

Anti-Corruption Policy



**United Palm Oil Industry Public
Company Limited**

effectiveness for the year 2025

Anti-Corruption Policy



The Company has a formal anti-corruption policy, which has been reviewed and approved by the Board of Directors as follows:

“ The Company's directors, executives, and employees must not solicit, engage in, or accept any form of corruption, whether directly or indirectly. This applies to all businesses and all related departments of the Company. Compliance with the anti-corruption policy must be reviewed, as well as practices and operational requirements reviewed to ensure alignment with changes in business, regulations, rules, and legal requirements. Any violations of these policies that support, assist, or cooperate with corruption will result in disciplinary action in accordance with the Company's regulations.

The Company recognizes that corruption and fraud have detrimental effects and pose significant obstacles to social and economic development. These acts are unfair business practices, negatively impacting the Company's reputation for business ethics, its competitiveness, and its reputation both domestically and internationally. These practices also diminish the confidence of shareholders, investors, and all stakeholders.

Definition

- Corruption means the abuse of power to obtain undue benefits, giving or receiving bribes in any form, by offering, promising, promising, soliciting, giving or receiving money, property, or any other improper benefit to government officials, government agencies, private sector entities, or persons in charge, whether directly or indirectly, in order for such persons to act or refrain from performing their duties, or to obtain or retain improper business benefits.

Responsibilities

- The Board of Directors has a duty and responsibility to establish policies and oversee the establishment of effective anti-corruption systems to ensure that management is aware of and prioritizes anti-corruption and instills it into the organization's culture.
- The Audit Committee is responsible for reviewing the financial and accounting reporting system, internal control system, internal audit system, and risk management system to ensure that they comply with international standards, are concise, appropriate, modern, and effective.
 - Managing Directors and Executives are responsible for establishing a system and promoting and supporting anti-corruption policies to communicate to employees and all relevant parties, including reviewing the appropriateness of the system and various measures to ensure they are consistent with changes in business, regulations, and legal requirements.
- Executives are responsible for establishing a system of promotion, support and supervision to ensure that employees and all related parties comply with the anti-corruption policy regulations, including reviewing the appropriateness of the system and various measures to ensure they are consistent with changes in business, regulations and legal requirements.
- Affiliated companies must agree to comply with the anti-corruption policy.
- The Board of Directors, executives and employees must comply with the anti-corruption policy and must not be involved in corruption, whether directly or indirectly.
- The Company requires all directors, executives and employees to act cautiously towards any form of corruption.

Scope and guidelines

Giving and receiving bribes

Do not give or receive any form of bribe in return for business benefits, and do not authorize others to give or receive bribes on your behalf.

Gifts, entertainment and other benefits

Giving or receiving gifts, property, entertainment, or any benefits from customers, business partners, or those involved with the Company must comply with the Code of Ethics regarding giving or receiving gifts, property, or any other benefits.

Political assistance

The Company has a policy of not assisting or supporting any political party, political group, or politician, either directly or indirectly.

Charitable donations, public benefits and sponsorships

The Company provides for charitable, public benefit and support donations as follows:

- i. It is transparent, legal, ethical, and does not expect any business returns. It also does not involve actions that harm society as a whole.
- ii. Follow the procedures for reviewing and approving charitable, public benefit, or sponsorship donations in accordance with the Company's regulations (Reference: Code of Ethics on Charitable Donations and Sponsorships).
- iii. In case of any doubts that may have legal implications, consult a legal advisor.

However, the Company may consider providing necessary support in terms of coordination and facilitation in accordance with legal procedures or relevant regulations, including the provision of gifts on occasions and festivals as deemed appropriate.

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Those who commit corruption are considered to be violating the Company's ethics and will be subject to disciplinary action in accordance with the Company's regulations. They may also face legal penalties if the act is illegal.

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Scope and guidelines (continued)

- The Company is committed to creating and maintaining a corporate culture that upholds the principle that corruption is unacceptable in both public and private sector transactions.

- Directors, executives, and employees at all levels must not neglect or ignore any acts that may constitute corruption related to the Company. They must notify their supervisors or responsible persons and cooperate in the investigation of the facts. They must also provide channels for receiving complaints from outside parties, in accordance with the Company's regulations.

The Company shall provide fair treatment and protection to employees who refuse to engage in corruption or report corruption involving the Company. The Company shall not demote, punish, or otherwise adversely affect employees who refuse to engage in corruption, even if such action causes the Company to lose business opportunities.

Directors and executives at all levels of the Company must demonstrate honesty and serve as good examples in complying with the anti-corruption policy. The Human Resources Department is responsible for disseminating knowledge, creating understanding, and encouraging employees at all levels to seriously and continuously adhere to the anti-corruption policy, and for making it part of the organization's culture.

- This anti-corruption policy covers the entire human resource management process, from recruitment and selection, promotion, training, and employee performance evaluation. Supervisors at all levels are required to communicate and ensure understanding with employees, ensuring effective implementation of the policy in business activities under their responsibility.

- Any action taken in accordance with the anti-corruption policy shall be in accordance with the guidelines set forth in the Good Corporate Governance Policy, the Business Ethics Manual, the Company's related work regulations and rules, as well as any other guidelines that the Company may establish in the future.

- The Company has established a policy to publicize and promote its anti-corruption policy, including channels for reporting complaints or suggestions within the Company, through both internal and external media, such as e-mail, announcements on the Company's website, annual reports, and orientation for directors and employees. This policy is implemented under Thai anti-corruption law.

Preventing the use of insider information of the company

- Directors and executives are required to report their holdings of the Company's securities and any changes in their holdings to the Securities and Exchange Commission (SEC) in accordance with Section 59 of the Securities and Exchange Act B.E. 2535 (1992) within three business days from the date of purchase, sale, transfer, or receipt of transfer, and to submit a copy of the report to the Company Secretary. Executives are also required to report their holdings of the Company's securities to the Board of Directors every quarter. This includes compliance with any legal provisions that may be amended in the future (if any).

Directors, executives, managers and employees who have knowledge of the Company's inside information are prohibited from disclosing such inside information to outsiders or persons who are not involved in the matter, and are prohibited from trading the Company's securities during the period of 1 month before and at least 1 day after the date on which the Company's financial statements are released to the public.

Directors and senior executives must notify the Board of Directors or their designated persons of the purchase or sale of the Company's securities at least one day in advance of the purchase or sale of the Company's securities, in order to report to the SEC Office within three business days of the purchase or sale of the securities, as stipulated by the Securities and Exchange Act.

Directors, executives, managers, and employees are prohibited from using the Company's internal information that has not yet been disclosed to the public, which is material to the change in the price of the Company's securities, for personal gain and/or to persuade others to buy and sell the Company's securities. If the above-mentioned regulations are violated, the Company will take legal action and punish the offender.

Executives are required to report transactions exceeding 500,000 baht, with the Audit and Corporate Governance Committee reviewing the transactions before presenting them to the Board of Directors every quarter.

Preventing conflicts of interest

- Directors, executives, or other persons who agree to enter into related transactions or transactions that may involve conflicts of interest, and transactions regarding the acquisition or disposal of significant assets of directors, executives, or related persons, as defined in the SEC and Stock Exchange of Thailand announcements in effect at the time of such transactions, must strictly comply with the criteria and procedures prescribed in such announcements. The Company has established measures or procedures for approving such transactions as follows:
- Persons with a conflict of interest or who may have a conflict of interest are prohibited from approving transactions related to them.
- Pricing or compensation shall be determined in accordance with normal business practices and general commercial terms, taking into account the Company's interests as the primary consideration.

The Audit and Corporate Governance Committee shall consider and provide an opinion before making such a transaction. If the Audit and Corporate Governance Committee does not have the expertise to provide an opinion on a particular matter or item, the Company shall arrange for an independent expert to provide an opinion to the Audit and Corporate Governance Committee for consideration and reviewing before presenting it to the Board of Directors and the shareholders' meeting for consideration and approval.

* The Company shall disclose such transactions in accordance with the rules and procedures prescribed by the SEC and the Stock Exchange of Thailand.

- Executives may make related party transactions that occur only with the Company and its subsidiaries if those transactions fall into one of the following categories:
- It is a commercial agreement of the same nature as a reasonable person would make with a general contracting party in the same situation, with commercial bargaining power without the influence of the person being a director, executive or related person.
- It is a reasonable advance payment arising from the normal course of business, and is charged as actually paid.

Responsibility to Stakeholders

The Company has a policy to protect the rights and benefits of various stakeholder groups, including employees, shareholders, creditors, customers, business partners, competitors, communities, and society. However, because stakeholder expectations may differ, the Company carefully considers the legal rights each group is entitled to and ensures that such rights are protected and treated with caution. Guidelines for responding to stakeholder needs have been established in the Stakeholder Policy and Guidelines, which are published on the Company's website.

- Human rights policy
 - Business ethics
 - Sustainability Policy
 - Corporate Governance Policy
 - Personal Data Protection Policy
 - Safety, Occupational Health and Working Environment Announcement

Compensation in the event of rights violations

- In the event that a stakeholder suffers damage due to a violation of their legal rights by the Company's actions, the Board of Directors will promptly correct any defects or impacts without delay, including finding measures to prevent such incidents from recurring, and will consider appropriate legal compensation for the affected party.

Measures to take action against those who do not comply with the said policies and practices

- For general offenses such as not following policies, causing damage to the company's reputation, etc., the company will take disciplinary action in accordance with the company's regulations and/or take legal action depending on the nature of the offense and the severity of the impact.
- Offenses related to finance, corruption, use of inside information, conflicts of interest, shall be dealt with as follows:
 - In the event that directors, executives, managers and employees intentionally commit a criminal offense under the Securities and Exchange Act, the Company will take one or more of the following punishments:
 - (1) Deduct salary, wages or other compensation and benefits received; (2) Dismiss, fire or remove from being a director, executive, manager or employee, assuming that the person has intentionally caused damage to the company. If the offender is a director of the company, present the matter to the shareholders' meeting for consideration of punishment; (3) Report the offence to the Stock Exchange of Thailand and/or the SEC.
 1. (4) Report to the police and take legal action. (5) Take any other action in accordance with the resolution of the Company's Board of Directors or the Company's shareholders' meeting.

The background is a solid green color. On the left side, there is a series of white, wavy, concentric lines that curve from the top left towards the bottom right, creating a sense of motion and depth. The lines are closely spaced and vary in length, giving the impression of a stylized wave or a series of overlapping paths.

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