



## **Anti-Fraud and Anti-Corruption**

### **Policy and Guidelines**

**CP Future City Development Corporation Limited**



**Revision Log**  
**Anti-Fraud and Anti-Corruption Policy and Guidelines**  
**Charoen Pokphand Group**

Version	Responsible Department	Description	Reviewer	Approver	Date of approval
1	Corporate Governance Department, Charoen Pokphand Group Co., Ltd.	Revised the template in accordance with the policy and guidelines as endorsed by Charoen Pokphand Group Co., Ltd.'s Corporate Governance, Risk and Audit Steering Committee and approved by the Executive Board in August 2021.	-	-	August 2021
2	Corporate Governance Department, Charoen Pokphand Group Co., Ltd.	<ol style="list-style-type: none"> <li>Adjusted the contents under "Intent" section to convey the Group's intent in promoting honest and transparent business operations for the Group's sustainable growth.</li> <li>Added details for all employee groups in the Roles and Responsibilities section.</li> <li>Added guidelines on               <ol style="list-style-type: none"> <li>Revolving Door</li> <li>Conflicts of Interest</li> <li>Supporting and collaborating with the private sector, public sector, and civil society in promoting anti-fraud and corruption</li> <li>Communicating and promoting awareness on anti-fraud and corruption to employees and external stakeholders</li> </ol> </li> </ol>	Corporate Governance, Risk and Audit Steering Committee	Executive Board	September 2023



		<p>4. Added additional laws, Group Policies and Guidelines under the “Related Laws, Regulations, and Policies” section.</p> <p>5. Revised and added relevant definitions in Appendix A</p>			
--	--	--	--	--	--

**Notice:** this table is intended for internal use only.

**Revision Log****Anti-Fraud and Anti-Corruption Policy and Guidelines****CP Future City Development Corporation Limited**

<b>Version</b>	<b>Responsible Department</b>	<b>Description</b>	<b>Reviewer</b>	<b>Approver</b>	<b>Date of approval</b>
1	HR Business Partner Executive	<ul style="list-style-type: none"><li>Establish Anti-Fraud and Anti-Corruption Policy and Guidelines in accordance with Charoen Pokphand Group's Anti-Bribery and Anti-Corruption Policy and Guidelines</li></ul>	Head of HR & Procurement	President	January 1, 2024
2	Sustainability Team	<ul style="list-style-type: none"><li>Revised in accordance with the second revision of Charoen Pokphand Group's Anti-Fraud and Anti-Corruption Policy and Guidelines</li></ul>	Management Committee	President	August 1, 2025

**Notice:** This page is intended for internal use only



## Contents

1. Importance	1
2. Scope	1
3. Objective	1
4. Roles and Responsibilities	2
5. Procedure	4
6. Training	5
7. Whistleblowing	6
8. Policy Guidance	6
9. Penalties	6
10. Related Laws, Regulations, and Policies	6
11. Appendix	7
<b>Appendix A Definitions</b>	<b>8</b>

## **Anti-Fraud and Anti-Corruption Policy and Guidelines**

### **CP Future City Development Corporation Limited**

#### **1. Importance**

CP Future City Development Corporation Limited (the Company) recognizes that fraud and corruption are serious threats that undermine free and fair competition, violate ethical standards, and cause long-term harm to the country, the public, and organizations. Such actions increase business costs and expenses, reduce competitiveness, lower ethical standards in business operations, weaken the governance system, and damage the Company's reputation.

The Company therefore places great importance on conducting business with adherence to corporate values, business ethics, and good corporate governance principles, as well as complying with laws related to anti-fraud and anti-corruption both domestically and internationally. The Company adopts a zero-tolerance policy toward all forms of corruption, whether direct or indirect. It also promotes awareness and a strong sense of responsibility among personnel in combating fraud and corruption, while encouraging relevant stakeholders to adopt practices that prevent corruption. This is to foster a healthy business environment, which serves as a fundamental basis for sustainable business.

#### **2. Scope**

2.1 This Occupational Health, Safety and Working Environment Policy and Guidelines apply to CP Future City Development Corporation Limited and all its subsidiaries where CP Future City Development Corporation Limited has operational control ("Company").

2.2 This document shall be reviewed at least once a year or as necessary.

#### **3. Objective**

To provide directors, management, and staff with fraud and corruption prevention guidelines in every business activity in order to ensure prudent decision-making.

## **4. Roles and Responsibilities**

### **4.1 Board of Directors**

- 4.1.1 Approve the Anti-Fraud and Anti-Corruption Policy and Guidelines.
- 4.1.2 Oversee business activities and their compliance with core values, applicable laws, company regulations, rules, policies and guidelines as well as promote the effective implementation of this Policy and Guidelines.
- 4.1.3 Promote and support a corporate culture of integrity and transparency in business operations.

### **4.2 Management**

- 4.2.1 Determine company regulations and measures for employee implementation.
- 4.2.2 Determine the corporate structure consisting of responsible persons with appropriate roles and responsibilities.
- 4.2.3 Ensure that risk management and internal control systems are in place.
- 4.2.4 Ensure that accounting and financial reporting systems comply with relevant standards.
- 4.2.5 Foster an anti-fraud and anti-corruption corporate culture.
- 4.2.6 Supervise, manage and support the implementation of policies and company regulations.
- 4.2.7 Promote employee understanding of this Policy and Guidelines.
- 4.2.8 Ensure that there is an internal audit process in place.
- 4.2.9 Ensure that whistleblowing and complaints channels, including protective measures for whistleblowers or complainants, are in place.
- 4.2.10 Review performance reports on anti-fraud and corruption, in addition to determining areas for improvement.
- 4.2.11 Report progress to the responsible committee.

#### **4.3 Responsible Department/Persons**

- 4.3.1 Assess fraud and corruption risks and establish internal controls in all activities with potential risks.
- 4.3.2 Establish anti-fraud and corruption due diligence process for the company's business projects and activities as well as of prospective suppliers.
- 4.3.3 Monitor and evaluate the efficiency of compliance with this Anti-Fraud and Anti-Corruption Policy and Guidelines.
- 4.3.4 Develop and review anti-fraud and corruption procedures to reflect evolving risks.
- 4.3.5 Prepare financial statements and disclose financial information in accordance with internationally-recognized financial reporting standards, as well as setting up storage systems for financial documents.
- 4.3.6 Establish human resource management process in line with anti-fraud and corruption measures that encompass employee recruitment, training, performance evaluation, promotion, compensation and benefits, and resignation.
- 4.3.7 Promote awareness, communicate, and advise employees regarding anti-fraud and corruption.
- 4.3.8 Examine and audit operations to ensure their compliance with laws, rules, regulations, policies and guidelines in addition to prepare progress reports.

#### **4.4 Staff**

- 4.4.1 Learn and comply with laws, Policy and Guidelines as well as company regulations.
- 4.4.2 Report or blow the whistle when perceiving potential violation of this Policy and Guidelines.



## 5. Procedure

5.1 Assess risks in all business activities to identify opportunities for fraud and corruption.

5.2 Act with integrity, transparency and comply with laws, policies, Code of Conduct, rules and company regulations, as follows:

### 5.2.1 Offering and Receiving Gifts and Benefits

Do not offer or receive gifts or benefits that may compromise business decisions by complying with company regulations.

In terms of customs or traditions, employees may offer and receive gifts or benefits that do not exceed the value as specified by law or are in accordance with company regulations.

### 5.2.2 Hospitality and Entertainment

Hospitality and entertainment are allowed, provided that the intent is to maintain business relationships with customers and suppliers. However, they must not compromise business decisions, do not exceed the value as specified by law, or are in accordance with company regulations.

### 5.2.3 Facilitating Payment

Facilitating payments must be handled transparently and in accordance with company regulations. The company does not support any facilitating payments that may lead to fraud and corruption.

### 5.2.4 Charitable Contributions and Sponsorship

Charitable contributions and sponsorships must be conducted in accordance with company regulations without expecting any benefits in return or used for the purpose of fraud and corruption.

### 5.2.5 Political Contributions

Conduct business by maintaining political neutrality and not acting in favor of any political parties. Both monetary and non-monetary political contributions must be handled transparently to promote democracy without any intention to induce improper or unlawful behavior.

#### 5.2.6 Revolving Door

The employment of public officials as a company director, advisor, or top executive is allowed only if the public official has subjected to a cooling-off period as specified by local laws and in accordance with company regulations. This is in order to prevent potential conflicts of interest and favors from the public sector.

#### 5.2.7 Conflicts of Interest

Perform duties according to the assigned roles and responsibilities in order to proceed with company objectives without using authority to seek benefits for oneself or related persons.

#### 5.2.8 Acting on Behalf of Company

Communicate the Anti-Fraud and Anti-Corruption Policy and Guidelines to all external persons and entities appointed to represent the company for their understanding and compliance.

5.3 Support and collaborate with local and overseas organizations from the private sector, public sector, and civil society in promoting anti-fraud and corruption.

5.4 Communicate and promote awareness on anti-fraud and corruption to employees and external stakeholders throughout the supply chain.

5.5 Report on performance in relation to this Policy and Guidelines as well as anti-fraud and anti-corruption measures.

## 6. Training

The Company shall communicate and cascade the Anti-Fraud and Anti-Corruption Policy and Guidelines through training programs, conferences, and other various activities to its directors, management, staff and external stakeholders including suppliers, business partners and the general public throughout the supply chain. The effectiveness of training shall be evaluated after each session.

## **7. Whistleblowing**

Report or raise concerns upon witnessing any actions believed to violate this policy and its guidelines. The process shall follow the whistleblowing policy and procedures. Whistleblowers or complainants will be protected, and all information will be kept confidential. There will be no impact on their employment status during or after the investigation process.

## **8. Policy Guidance**

If employees suspect any conduct that could violate laws, company regulations, and this Anti-Fraud and Anti-Corruption Policy and Guidelines, they can seek guidance from their supervisors, responsible departments or persons, the Compliance Department or Legal Department before carrying out any action.

## **9. Penalties**

Employees must cooperate in providing reliable and accurate information to both internal and external authorities during the investigation process. Any violation or failure to comply with this Policy and Guidelines will be subject to disciplinary action in accordance with company regulations.

## **10. Related Laws, Regulations, and Policies**

- 10.1 Laws related to fraud and corruption
- 10.2 The Company's policy and guidelines on giving and receiving gifts or other benefits
- 10.3 Charoen Pokphand Group's Code of Business Ethics
- 10.4 The Company's Code of Business Ethics for Business Partners
- 10.5 The Company's policy and guidelines on anti-money laundering and counter-terrorism and weapons of mass destruction financing
- 10.6 The Company's policy and guidelines on whistleblowing
- 10.7 The Company's policy and guidelines on conflict of interest
- 10.8 The Company's policy and guidelines on risk management
- 10.9 The Company's policy and guidelines on personal data protection



## **11. Appendix**

The following Appendix is attached to this Policy and Guidelines:

### **11.1 Appendix A: Definitions**

## **Appendix A**

### **Definitions**

#### **1. Corruption**

Any misuse of authority to obtain undue benefits in all forms, including the offering and acceptance of bribes. This also covers the proposing, promising, demanding, offering and receiving money, assets, or other benefits to public officials, public agency, private entity, or persons in position of authority, whether directly or indirectly, in order for the receiving party to perform or not perform their duties in return for an improper business advantage.

#### **2. Fraud**

Any wrongful or criminal act intended to result in financial or personal gain for oneself or others, including their spouse, children, relatives, or close acquaintances.

#### **3. Gift**

Monetary or non-monetary items or services that is offered and/or received on special occasions besides personal salary, income, and employment benefits.

#### **4. Benefit**

Items of value, including price reductions that exceed normal trading conditions, entertainment, services, training programs, etc.

#### **5. Traditions**

Any festivals or occasions where gifts may be exchanged as a gesture of congratulations, gratitude, welcome, condolences, or an offer of assistance that is practiced in society.

#### **6. Customs**

Generally accepted activities practiced in accordance to cultural influences.

## **7. Entertainment**

The action of providing amusement or enjoyment in order to make them feel comfortable, content, and happy.

## **8. Hospitality**

The offering of food, drinks or services, including watching a show or a sports event, participating in recreational activities or sports, such as golf, as a special occasion to external parties who has a business relationship with the company.

## **9. Facilitating Payment**

A payment made to government officials in order to secure or expedite the performance of a routine action, including payments to receive special privileges over others.

## **10. Charitable Contributions**

The offering of cash, items, or other assets of value to an agency or charitable organization for public interest without expecting any benefits in return.

## **11. Sponsorships**

Cash, items, or benefits offered to external organizations or persons to promote the company image or reputation.

## **12. Political Contributions**

The offering of financial or non-financial support to politicians, political parties, or politically exposed persons, such as cash, employees, venues, equipment, or other facilities.

## **13. Public officials**

Politicians, government officials or top executives working in state enterprises or government agencies, including members of sub-committees from government departments, state enterprises or government agencies that may provide favors to the company.

#### **14. Conflict of Interest**

Any situation, action, or inaction in which the individual in question has a personal interest that contradicts the company's interests and, as a result, may affect their ability to make decisions or discharge their responsibilities, harm the company's interests, or lead to misconduct or corruption.