

CPF Trading Company Limited (“The Company”) believes that the conduct of businesses in a fair, honest, and transparent manner, with responsibility towards all groups of stakeholders, will essentially support the sustainable growth of its businesses. The Company has established this Anti-Corruption Policy (“this Policy”) to serve the Company and/or its subsidiaries as a framework for the conduct of business.

2. Scope

This Policy applies to the Company and its non-listed subsidiaries. For the Company's listed subsidiaries and their subsidiaries, 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

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)

Directors

Directors of CPF Trading Company Limited and/ or its subsidiaries

Executives

Executive of CPF Trading Company Limited and/ or its subsidiaries

Employees

Any employees of CPF Trading Company Limited and/or its subsidiaries that receive daily or monthly remuneration whether on permanent, temporary or special employment contracts

Personnel Directors, Executives, and Employees of CPF Trading Company Limited and/or its subsidiaries

Corruption Any form of bribery, be it an act of offering, undertaking to give, giving, promising to give, requesting or accepting money, property, or any other improper advantage to, or from, public officials, government agencies, private entities, persons in charge, or the Company and/or its subsidiaries' executives and employees, whether directly or indirectly, in order to induce them to do, or omit to do, any act in the performance of their duties, to secure or retain business, to direct business to the Company, or to secure any improper advantage, unless permitted by laws, regulations, notifications, rules, local customs, or common business practices

4. Roles and Responsibilities

4.1 Board of Directors

4.1.1 To establish the Anti-Corruption Policy and conduct monitoring to provide a system for supporting efficient anti-corruption efforts, in order to ensure that all employees are aware of, and recognize, the importance of anti-corruption efforts, as well as to foster anti-corruption values as part of the organization's culture.

4.1.2 To govern, encourage, support and lead by example of conducts to ensure that the personnel resist and avoid any acts associated with corruption.

4.2 Audit Committee

To review the financial and accounting reporting system, internal control system, internal audit system, and risk management system, to ensure that they comply with international standards and are expedient, appropriate, and up-to-date, and that all reporting is complete and correct.

4.3 Corporate Governance Committee

To set up the review of practice guidelines and implementation requirements, in compliance with the changes in businesses, or any relevant rules, regulations, or laws, and to approve the revisions or amendments thereto before submitting them to the Board of Directors for further consideration and approval, as well as to provide opinions and recommendations that will benefit the executives in preparing work plans and implementing this Policy.

4.4 Executives

4.4.1 To establish systems, processes and measures for compliance with the Anti-Corruption Policy, including reviewing the appropriateness of these systems, processes and measures in compliance with the changes in the business, regulations, rules and legal requirements.

4.4.2 To promote and support compliance with anti-corruption policy and practice guidelines by communicating them to employees and all concerned parties.

4.4.2 To govern to ensure that employees comply with the policies, systems, processes and measures regarding anti-corruption.

4.5 Employees

4.5.1 To comply with the Anti-Corruption Policy.

4.5.2 To not disregard or neglect if coming across any act that may involve corruption related to the Company and/or its subsidiaries or violate this Policy, and shall report such act through the channels provided under the Company and/or its subsidiaries' Whistleblowing Policy.

4.6 Internal Audit Office

- 4.6.1 To review the Company and/or its subsidiaries' internal control system, to ensure that it can adequately and appropriately address any possible risks of corruption, as well as to review compliance with the internal control system, including, but not limited to, this Policy, the practice guidelines, implementation requirements, rules, regulations, laws, and stipulations of the regulatory authorities, and to report the findings to the Audit Committee.
- 4.6.2 To handle any complaint/whistleblowing regarding corruption and coordinate with relevant functions in managing and resolving the complaint/whistleblowing.

5. Principle

- 5.1 Personnel of the Company and/or its subsidiaries must comply with this Policy and the Company's Code of Conduct, and must not directly or indirectly take part in any act that constitutes corruption for the benefit of the Company and/or its subsidiaries, themselves, their family members, friends, or acquaintances.
- 5.2 Personnel of the Company and/or its subsidiaries must not disregard or neglect if coming across any act which may involve corruption related to the Company and/or its subsidiaries or violate this Policy, and shall report such act through the channels provided under the Company or its subsidiaries' Whistleblowing Policy, as well as fully cooperate with any investigation or fact finding. Should there be any doubt or question, the personnel shall consult and communicate any query to a direct supervisor or responsible person.
- 5.3 The Company and/or its subsidiaries shall provide fairness and protection to personnel who deny an act that constitutes corruption or report an incident of corruption, according to the Whistleblowing Policy, as established by the Company.
- 5.4 The Company and/or its subsidiaries emphasizes dissemination of knowledge to, and creation of understanding with third parties engaging in business transactions with, or having any interest in,

the Company and/or its subsidiaries, on matters that must comply with this Policy, as well as the disclosure of this Policy to the public.

- 5.5 The Company and/or its subsidiaries communicate this Policy, including its internal channels for whistleblowing, lodging complaints, or providing recommendations, through various means and channels, such as director and employee orientation, and intranet, etc., in order to provide knowledge and understanding on the implementation of this Policy.
- 5.6 The Company shall have in place human resource management processes that reflect its commitment to this Policy, including personnel recruitment, training, performance evaluation, compensation, promotion, as well as an organizational structure with appropriate segregation of duties to ensure checks and balances, and shall take steps to ensure that it has sufficient and appropriate resources and skilled personnel to implement this Policy.
- 5.7 Any acts under this Policy shall follow the practice guidelines established under the Company's Code of Conduct, Governance Policy, and policy and practice guidelines relating to various groups of stakeholders, including the Company's applicable regulations and operating manual, as well as any other practice guidelines to be established by the Company and/or its subsidiaries.
- 5.8 For the purpose of clarity in dealing with matters that are exposed to a high risk of corruption, the Directors, Executives and Employees at all levels must be careful when dealing with the following:
- 5.8.1 Gifts, hospitality and expenses
- Offering, giving, or receiving gifts or hospitality must be in accordance with the Company's Code of Conduct.
- 5.8.2 Charitable contributions or sponsorships
- Giving or receiving charitable contributions or sponsorships must be transparent and lawful. The Company must ensure that no charitable contribution or sponsorship is used as a subterfuge for bribery.

5.8.3 Business relationships and government procurement

- Offering or receiving bribery in all kinds of business is prohibited. All dealings and interactions with the public sector must be transparent and honest, and must comply with applicable laws.

6. **Penalty**

Any employee who acts in violation of, or fails to comply with, this Policy, whether directly or indirectly, 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 Corporate Compliance 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 and/or its subsidiaries, the Corporate Compliance Office shall revise and propose the revised policy to the Board of Directors for approval.

This Anti-Corruption Policy was approved by the Board of Directors on 1 February 2023.