Gifts and Benefits

Policy and Guidelines

Altervim Co., Ltd.

Revision History

Gifts and Benefits 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.	1. Adjusted the contents under "Intent" section to convey the Group's intent in fostering a culture that refrains from offering or accepting gifts and benefits that may lead to fraud and corruption. 2. Added details for all employee groups in the Roles and Responsibilities section. 3. Adjusted contents in "Guidelines" section from "receiving approval from their direct supervisor" to "receiving approval from the authorized person based on the company's authorization matrix as stated in company regulations". 4. Added "Charitable contributions or sponsorships to persons" under "Charitable Contributions and Sponsorships" in the Guidelines section.	Corporate Governance, Risk and Audit Steering Committee	Executive Board	September 2023

		5. Added additional laws, Group Policies and Guidelines under the “Related Laws, Regulations, and Policies” section.			

Notice: this table is intended for internal use only.

Revision History

Gifts and Benefits Policy and Guidelines

Altervim Co., Ltd.

Version	Responsible Department	Description	Reviewer	Approver	Date of approval
1	Altervim Co., Ltd.	● Revised in accordance with the first revision of Charoen Pokphand Group's Gifts and Benefits Policy and Guidelines	GRC Working Group	Chief Executive Officer	1 April 2025
2	Altervim Co., Ltd.	● Revised in accordance with the second revision of Charoen Pokphand Group's Gifts and Benefits Policy and Guidelines	GRC Working Group	Chief Executive Officer	1 April 2025

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Gifts and Benefits Policy and Guidelines

Altervim Co., Ltd.

1. Intent

Altervim Co., Ltd. conducts its business with transparency. Therefore, the Company does not support the offering and receiving of gifts or benefits that cause favoritism or conflicts of interest, which can lead to fraud and corruption. These will deteriorate our employees' Core Value of Integrity and Honesty, which will impact our business' long-term competitiveness due to increasing costs, resulting in decreased profitability as well as seriously damaging the Company's credibility and reputation.

2. Scope

This Policy and Guidelines apply to Charoen Pokphand Group, (hereafter "the Group") which includes Charoen Pokphand Group Co., Ltd., and all its subsidiary companies that Charoen Pokphand Group Co, Ltd. has management control. The term "company" hereafter refers to any such company individually that has adopted this Policy and Guidelines. This document shall be reviewed at least once a year, or as conditions require.

3. Objective

To provide directors, management, and staff with practices on offering and receiving gifts or benefits that comply with the law, policies, and regulations of Altervim Co., Ltd.. This is to promote careful business decisions without conflicts of interest, fraud and corruption.

4. Roles and Responsibilities

4.1 Board of Directors

4.1.1 Consider and approve the Gifts and Benefits Policy and Guidelines.

4.1.2 Oversee business activities to comply with 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 the corporate culture in operating with integrity and transparency.

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 Foster a corporate culture that prioritizes refraining from the acceptance of gifts or benefits across the organization.

4.2.5 Supervise, manage, and support compliance with related policies and company regulations.

4.2.6 Promote employee understanding of this Policy and Guidelines.

4.2.7 Ensure that whistleblowing and complaints channels, including protective measures for whistleblowers or complainants, are in place.

4.2.8 Review performance reports related to the offering and receiving of gifts or benefits as well as determine areas for improvement.

4.2.9 Report progress to the responsible committee.

4.3 **Responsible Department/Persons**

4.3.1 Establish rules and practices for the offering and receiving of gifts or benefits.

4.3.2 Maintain a register to keep track of offered and received gifts that specifies their purpose, details, value, including the person or department offering/receiving the gifts.

4.3.3 Maintain a register of relevant documents to be used as evidence for audits.

4.3.4 Promote awareness, communicate, and advise employees on guidelines for offering and receiving gifts or benefits.

4.3.5 Compile and prepare performance reports to be submitted to management.

4.3.6 Examine and audit operations on compliance with company regulations.

4.4 **Staff**

4.4.1 Learn and comply with applicable laws, Policy and Guidelines as well as company regulations.

4.4.2 Communicate to stakeholders regarding this Policy and Guidelines.

4.4.3 Report or blow the whistle when perceiving potential violation of this Policy and Guidelines.

5. Guidelines

5.1 **Offering Gifts & Benefits**

5.1.1 Do not offer or promise to offer gifts or benefits to customers, suppliers, public officials, and related persons which may impact the recipient's business decision or result in misconduct or favors.

5.1.2 Do not offer gifts or benefits to the spouse, children, or acquaintances of customers, suppliers, public officials, and business-related persons.

5.1.3 Gifts or benefits offered with respect to customs or traditions must be valued within the monetary limit as specified by law. Gifts or benefits that exceed the monetary limit must receive approval from the authorized person based on the company's authorization matrix as stated in company regulations.

5.1.4 Gifts offered on special business occasions must not be in the form of cash or cash equivalents.

5.2 **Receiving Gifts & Benefits**

5.2.1 Do not demand or receive gifts, valuables, goods, or benefits from customers, suppliers, public officials, and business-related persons.

5.2.2 Gifts or benefits received with respect to customs or traditions must be valued within the monetary limit as specified by law. For gifts or benefits that exceed the monetary limit, the company should establish gift acceptance procedures for employees to comply.

5.3 **Entertainment and hospitality**

5.3.1 Entertainment or hospitality provided to customers, suppliers, public officials and business-related persons are allowed if the purpose is to foster positive business relations or conducted with respect to local customs. However, they must not impact business decisions, create favors or cause a conflict of interest. Their values must not exceed the monetary limit as specified by law and are in accordance with company regulations. Additionally, entertainment or hospitality must not occur during business negotiations, competitive tender or bidding.

5.3.2 The entertainment and hospitality venue must not breach ethical standards.

5.3.3 Employees are allowed to attend meetings, site visits, training, seminars, and company visits of external parties or suppliers by complying with company regulations.

If the aforementioned business occasion is in the company's best interest but is paid by external parties or suppliers, employees must seek approval from the authorized person based on the company's authorization matrix as stated in company regulations.

5.4 **Charitable Contributions and Sponsorships**

5.4.1 Charitable contributions and sponsorships to legally-registered organizations must not expect reciprocal benefits or be a channel for fraud and corruption. For transparency, contributions and sponsorships must have proof of receipt as evidence in compliance with company regulations.

5.4.2 Charitable contributions or sponsorships to persons must include verification of individuals and take into consideration the risks that may lead to potential fraud and corruption.

6. Training

The Company shall communicate and cascade the Gifts and Benefits 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 blow the whistle any potential wrongdoings related to this Policy and Guidelines by following the Whistleblowing Policy and Guidelines. All whistleblowers or complainants shall be protected from retaliation regarding their employment status and receive remediation, with their information to be kept confidential both during and after the investigation processes.

8. Policy Guidance

If employees suspect any conduct that could violate laws, company regulations, and this Gifts and Benefits 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 fully 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 Anti-Fraud and Anti-Corruption Policy and Guidelines - Altervim Co., Ltd.

10.2 Conflicts of Interest Policy and Guidelines - Altervim Co., Ltd.

10.3 Whistleblowing Policy and Guidelines - Altervim Co., Ltd.