



## Anti-fraud and Corruption Policy

NR Instant Produce Public Company Limited

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### Introduction

NR Instant Product Public Company Limited operates business with an emphasis on anti-fraud and corruption, and adherence to morality, ethics, and transparency as well as responsible to all stakeholders. Therefore, the Company has prepared a written “anti-fraud and corruption policy” including guidelines and procedures for anti-fraud and corruption in all forms and communicate this policy to external stakeholders so that all business operations which may be at risk of fraud and corruption are carried out carefully in every step with a commitment to prevent and fight against fraud and corruption in both direct and indirect forms by adhering to "Corruption is on zero-tolerance, either it conducts with public or private sectors "

Furthermore, the anti-corruption policy is applicable to employees in every levels. Directors, executives, employees as personnel of the Company must comply with this policy including business ethics by not involving in corruption and corruption, both directly and indirectly for the benefit of the Company, oneself, family, and acquaintances. The Company encourages its subsidiaries, associates, joint ventures, affiliates and trading partners to adopt anti-corruption policy as a guideline as well.

### Scope

This anti-fraud and corruption policy covers both domestic and international business transactions and all relevant departments including one or more operators which may be employees, executives or third parties involved to act for their own benefits or against comrades unlawfully benefits herein not limited only in the form of money, but also related to other matters which may not be directly related to the money or to maintain any other benefits that are inappropriate according to the Code of Business Ethics and Code of Conduct.

Apart from that, anti-corruption guidelines, anti-corruption policy and the management of corruption risks count as a part of "Anti-Corruption Policy" which has been approved by the Board of Directors by establishing measures to prevent, detect and respond to corruption and corruption and used in conjunction with the “Corporate Governance Policy”, “Code of Business Ethics” and “ Other Related Operation Manuals.”

### Definitions

“**Company**” means NR Instant Produce Public Company Limited, its subsidiaries, associates and affiliates registered both in Thailand and abroad which is under the control of NR Instant Produce Public Company Limited.

“**Executives**” means the Chief Executive Officer, C-level officer, Divisional Directors and General managers.

**“People of the Company”** means directors, executives and employees at all levels of NR Instant Produce Public Company Limited, its subsidiaries, its associates and its affiliates registered both in Thailand and abroad which is under the control of NR Instant Produce Public Company Limited.

**“Person associated with the Company”** means an agent, affiliates and any person acting for / or on behalf of NR Instant Produce Public Company Limited, regardless of whether or not having the authority.

**“Fraud”** means seeking unlawful benefits for oneself or others, or taking personal advantage over the public, such as embezzlement of company assets, forgery of documents, malfeasance or misconduct, fraudulent disbursement, etc.

**“Corruption”** means bribery in any form by offering promises of money, property, or any other benefit to government officials, government agency, private agency, or those who have either direct or indirect duties for such persons to perform or refrain from performing their duties which is given or maintain any other interests that are inappropriate for business, except in the case where laws, regulations, announcements, requirements are permitted.

**“Gifts”** mean anything that has money or non-monetary value given for hospitality on various occasions.

**“Hospitality”** means arrangements or expenses for accommodation, travel, food, beverages and anything relevant for the trip to visit the place, visit, including providing business knowledge and understanding and other expenses that are directly related to business practices or commercial custom.

**“Donation”** means giving money or non-monetary things to other agencies or organizations for charitable or public benefit to help or support society, community or people who are in trouble.

**“Sponsorship”** means money paid to or received from customers, vendors and business partners with the business purpose, brand, or reputation of the Company to be beneficial for building trade credibility and helping strengthen business relationship.

**“Bribery”** means accepting or giving a gift, facilities, whether in the form of money, goods, or other benefits.

**“Facilitation Payment”** means informal expenses paid to both government officials and public, representatives, and agencies for such persons to carry out the process, accelerate the process or facilitate the performance of routine duties of the officers.

**“Revolving Door”** means a person who is or used to be a government official works for the Company and may rely on relationships or inside information to benefit the Company or causing a conflict of interest in the duties of a government agency or a regulatory body for business under supervision of the Company in which the result of the certain action aims for unfair business advantages or establishing policies that benefit to the companies that former government officials worked for.

**"Conflicts of Interest"** means conflicts between personal interests and common interests, situations or actions that directors, executives, and employees of the Company with personal interest which affects the decision or the performance of duties in the position that the person is responsible for and affects the public interest in which such actions may occur consciously or unconsciously either intentionally or unintentionally which has a variety of formats until it become a common practice without regarding it as an offense causing that person to lack of a fair decision due to priority of personal interests.

**"Political Contribution"** refers to monetary or non-monetary support from political party, political alliance, political authority, including candidates for any political election. This includes lending or donating equipment, providing free technology services including advertising, promoting or supporting and/or encouraging people to participate in political activities on behalf of the Company in order to gain a commercial advantage or for the benefit of the Company or personal interest.

**"Fraud in procurement"** means the potential for fraud and corruption in the procurement process. Therefore, it is necessary to proceed with prudence, transparency, accountability and in accordance with the Company's regulations.

**"Fraud in reporting"** means the amendment of various report either financial, such as financial statements, financial records, or non-financial reports to conceal embezzlement or improper actions or for the benefit of oneself and others resulting in inaccurate financial statements, financial records, or other reports of the Company.

Anti-Corruption Policy are as follows

1. People of the Company must perform the following:
  - 1.1 Not offer or promise Bribery and Facilitation Payment both directly and indirectly with officials, representatives, agencies of both public and private sectors including those involved in order to have a reward that is mutually beneficial or seeking benefits related to the Company or personal interest;
  - 1.2 Not accept or demand for bribery and facilitation payment either directly or indirectly from officials, agencies, representatives of both the public and private sectors including those involved for the benefit of the agreement, business contract, or personal interests;
  - 1.3 Not provide political contribution;
  - 1.4 Not accept donations, sponsorship including not accepting gifts, except receiving the gifts in accordance with the Company's anti-fraud and corruption guidelines;
  - 1.5 Give gifts, hospitality, donations and sponsorships (other than section 1.3) with transparency and evidence of expenditure showing the value of the assets in order to be able to inspect and have clear

objectives and act in accordance with laws, regulations, notifications, regulations, customs and traditions or trade customs only.

2. Appointment or employment of government employees (Revolving Door) as people of the Company can be conducted given that person must comply with anti-fraud and corruption policy and guidelines including strictly preventing conflicts of interest policy and practices.
3. People of the Company must comply with the Company's Articles of Association, Code of Conduct without seeking any benefit in a manner that may cause a conflict of interest with the Company by taking into account the interests of the Company
4. The Company's people have a duty to complaints to the person as specified in the whistleblowing channel on website, e-mail or by postal mail of the Company, if the fraud or corruption or behaviors which are likely to be corruption are found, including to cooperate in investigation. If there is any doubt on the execution of anti-corruption policy and guidelines, the Company's People can consult with supervisors, human resources and administration department, or anti-corruption working group via electronic mail, telephone, LINE application.
5. The Company shall provide fairness and protection of person who refuse to commit fraud and corruption, file the complaints about corruption related to the Company, or cooperate in the investigation for determination of fact. No personnel shall be demoted, punished or negatively affected by such actions.
6. Person who violate the Company's anti-fraud and corruption policy will be subject to disciplinary actions including warning, probation, suspension and termination of employment, and/or be subject to penalties in accordance with applicable laws.
7. The Company realizes the importance of communication and public relations to create knowledge and understanding of people of the Company and all stakeholders.

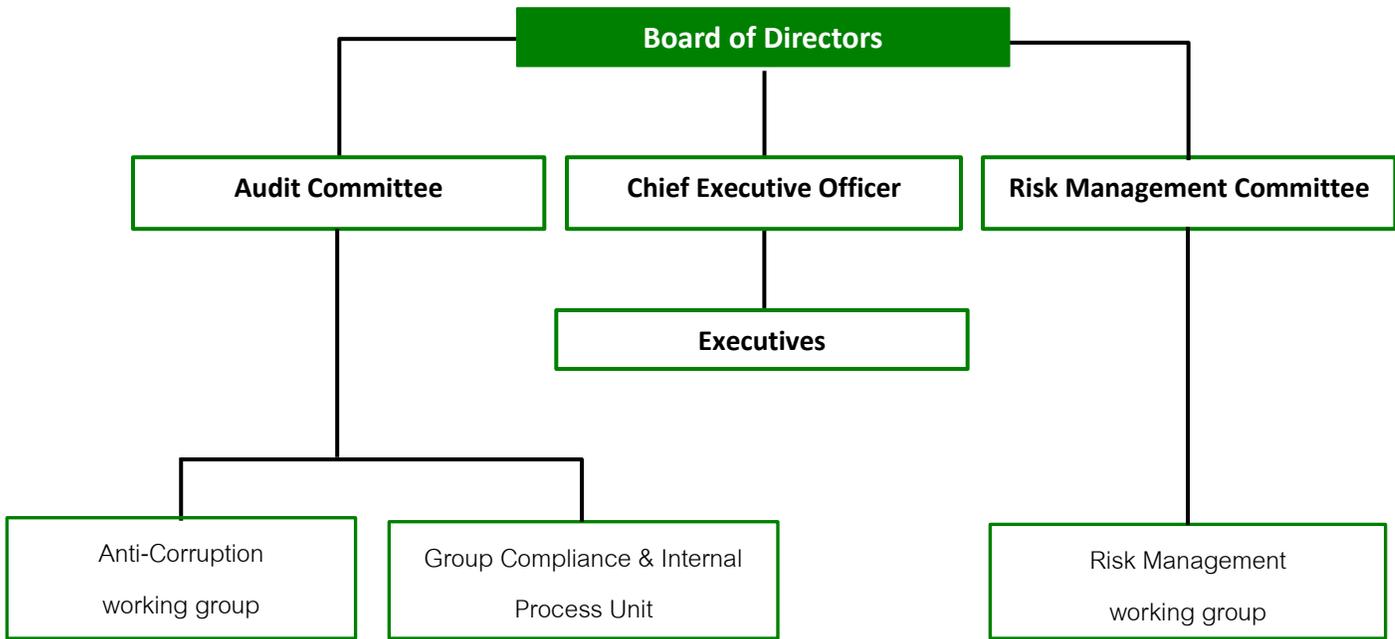
### Duties and Responsibilities

The Company has defined duties and responsibilities related to anti-fraud and corruption as follows:

1. Board of Directors is responsible for establishing anti-fraud and corruption policy and putting in place effective anti-fraud and corruption systems.
2. The Audit Committee has the following duties:
  - 2.1 To review the anti-fraud and corruption policy, provide useful suggestions for the preparation and improvement of such policies to be up-to-date and concrete and present to the Board of Directors;
  - 2.2 To ensure compliance with anti-fraud and corruption policy and guidelines, review the internal control system and internal audit system of the Company to ensure compliance with anti-fraud and corruption policy and guidelines and report to the Board of Directors.
3. The Risk Management Committee is responsible for assessing and handling with fraud and corruption risks as well as reporting to the Board of Directors.

4. Executives has the following duties:
  - 4.1 To define anti-fraud and corruption guidelines;
  - 4.2 To review the anti-fraud and corruption policy, assess fraud and corruption risks and handle such risks as well as provide useful recommendations for implementing the up-to-date and concrete version and present to the Audit Committee;
  - 4.3 To promote and encourage people of the Company to perform their duties in accordance with anti-fraud and corruption policy and guidelines by ensuring that the systems and procedures are relevant with the principles of good corporate governance and cultivating anti-fraud and corruption mindset as a part of organizational culture.
5. Anti-corruption working group has the duties as follows:
  - 5.1 To establish anti-fraud and corruption policy, review annually, and present to the management team if there is any amendment;
  - 5.2 To establish anti-fraud and corruption guidelines, review annually, and present to the management team if there is any amendment;
  - 5.3 To communicate and provide recommendations to people of the Company on anti-fraud and corruption policy and guidelines.
6. risk management working group is responsible for assessing the fraud and corruption risk, establishing measures to handle with fraud and corruption risks related to the Company's business operations, reviewing annually and presenting to the Risk Management Committee if there is any revision.
7. Group Compliance & Internal Process unit is responsible for monitoring operations to ensure the compliance with anti-fraud and corruption policy and guidelines in accordance with the authority, regulations, and related laws and regulations and reporting to the Audit Committee.

## Anti-fraud and Corruption Structure



### Receiving Complaints and Protection of Reporters

The people of the Company must not be neglected or ignored when they encounter actions that may violate the Anti-fraud and corruption policy. The Company provides whistleblowing channels and protection of whistleblowers when the people of the Company want to complaint including advice on the implementation of the anti-fraud and corruption policy in accordance with the complaints policy of NR Instant Produce Public Company Limited.

### Penalties

The Company has procedures to punish person who do not comply with anti-fraud and corruption policy. This penalty includes termination of employment. Provided that the Company deems it necessary, any action that violates or does not comply with this policy either directly or indirectly shall be considered as applicable in disciplinary actions set by the Company and/or by laws. In case of persons related to the Company, if the Company encounters any action that is inconsistent with this policy, the Company may consider terminating the legal relationship. Therefore, the people of the Company including those who are related to the company must understand and follow the anti-fraud and corruption policy for every step of the operation. Allegations of frau or corruption can cause a reputational damage to the people of the Company and can deteriorate the image of the

Company despite baseless accusations. If any action is found to be contrary to this policy, please notify via whistleblowing channels provided by the Company.

1. The Company imposes penalties on directors, executives and employees who do not comply with anti-fraud and corruption policy, which is punishable by termination of the position of director or sanctions under disciplinary action requirements for executives and employees and take legal actions, rules, or regulations including good corporate governance related to such offences.
2. In case of persons related to the group of companies or customers, business partners, business partners fail to comply with anti-fraud and corruption measures, the Company may consider as a void transaction with such related parties or customers, vendors, business partners.

The Company reviews the anti-fraud and corruption policy annually corresponding to the changes in laws, regulations, relevant requirements by proposing to the Board of Directors for approval such policy.

This anti-fraud and corruption policy was approved by the Board of Directors of NR Instant Produce Public Company Limited in the meeting No. 6/2022 dated 15 August 2022 effective on 16 August 2022 onwards.

Announced at 16 August 2022

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(Mrs. Kesara Manchusree)  
Chairman of the Board of Directors