ANTI-CORRUPTION POLICY & GUIDELINES

THAI UNION FEEDMILL PUBLIC COMPANY LIMITED

Revision on 30 October 2026

-Translation-

ANTI-CORRUPTION POLICY

Purpose

Thai Union Feedmill Public Company Limited (the “Company") is committed to conducting business with transparency, integrity, and full compliance with applicable laws. To demonstrate such commitment, the Company has established this Anti-Corruption Policy ("Policy") in accordance with the laws of Thailand, international standards, and generally accepted anti-corruption guidelines to ensure that the Company, directors, executives, and employees comply with all relevant anti-corruption laws, regulations, and requirements.

The Company adopts a zero-tolerance approach to corruption in all forms, covering all regions, countries, and business units in which the Company operates. The Company has established anti-corruption guidelines and procedures with strict operational requirements. Such guidelines and procedures should be reviewed regularly to ensure consistency with changes in laws and business practices, and to maintain fair and ethical business conduct. All directors, executives, and employees are required to comply with this Policy and communicate it to external stakeholders to prevent corruption-related risks.

Any act of corruption committed by Company personnel shall be considered a serious disciplinary offense and shall be subject to disciplinary actions in accordance with the Company's work rules and regulations.

The Company shall provide protection to directors, executives, and employees who refuse to engage in corruption in compliance with this Policy and the related anti-corruption guidelines.

Scope

This Policy applies to all directors, executives, and employees of the Company (collectively referred to as "Employees"), including employees of subsidiaries and associates. It also applies to business partners and third parties acting on behalf of the Company.

Definitions

Corruption means the performance or omission of duties, or the abuse of authority associated with one's position, for the purpose of obtaining any form of improper benefit as an employee, agent, or person otherwise associated with the Company, whether for the benefit of the organisation, oneself, or another person. It also includes any act that violates the Company's rules, regulations, and operating procedures.

Corruption may take many forms, including but not limited to:

1. Political contributions
2. Charitable donations and sponsorships
3. Facilitation payments
4. Gifts and hospitality
5. Cash and cash equivalents
6. Travel expenses for leisure purposes or those unrelated to business activities

Bribery means the offering, promising, giving, or receiving of money, property, or any other benefit, directly or indirectly, in order to influence another person's decision-making or induce such person to act or refrain from acting in violation of laws, regulations, ethical standards, or the Company's rules and operating procedures.

Facilitation Payment means any payment made to a government official to expedite or secure the performance of a routine action or a necessary duty that the government official is already obligated to perform.

Political Contribution means financial or non-financial support provided to political parties, politicians, or political candidates, including the provision of goods, services, advertising, promotional activities, equipment, or employees' working time for political purposes.

Misappropriation means the use of Company funds, assets, or working time entrusted for business purposes for personal benefit, the benefit of others, or activities unrelated to the Company's business.

Government Official means a public official, state official, foreign government official, or official of an international organisation as defined in Section 4 of the Organic Act on Anti-Corruption B.E. 2561 (2018).

Third Party means an agent, consultant, advisor, joint venture partner, intermediary, or any other individual or organisation that interacts with government officials on behalf of the Company.

Duties and Responsibilities

The Board of Directors is responsible for overseeing and ensuring that business operations are transparent, auditable, and conducted in accordance with the Company's Anti-Corruption Policy, guidelines, and procedures, including the effective implementation of anti-corruption measures.

The Nomination, Remuneration, and Corporate Governance Committee is responsible for overseeing compliance with the Anti-Corruption Policy to ensure that related policies and practices are implemented appropriately and completely, as well as monitoring effectiveness, reviewing, and revising this Policy and related guidelines.

The Audit Committee is responsible for overseeing the internal control system, reviewing financial reporting and accounting systems, record-keeping practices, and other relevant Company processes to ensure they meet international standards and are adequate, appropriate, up-to-date, and effective in preventing corruption. The Committee shall establish channels for complaints and whistleblowing related to bribery and corruption, provide guidance regarding compliance with anti-corruption measures, and regularly report audit results to the Board of Directors.

The Risk Management Committee is responsible for reviewing corruption risk assessment reports and providing recommendations to ensure that risk management measures are appropriate and capable of maintaining risks at an acceptable level.

The Internal Audit Department is responsible for auditing and reviewing operational compliance with Company policies, guidelines, and applicable laws to ensure that the Company maintains an internal control system that is appropriate and sufficient for potential corruption risks. The Department shall report its findings to the Audit Committee.

The Human Resources Department is responsible for communicating, training, promoting, and continuously developing awareness and understanding of anti-corruption requirements. The Department is also responsible for arranging assessments of executives' and employees' understanding of the Anti-Corruption Policy and related practices.

Management is responsible for implementing anti-corruption measures and ensuring that subordinates are aware of, understand, and receive adequate and regular training regarding the Policy. Management shall communicate the Policy and raise awareness among both internal and external stakeholders, establish appropriate management systems and measures, and continuously review anti-corruption measures to ensure compliance with the Policy's objectives and changing legal and business environments.

All employees are responsible for understanding and complying with this Policy. Any employee who has questions or becomes aware of any violation must report it to a supervisor or through the Company's designated reporting channels.

Policy and Guidelines

Policy Statement

1. The Company adopts a Zero Tolerance Policy toward corruption and complies with anti-corruption laws in all jurisdictions where it conducts business. The Company will not engage, directly or indirectly, in any illegal acts or unethical conduct and is committed to implementing effective anti-corruption systems.
2. All employees are prohibited from participating in any form of corruption, including giving or receiving bribes involving government officials or private-sector entities, whether directly or indirectly.

Political Contributions

Political Contribution means providing support or assistance, whether in the form of money, assets, goods, services, or any other benefits, directly or indirectly, to political parties, politicians, political office holders, politically connected persons, or any political groups for the purpose of obtaining business benefits or creating a competitive advantage for the Company. This does not include directors, executives, or employees participating in political activities or exercising their political rights in a personal capacity, as permitted under applicable laws and constitutional rights.

1. The Company maintains a policy of political neutrality and shall not support or engage in any activities that favour any political party or political group.

2. Employees have the right and freedom to participate in political activities in their personal capacity under the Constitution and applicable laws. However, employees must not represent themselves as acting on behalf of the Company and must not use the Company's assets, resources, facilities, equipment, funds, or any other Company property for political purposes, whether in the form of financial support or other forms of assistance, including the provision of goods, services, advertising, promotional activities, or similar support.

3. Directors, executives, and supervisors at all levels are prohibited from directing, persuading, pressuring, or influencing employees or subordinates by any means or in any form to participate in activities of any political party, political group, politician, or political organisation.

Charitable Donations and Sponsorships

Charitable Donation means the giving or receiving donations in the form of financial contributions, goods, services, or other forms of assistance (such as sharing knowledge or volunteering time) as part of the Company's commitment to social responsibility, without expecting any business benefit or return in exchange.

The Company conducts charitable donations and sponsorship activities with transparency and without any hidden purpose. Appropriate review procedures, controls, and approval processes are established to ensure that such donations are not used to obtain undue or improper benefits for oneself or others, nor serve as a means or pretext for bribery or corruption.

Guidelines for Charitable Donations

- The charitable donation must be supported by verifiable evidence demonstrating that the charitable project or activity genuinely exists and is being carried out as intended. The donation must contribute to the successful achievement of the project's objectives and provide genuine benefits to society or be aligned with the Company's Corporate Social Responsibility (CSR) objectives.
- The charitable donation must be demonstrably made for legitimate charitable purposes and must not be associated with any form of reciprocal benefit to any individual or organisation. This excludes customary forms of recognition generally accepted in practice, such as the display of logos, acknowledgment of the Company's name at an event venue, or recognition in publicity and communication materials.

Guidelines for Sponsorships

Sponsorship means the provision or receipt of support in the form of money, assets, goods, services, or any other benefits for the purpose of promoting the Company's image, reputation, business relationships, or corporate publicity. Such sponsorships must be conducted transparently, be verifiable, and comply with all applicable laws, regulations, and relevant requirements.

- The sponsorship must be supported by verifiable evidence demonstrating that the recipient is genuinely carrying out the activities or project for which the sponsorship is requested, and that the sponsorship contributes to the successful achievement of the project's objectives, provides genuine benefits to society, or supports the Company's Corporate Social Responsibility (CSR) objectives.
- The sponsorship, including any other benefits that can be quantified in monetary terms, such as accommodation, meals, or similar support, must be demonstrably unrelated to any improper reciprocal benefit provided to any individual or organisation, except for customary acknowledgements generally accepted in normal business practice.
- Prior to providing sponsorship, a sponsorship request memorandum must be prepared, specifying the name of the recipient and the purpose of the sponsorship, together with all supporting documents, such as sponsorship request letters and/or emails. The request must then be submitted to the Company's authorised approver for consideration and approval in accordance with the Company's Delegation of Authority (DOA).

Facilitation Payments

The Company has a strict policy prohibiting the payment of facilitation payments. Any payment of facilitation payments, which may lead to corruption, is strictly prohibited.

Gifts and Hospitality

1. Gifts refer to the giving of cash, cash equivalents, gift cards, vouchers, honoraria, or any other benefits. Hospitality and business courtesies refer to the giving or receiving of meals, beverages, accommodation, travel, company visits, study tours, sporting events, or other expenses associated with normal business activities, including activities intended to foster business relationships and enhance understanding of the Company's business. Such activities must be conducted appropriately, transparently, and without improperly influencing business decisions. They may be provided or accepted within reasonable limits, in accordance with customary business practices and traditions, if they are not intended to induce a person to perform or refrain from performing any act that could lead to bribery or corruption.
2. Employees may provide gifts and hospitality to any person only if all the following conditions are met:
    1) The gift or hospitality is not intended to influence, induce, reward, or improperly persuade any person to obtain an advantage through inappropriate actions, nor is it an explicit or implicit exchange for assistance, preferential treatment, or any other benefit.
    2) The gift or hospitality complies with all applicable laws and regulations.
    3) The gift or hospitality is provided on behalf of the Company and not in the employee's personal capacity.
    4) The gift is not in the form of cash or cash equivalents (such as gift cards, vouchers, or similar instruments).
    5) The gift or hospitality is appropriate to the circumstances, such as gifts exchanged during customary festive occasions, including Christmas and New Year celebrations.
    6) The gift or hospitality is provided openly and transparently, without concealment.
3. Employees are not permitted to accept gifts from any person.

Conflict of Interest

Conflict of Interest refers to any activity or situation in which personal interests, or the interests of related persons, whether by blood relation or otherwise, may influence decision-making or interfere with, obstruct, or be contrary to the best interests of the Company. All employees are required to avoid any actions that may give rise to a conflict of interest with the Company or its group companies. Any action or decision must be reasonable, made in the best interests of the Company, and comply with applicable laws, regulations, rules, and ethical standards. Where any action, transaction, or circumstance may constitute an actual, potential, or perceived conflict of interest with the Company, such conflict must be disclosed promptly so that appropriate consideration can be given to identifying measures to resolve, mitigate, or avoid the conflict.

Anti-Money Laundering

All employees are strictly prohibited from engaging in any form of money laundering, whether in connection with the Company's business operations or their personal activities.

Employment of Government Officials

1. The Company does not have a policy of appointing or employing current government officials serving in government agencies as employees or executives of the Company.
2. Where it is beneficial to the Company and does not violate any applicable laws, regulations, or requirements, and does not give rise to a conflict between the personal interests of the government official, public interests, official duties, and the interests of the Company, the Company may appoint a government official as a director or advisor, subject to the conditions set out in Clause 3.
3. The appointment or employment of former government officials as directors, advisors, or executives of the Company may be made only after the expiration of a two-year cooling-off period, or where such appointment is not prohibited by applicable laws, regulations, the rules of the government agency to which the individual was formerly affiliated, or any other relevant requirements.
4. The recruitment of individuals who are or were government officials for appointment or employment as directors, advisors, or executives of the Company shall be subject to a background review process, including verification of the individual's employment history and government service record. This is to ensure that such appointment or employment is not intended as a reward for obtaining any improper benefit.
5. To promote transparency in the appointment process, the Company shall disclose information regarding individuals who are former government officials and have been appointed by the Company, including their qualifications and professional experience, in the Company's public disclosure documents.

Company and Related Business Parties

1. Subsidiaries, Affiliates, and Joint Venture Companies under the Company's Control

   The Company shall communicate and promote compliance with this Anti-Corruption Policy among its subsidiaries, affiliated companies, and joint venture companies over which the Company has control, and encourage such entities to adopt and implement anti-corruption practices consistent with this Policy.

2. Agents and Business Intermediaries

   Employees are prohibited from engaging or appointing any agent, representative, consultant, intermediary, or other business facilitator for the purpose of offering, giving, receiving, or facilitating bribes or engaging in any form of corruption.

3. Suppliers, Service Providers, and Contractors

   The Company shall conduct the procurement of goods and services in a fair, transparent, and equitable manner. The Company shall also exercise due care and appropriate diligence in evaluating and selecting suppliers, service providers, and contractors. The Company shall communicate this Policy to suppliers, service providers, and contractors and expects them to comply with its anti-corruption principles. The Company reserves the right to terminate procurement, purchasing arrangements, contracts, or business relationships with any supplier, service provider, or contractor found to have engaged in bribery, corruption, or other improper conduct.

Corruption Risk Assessment

1. Corruption risk assessment is a fundamental element of the Company's anti-corruption framework. Therefore, all executives must understand how the Company's business processes may be exposed to corruption risks in order to effectively identify, assess, and manage such risks.

2. The Group Risk Management and Internal Control Department shall regularly assess potential corruption risks, at least annually, and report the assessment results to the Risk Management Committee and the Board of Directors for acknowledgement. The Department shall also review existing risk management measures to ensure that they remain appropriate and effective in maintaining corruption risks at an acceptable level.

Internal Control and Audit

1. The Company shall maintain an effective internal control system to prevent and combat corruption. Such controls shall include oversight mechanisms, segregation of duties, accounting controls, record retention practices, and business processes relevant to this Policy.

2. The internal control system shall consist of organisation-wide controls as well as specific control measures and procedures designed to address corruption risks that the Company may face in particular business areas.

The internal control system shall include, but not be limited to, Operational Controls, Environmental Controls, and Financial Controls.

3. Organisation-wide controls shall include business ethics, management's anti-corruption commitment and statements reviews and audits conducted by the Internal Audit function contract review and oversight by the Legal function human resources policies covering recruitment, compensation, and disciplinary actions, appropriate delegation of authority and segregation of duties, accurate and reliable accounting and financial recording and reporting, and whistleblowing and complaint reporting channels.

Record Keeping and Record Retention

1. The Company is committed to complying with applicable standards, principles, and legal requirements relating to accounting and financial reporting.
2. All expenditures and transactions must be supported by appropriate documentation. The collection, retention, and maintenance of the Company's records and information must comply with applicable laws, regulations, and Company requirements.
3. The Company strictly prohibits the creation or recording of false, misleading, incomplete, inaccurate, or improper information, as well as any manipulation of accounting records. In addition, no off-the-book accounts, undisclosed funds, or unrecorded transactions may be established or maintained for the purpose of facilitating or concealing improper payments.

Human Resources Management

The Company recognizes that its personnel are a key resource in driving sustainable organisational growth. Accordingly, the Company places significant importance on human resource management through systematic, transparent, and fair practices. The Company has established policies, regulations, and standard operating guidelines covering the entire employee lifecycle, including recruitment and selection, orientation, development and training, performance evaluation, compensation management, promotion, as well as employee welfare and benefits.

The Company communicates relevant policies, regulations, and guidelines to directors, executives, and employees at all levels to promote understanding and encourage consistent compliance. Such efforts contribute to effective, transparent, and standardized human resource management throughout the organisation.

In addition, the Company has established an Anti-Corruption Policy and promotes adherence to its principles among all directors, executives, and employees as an integral part of the Company's corporate culture. The Company shall continuously communicate and raise awareness of individual roles and responsibilities in preventing and combating corruption.

The Company provides protection to whistleblowers, complainants, witnesses, individuals cooperating in investigations, as well as employees who refuse to engage in actions that may lead to fraud or corruption. The Company shall not subject such individuals to disciplinary action, harassment, demotion, dismissal, termination of employment, or any other form of adverse treatment, even where such refusal may result in the loss of a business opportunity for the Company. This commitment is intended to foster a working environment founded on ethical conduct, transparency, accountability, and the sustainable conduct of business with integrity.

Training and Communication

Employees

1) All employees shall receive regular training on anti-corruption matters to ensure awareness and understanding of this Policy, particularly regarding various forms of bribery, the risks associated with involvement in bribery or corruption, and the procedures for reporting actual or suspected corruption.

2) All employees shall be provided with a copy of this Policy to ensure that they are informed of and have access to the Company's anti-corruption requirements. In addition, the Policy and any updates or revisions thereto may be accessed through the Company's website at https://www.thaiunionfeedmill.com. The Company shall notify employees of any material changes to the Policy or related information.

3) Training and awareness regarding this Policy shall form part of the orientation program for all newly hired employees prior to commencing their employment with the Company.

Third Parties, Suppliers, Service Providers, and Contractors

1) The Company shall communicate its Anti-Corruption Policy to third parties, suppliers, service providers, and contractors from the outset of the business relationship and thereafter as appropriate.

2) The Company encourages third parties, suppliers, service providers, and contractors to uphold standards of corporate responsibility and ethical conduct consistent with those adopted by the Company.

Reporting of Bribery and Corruption Concerns and Employee Protection

1. If an employee has reason to believe, suspects, or possesses evidence that another employee or any person acting on behalf of the Company has engaged in bribery or corruption, the employee must immediately report the matter to his or her supervisor or through the reporting channels established by the Company. Upon receipt of such a report, the Company shall treat the matter seriously and shall not impose any disciplinary action or adverse consequences on any employee who provides information in good faith.

2. The Company assures employees that no employee shall be demoted, disciplined, or otherwise adversely affected because of refusing to participate in bribery or corruption, even if such refusal results in the loss of business opportunities or the inability to secure new business for the Company. The Company believes that a strict anti-corruption policy, under which bribery and corruption are not tolerated under any circumstances, contributes to the long-term value and sustainability of the Company. Furthermore, the Company will not tolerate any acts of intimidation, threats, harassment, or harm against employees who act in compliance with this Policy.

3. If an employee believes that he or she has been threatened, intimidated, coerced, harassed, or otherwise subjected to inappropriate pressure, the employee shall immediately report the matter to the Internal Audit Department or the Head of Human Resources. If the matter is not adequately resolved, the employee may escalate the report through the formal reporting channels established by the Company.

Policy Violations

1. The Company shall take disciplinary action against any person who violates the Policy. Accordingly, directors, executives, employees, and supervisors who ignore misconduct, or who are aware of a violation but fail to take appropriate corrective action, shall also be subject to disciplinary measures. Violations of this Policy or applicable anti-corruption laws may result in serious consequences, including, but not limited to, disciplinary sanctions, termination of employment, fines, and/or imprisonment as prescribed by applicable laws. Lack of awareness of this Policy and/or relevant laws shall not be accepted as a justification for non-compliance.

2. Any third party, supplier, service provider, or contractor of the Company who violates the requirements of this Policy, becomes aware of conduct that is inconsistent with this Policy but fails to report it to the Company's management, or provides false or misleading information during an investigation conducted by the Company, may be subject to termination of the relevant contract or business relationship with the Company.

Monitoring and Review

1. The Nomination, Remuneration and Corporate Governance Committee shall review this Policy on an annual basis and submit any proposed amendments to the Board of Directors for consideration and approval. The Committee shall also oversee and monitor the implementation of this Policy and provide ongoing guidance and recommendations. Any necessary revisions or improvements to the Policy shall be undertaken without delay.

2. The Internal Audit Department shall regularly review the internal control system and relevant processes to ensure that the Company's internal controls remain effective in preventing and combating corruption. Audit findings shall be discussed with the relevant parties to identify appropriate corrective actions, and the results shall subsequently be reported to Management and the Audit Committee for acknowledgement and further consideration.

This Policy was approved by the Board of Directors and shall become effective on 30 October 2026.

-Signature-

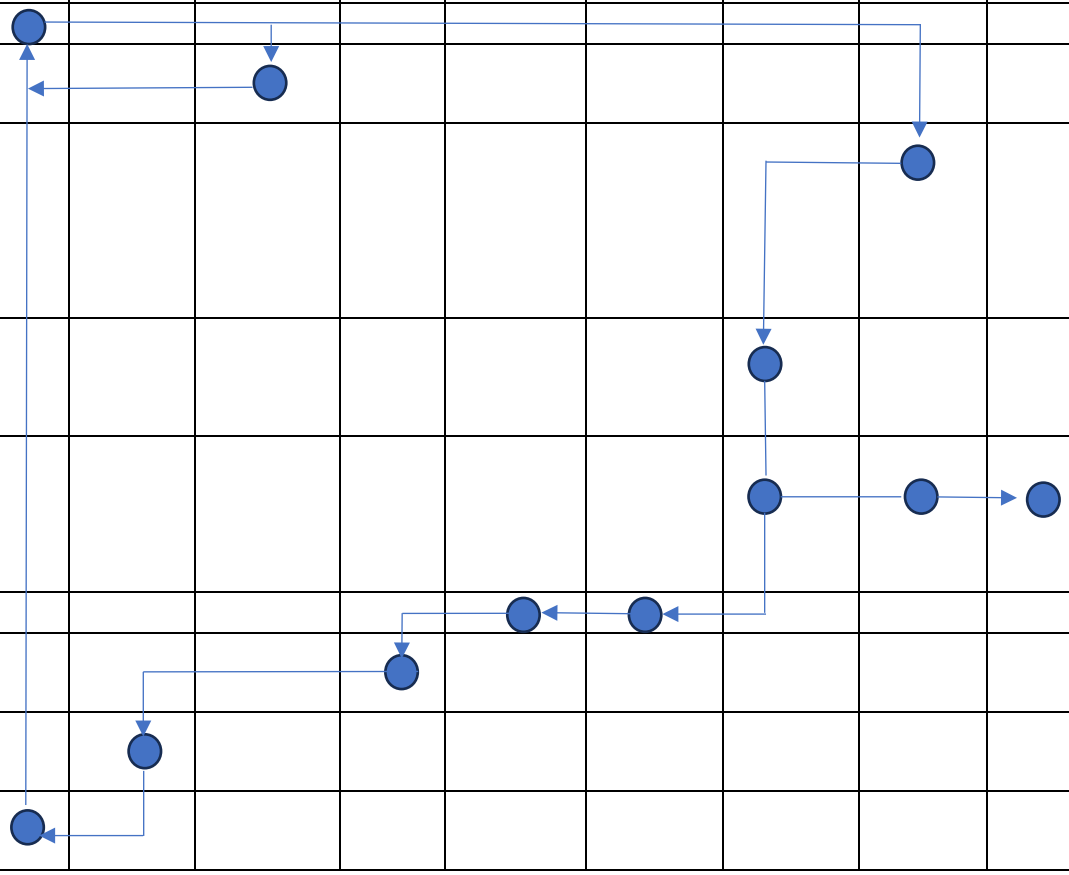
(Mr. Rittirong Boonmechote)

Chairman of the Board of Directors

Anti-Corruption Procedures

Governance and Monitoring Process

Process	Board of Directors	Audit Committee	Nomination, Remuneration and Corporate Governance Committee	Internal Audit Function	Risk Management Committee	Risk Management & Internal Control Department	Management	Compliance Function	Employees / Stakeholders
Approval&Announcement									
Policy Review / Monitoring and Providing Guidance									
Implementation / Establishment of Detailed Procedures / Providing Guidance and Clarifications									
Establishment and Review of Management Systems and Control Measures									
Communication of the Policy and Guidelines to Employees and Stakeholders									
Risk Assessment									
Review of Risk-Prone Activities									
Reporting Audit Results to the Audit Committee									
Reporting Audit Results to the Board of Directors									



Audit, Monitoring, and Internal Control Process

The Company has established audit, monitoring, and internal control processes to prevent corruption and to provide reasonable assurance that the risk management system is effective in achieving its intended objectives. These processes include the following:

1) Regular audits conducted by the Internal Audit function.
2) Protection of whistleblowers, complainants, and individuals who report concerns in good faith.
3) Investigation, inquiry, monitoring, corrective actions, and preventive measures conducted by the relevant departments in collaboration with the Internal Audit function.
4) Regular reporting of audit and internal control results to Management.
5) Assessment of risks arising from transactions and activities that may involve processes or procedures susceptible to corruption risks.
6) Implementation of risk management measures based on an assessment of both the likelihood and potential impact of identified risks.
7) Ongoing communication and training programs for Company personnel to enhance awareness, knowledge, and understanding of the Company's Anti-Corruption Policy and related requirements.

Whistleblowing and Complaint Reporting Channels

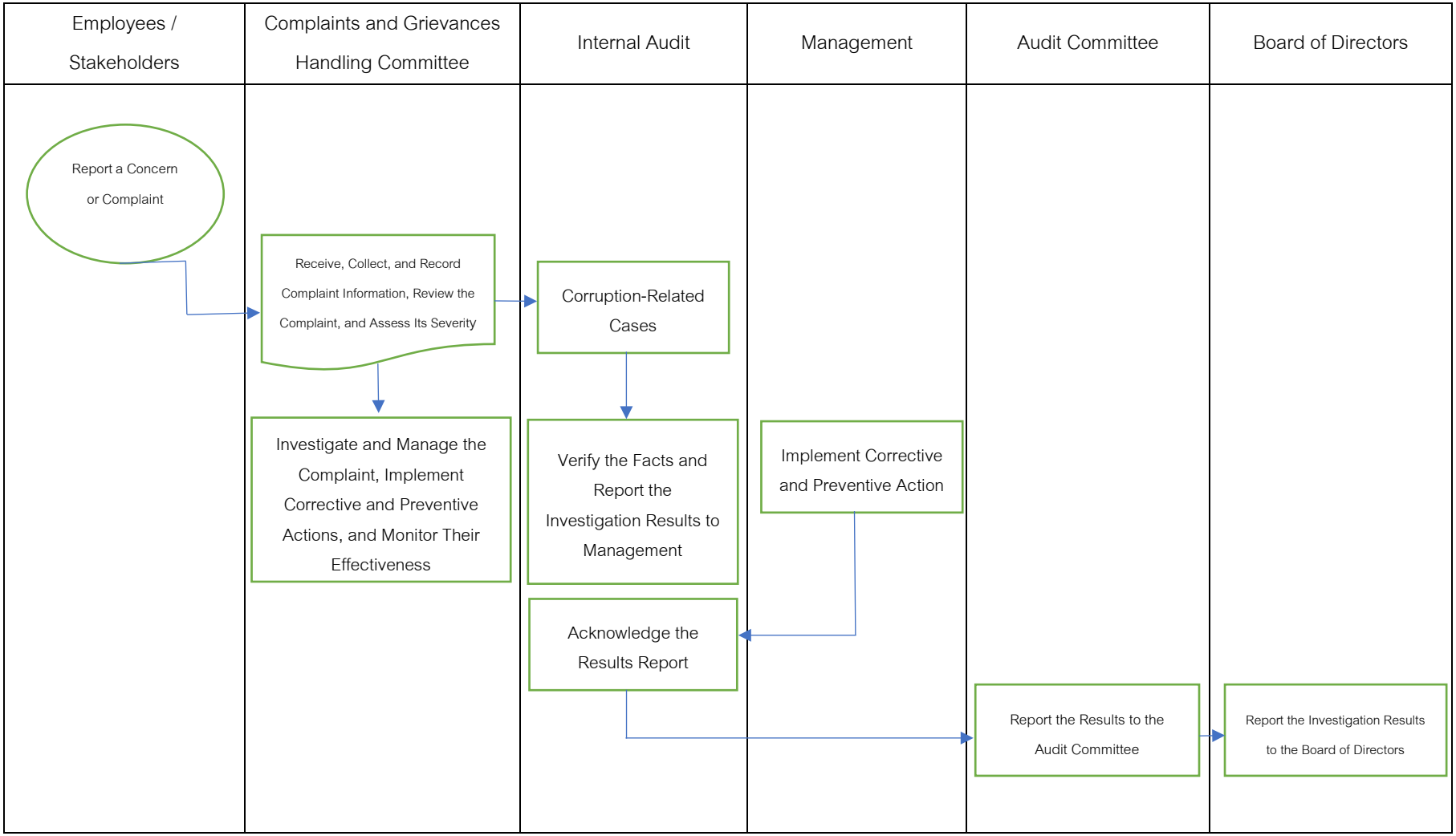
The Company has established channels through which employees and stakeholders may report concerns or complaints regarding suspected fraudulent acts or corruption. These channels are easily accessible and are designed to ensure the strict confidentiality of whistleblowers and complainants. Stakeholders may submit reports or complaints through the following channels:

Internal

1. Immediate supervisors, management personnel, or the Employee Relations (ER) Team, as designated and communicated by the Company.
2. Welfare Committee.
3. Complaint and suggestion boxes installed within the Company's factory premises.
4. Through the Company's website: www.thaiunionfeedmill.com
5. By email: IA.TFM@thaiunion.com

External

1. Through the Company's website: **www.thaiunionfeedmill.com**
2. By mail addressed to:
   Thai Union Feedmill Public Company Limited
   89/1 Moo 2, Rama II Road,
   Kalong Sub-district, Mueang Samut Sakhon District,
   Samut Sakhon 74000, Thailand
   Telephone: +66 (0)34-417-222


Employees / Stakeholders
Complaints and Grievances Handling Committee
Internal Audit
Management
Audit Committee
Board of Directors
Report a Concern or Complaint
Receive, Collect, and Record Complaint Information, Review the Complaint, and Assess Its Severity
Corruption-Related Cases
Investigate and Manage the Complaint, Implement Corrective and Preventive Actions, and Monitor Their Effectiveness
Verify the Facts and Report the Investigation Results to Management
Implement Corrective and Preventive Action
Acknowledge the Results Report
Report the Results to the Audit Committee
Report the Investigation Results to the Board of Directors