



Anti-Corruption Manual

Thai Vegetable Oil Public Company Limited

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Part 1

Anti-Corruption Policy

Thai Vegetable Oil Public Company Limited (“The Company”) adheres to business operations with transparency and fairness, following the principles of good corporate governance with honesty, commitment to social responsibility, and all groups of stakeholders. The Company has reviewed the “Anti-Corruption Policy” to ensure that the “Anti-Corruption Policy” covers the determination of responsibility and appropriate way of action to prevent corruption in all activities of the Company and so that business operations that may have risks of crime are considered and treated carefully.

Definition

Corruption means bribery is an offer, a pledge, or a promise, including receiving claims for money, assets, or any other benefits that are inappropriate to officials, agencies, public and private, or those responsible for, whether directly or indirectly. That bribery is for such persons to perform or refrain from performing their duties to acquire or maintain business or any other inappropriate benefits, however, except in the case of laws, regulations, announcements, regulations, local customs, or trade customs.

Company personnel means directors of the Company, executives, and employees of the Company or its subsidiaries.

Subsidiary means a subsidiary according to the consolidated financial statements of the Company.

Anti-Corruption Policy

The Company's personnel do not directly or indirectly demand, act, or accept any form of corruption for the benefit of the Company, oneself, family, friends, and acquaintances, covering all businesses and all related departments. They will be regularly reviewing the Anti-Corruption Policy's implementation and reviewing the practice guidelines and terms of operation to comply with changes in business, rules, regulations, and legal requirements.

Part 2

Duties and Responsibilities

1. **Board of Directors:** duties and responsibilities are for formulating policies and supervising to have a system that supports effective anti-corruption to ensure that the Company's personnel are aware of and attach importance to anti-corruption and instilled into the corporate culture.
2. **Audit and Risk Management Committee:** duties and responsibilities are to review financial reports, internal control system, internal audit system, and risk management system, receive corruption clues, and review the Company's business operations following anti-corruption measures. Then, report the internal audits regarding anti-corruption measures to the Board of Directors.
3. **Environmental, Social, and Governance (ESG) Committee:** duties and responsibilities for setting policies and guidelines for environmental, social and corporate governance operations appropriately, adequately and efficiently to make the Company's business operations transparent, be fair to all groups of stakeholders in a sustainable way, and achieve goals. It also considers setting guidelines, recommend policies/practice guidelines regarding the Company's Code of Conduct as well as policies/measures against corruption. It also includes making recommendations and reviewing policies/practices concerning responsibilities to various groups of stakeholders of the Company as well as providing supervision and advice, and follow up on the progress of implementation and evaluation of good corporate governance performance.
4. **The Risk Management Working Group:** duties and responsible for developing risk management plans, analyzing impacts and preparing contingency plans. It also monitors the implementation of corruption risk management measures and key risk indicators, and reports on the performance of anti-corruption measures to the Audit and Risk Management Committee.
5. **Executives:** duties and responsibilities are establishing a system and providing support for the Anti-Corruption Policy, and communicating to employees and all related parties to review the suitability of the systems and measures to comply with changes in business, rules, regulations, and legal requirements.

6. **Office of the Internal Audit:** duties and responsibilities are inspecting and reviewing the operation to ensure that it is under the policies, practices, authority regulations, laws, and regulatory requirements to ensure that there is an appropriate and sufficient control system against potential corruption risks; and report to the Audit and Risk Management Committee.
7. **Office of Secretariat:** duties and responsibilities are preparing, disseminating, communicating, and giving advice on Anti-Corruption Policy so that directors, executives, employees, and stakeholders can operate under the Anti-Corruption Policy and the Company's Code of Conduct, as well as improve the Anti-Corruption Policy to comply with the rules, regulations, laws, and including disseminating to the public through various channels defined.
8. **Employees:** duties and responsibilities are to behave in accordance with the Anti-Corruption Policy. In case of doubt or witnessing any violation related to this policy, employees must report to the supervisor or proceed through the reporting channels under the procedures set out in the complaints protocol.

Scope of Application

This policy applies to Company personnel.

Guidelines

1. Company personnel at all levels must comply with the Anti-Corruption Policy and the Company's Code of Conduct and do not take action, demand, or get involved in corruption, whether directly or indirectly, for the benefit of the Company, oneself, family, friends, and acquaintances.
2. Company personnel will not neglect or ignore whenever meet any action that is considered corruption related to the Company. Must notify the supervisor or the person in charge, or notify via channels for reporting complaints and whistleblowing, and must be cooperated in investigating various facts. If any questions or inquiries, consult the supervisor or a person designated to be responsible for monitoring compliance with the Company's Code of Conduct through various channels.
3. According to the measures to protect the complainants who cooperate in the investigation, The Company provides fairness and protection to the employees who refuse or report corruption. As specified by the Company in the complaints protocol,

without demotion, penalties, or any negative consequences that affect job duties, even the action will cause the Company to lose business opportunities.

4. People who commit corruption, which violates the Company's Code of Conduct and is contrary to the law, must be considered disciplinary action as determined by the Company. It may include termination of employment, compensation for damage, and civil or criminal penalties.
5. The Company is committed to creating and maintaining the corporate culture who adhere to the belief that corruption is unacceptable in both public and private transactions.
6. The Company realizes the importance of disseminating, educating, and understanding the policy and anti-corruption measures by providing communication both within the Company. Moreover, other people or other companies who have to perform duties related to the Company or may affect the Company related to matters that must be complied with the Anti-Corruption Policy.
7. Personnel of the Company at all levels refrain from accepting gifts, assets, or any other benefits in any case. Moreover, be careful about giving gifts, assets, or other benefits, including entertainment. However, giving must be under tradition. Value not more than 3,000 Baht per person per opportunity or on essential business occasions and must not affect decision-making in the performance of duties.
8. Charitable donations and financial support must be transparent and legal by ensuring that the donation and the subsidies were not used as an excuse for bribery.
9. Risk assessment is the foundation of anti-corruption measures. The Company provides an assessment of potential corruption risks to the Company at least once a year and reports to the Board of Directors. It also reviews anti-corruption measures to be appropriate to prevent risks to an acceptable level.
10. The Company has arranged an internal control system covering financial matters and executing accounting processes and record-keeping, including the other processes that are at risk of corruption. It regularly reviews the internal control system to ensure that the vulnerable internal processes to corruption are still effective.
11. The Anti-Corruption Policy covers the personnel management process from recruiting or selecting personnel, promotion, training, employee performance appraisal, and reward by requiring supervisors at all levels to communicate with employees to be used to supervise the practice to be effective.

12. The Company provides supervision, monitoring, and review as follows:

12.1 **Office of Secretariat:** Review the appropriateness of the Anti-Corruption Policy annually, and propose to the Audit and Risk Management Committee Board of Directors to approve if any changes are made, including supervising and monitoring the implementation of this policy and give advice continually if any improvements are required. It must be done as soon as possible.

12.2 **Office of the Internal Audit:** The internal control systems regularly audit the processes to ensure that the internal control system effectively fights corruption. The audit results will be discussed with the relevant parties to find appropriate solutions and will report to the management, and the Audit and Risk Management Committee was further informed.

Penalties

Suppose the Company's personnel violate the Anti-Corruption Policy. In that case, it is an act that violates the Company's Code of Conduct and will be subject to disciplinary action according to the Company's personnel regulations. The Company will appoint the investigating committee as appropriate to the case. In addition, the penalties prescribed by law may be imposed if the action is illegal.

It is hereby announced for acknowledgment and strict compliance as a whole, which will come into effect from 20 December 2024.

Announced on 20 December 2024

- *Signature* -

(Dr. Suvit Maesincee)

Chairman

Remark: The Chairman of the Board of Directors Meeting No. 7/2024 on 20 December 2024, resolved to approve the review of the Anti-Corruption Manual.

Part 3

Implement the Anti-Corruption Policy Measures

The Company has established the Anti-Corruption Policy and measures to implement such policies. The Company's personnel to understand and strictly adhere to a Code of Conduct, Corporate Governance Policy, Regulations, Manuals, and any other practices related to this Anti-Corruption Policy.

1. Giving gifts, souvenirs, or any other benefits

According to tradition, giving gifts, assets, or any other benefits can be done to show a good relationship. It is not an incentive to make unjustified decisions by employees and must not influence judgement when performing duties.

Practice:

- 1.1) Giving gifts and souvenirs according to tradition or significant business opportunities can do without inducing an act or refraining from performing duties. It does not cause lenient consent to improper business deals and is not contrary to relevant laws and local customs.
- 1.2) Giving gifts and souvenirs should be carried out to the same standard to avoid discrimination.
- 1.3) Do not give gifts, souvenirs, assets, or any other benefits to spouses, children, or related persons of government officials, customers, business partners, and contacts. By circumstances, it is considered a substitute.
- 1.4) Giving gifts or souvenirs must be approved by a hierarchical supervisor. It complies with the regulations governing approval and operation and procedures of the manual of the accounting and finance department.

2. Receiving gifts, souvenirs, or any other benefits

The Company has the policy to refrain from accepting gifts, assets, or any other benefits in all cases and must notify third parties of the do-not to accept gifts policy.

Practice:

- 2.1) Company personnel or their families do not solicit or accept gifts or any other benefits from the contractor, subcontractors, customers, business partners, or those involved

in the Company's business in any case, which may affect the decision to perform the duty with bias or embarrassment or a conflict of interest.

- 2.2) If it is necessary to receive gifts, souvenirs, or any other benefits that cannot be returned, have employees report to the supervisor, the report form for receiving gifts, assets, or any other benefits can be downloaded at the website www.tvothai.com under Corporate Governance menu Other documents topic and submit to the Office of Secretariat together with the said report to carry out the collection of such items and donate to outsiders or agencies for charity or public benefit, except:

2.2.1 In the case of consumable items with an expiration date of less than one month, it shall be at the discretion of the department supervisor who receives the gift for management.

2.2.2 In the case of giving a calendar and diary used as a public relations media, employees can receive them as personal gifts.

2.2.3 In the case of receiving gifts or souvenirs under business to business, for example, a cooperation agreement, etc. Those gifts and souvenirs are the property of the Company.

3. Entertainment

Entertainment means entertainment, food, drink, or any service whether it is performances, watching sports, participating in recreational activities or sports, for example, golfing, etc., that occur on special occasions according to the tradition given to outsiders doing business or dealing with the Company.

Practice:

- 3.1) Any entertainment fee that spending on business entertainment can do, however, it must be reasonable and does not affect the decision-making in operation or cause conflicts of interest.
- 3.2) The Company does not have any policy to entertain third parties for doing business or dealing with the Company, both public and private agencies. In order to avoid any action related to bribery, it may cause influence or motivate to make any decision and impact the unjustified performance. Moreover, it impacts the Company's operations unless the entertainment takes place on special occasions, followed by the etiquette practiced in society or under the Company's budget or appropriate occasion, including custom or tradition. All these to maintain a good business

relationship without expecting anything in return. In this regard, it shall be under the regulations of the approval authority as specified occasion.

- 3.3) The hierarchical supervisor must approve any entertainment expenses. It complies with the regulations governing approval and operation and procedures of the manual of the accounting and finance department.

4. Charitable Donations and Financial Support

Charitable Donations are one way to help society.

Sponsorships are financial contributions paid to customers, business partners, etc., for the Company's business, brand, and reputation or to strengthen business relationships.

Charitable Donations or Sponsorship may be considered indirect bribery. Alternatively, it could be used as an excuse or a path for corruption to influence decision-making, resulting in the performance of unjustified duties.

Practice:

- 4.1) Be a reliable organization and legally established.
- 4.2) Be cautious in making donations and sponsorships, whether monetary or physical, by acting on behalf of the Company in a transparent, legal manner, and under regulations governing the authority to approve and operate.
- 4.3) Should not make any direct donation or sponsorship to any person on behalf of an individual organization unless the details are clearly stated in the letter of support and have proof of support in writing.
- 4.4) There is an audit, approval, and review with clear documentary evidence and under regulations governing the approval and operation power of the Company. It can ensure that donations or sponsorships are not used as a pretext for corruption.

5. Political Contributions

Political contributions refer to any support in financial or other types of support for political activities. It includes giving things or services, advertising, promoting, or supporting a political party to encourage employees to participate in political activities under the name of the Company to obtain an advantage in the trading business.

Practice:

- 5.1) The Company is a politically neutral organization that does not support political parties, political activities, or any politician, whether directly or indirectly.

5.2) Company personnel can participate in political activities on their behalf outside of working hours, however, not on behalf of the Company. Also, including the Company's resources must not be used to support political parties' political activities, political groups, or any politician.

5.3) Company personnel should refrain from expressing political opinions that lead to conflicts within the Company.

6. Facilitation Payments

Facilitation payments are small payments to induce government officials to expedite action or to ensure that any action will be taken following the duties which such person is already obligated to perform;

Practice:

Do not pay any facilitation payments to government officials.

7. Hiring Government Employees

A **Government official** means a government official, employee, employee, group of persons, or working in an administrative agency. Dispute Tribunal A committee or person to whom the law is authorized to issue any rules, orders, or resolutions affecting an individual.

Practice:

Do not hire government employees to work that will cause conflicts of interest.

Operational guidelines for employees in dealing with government agencies, government officials, or other general organizations.

In order to prevent the risk of corruption, working with government agencies, government officials, or other organizations about disbursement under any circumstances, employees must do the following:

Practice:

- 1) Follow the operating procedures regarding the preparation of payment vouchers and payment of checks in the manual of the accounting department strictly.
- 2) Any sponsorship to government agencies or other credible and legally established organizations. The objective of support must be clearly stated.

- 3) The Company does not make payments to government agencies or other organizations in the name of an individual; it must be in the name of the legal entity only.
- 4) Payment must have a valid receipt or Thank You Letter from that agency.
- 5) All employees must refuse to agree to a claim for a gift or something in return or any other benefits from government officials to complete the Company's operation promptly.

Understanding communication and giving Advice

Company personnel must acknowledge and comply with anti-corruption policies and guidelines. The Company realizes the importance of communication both within and outside the organization, including all stakeholders in order to gain knowledge and understanding in this matter.

Practice:

- 1) **The Office of Secretariat** is responsible for disseminating anti-corruption policies to directors, executives, shareholders, customers, business partners, and all groups of stakeholders. and related persons through the 56-1 One Report form, website www.tvothai.com or other methods as appropriate to ensure that the Company operates with transparency can check
- 2) Executives at all levels must take responsibility and consider it essential to encourage employees under their command to have knowledge and understanding and strictly follow the Anti-Corruption Policy.
- 3) Every employee must communicate to all stakeholders. as well as other people involved in business operations acknowledge and comply with the Anti-Corruption Policy.
- 4) If Company personnel have doubts about making decisions or performing tasks both set forth and not specified in the anti-corruption policy and practice guidelines, ask questions or suggestions at the Office of Secretariat.
- 5) Human Resources Department is responsible for providing knowledge by creating processes, so that the Company's personnel have knowledge and a correct understanding of anti-corruption measures and to be sufficient for the operation through various channels such as

5.1 Orientation for all new employees about Anti-Corruption Policy.

5.2 Disseminating knowledge about anti-corruption in the Company through training or seminars and public relations through electronic communication channels (Intranet System).

5.3 Organize anti-corruption activities regularly to know the risk of being involved in corruption and be aware of anti-corruption, including how to report clues and implement them.

Procurement

The Company's procurement of products and services must be transparent, fair, reasonable, and treat business partners equally. In order to achieve the most profitable operation for the Company, procurement must follow "Rules on Procurement" and "Rules on Approval and Operational Authority".

Practice:

The Company has no claim policy or gets an offer and any benefits from entrepreneurs to receive products, not under the agreement. The procurement must follow “Rules on Procurement” and “Rules on Approval and Operational Authority” (the Company reserves the right to cancel procurement if found to violate the Anti-Corruption Policy of the Company). Procurement operations must consider that the purpose of the use is essential. It will create value for money spent and maximum benefit.

Complaints and Whistleblowing

The Company has established a “complaint protocol” as a channel and process for complaints and whistleblowing as inappropriate behavior or contrary to ethical standards. These actions violate or fail to comply with the law, including actions contrary to Code of Conduct, company regulations, Corporate Governance Policy and Anti-Corruption Policy.

The Company pledges to listen to complaints and information from whistleblowers equitably, with transparency and fairness to all parties. The names of complainants and whistleblowers will be kept confidential. Complainants will be protected.

Scope of Complaints and Whistleblowing

- Behavior that is inappropriate or contrary to ethical standards, actions that violate or fail to comply with the law, including actions that are contrary to Code of Conduct, company regulations, Corporate Governance Policy and Anti-Corruption Policy.

- Corruption means an act to seek unlawful benefits for oneself or others, such as bribery or corruption, embezzlement, fraud, etc.

Channels for reporting complaints and whistleblowing

Company employees or outsiders if they see or know the clues inappropriate behavior Violation or non-compliance with the law, Code of Conduct, any company regulations including actions that may imply corruption Complaints and whistleblowers can be reported directly through the following channels:

1) Notify the Audit and Risk Management Committee

Attention: Chairman of the Audit and Risk Management Committee

Postal: Thai Vegetable Oil Public Company Limited

149 Ratchadapisek (Thapra-Taksin) Bukkhalow Thonburi Bangkok 10600

Email: acchairman.tv@gmail.com

2) Notify Office of the Internal Audit

Postal: Office of the Internal Audit

Thai Vegetable Oil Public Company Limited

149 Ratchadapisek (Thapra-Taksin) Bukkhalow Thonburi Bangkok 10600

Tel: 02-477-9020

Email: ac@tvotai.com

3) Notify via website

The Company opened a channel for whistleblowing and receiving complaints through the Company's website.

<https://www.tvotai.com/th/corporate-governance>

In this regard, the Company encourages whistleblowers to disclose their identity by specifying their names - surnames Contact details, providing truthful evidence clear enough, and using the complaint or whistleblowing form.

Practice:

The Company has set up detailed procedures for receiving complaints and whistleblowing information in the complaints protocol, and disclosed on the Company's website Corporate Governance Section other document titles or <https://www.tvotai.com/th/corporate-governance>

Protection measures for complainants and whistleblowers or rejecting corruption

Complainants, whistleblowers or those who cooperate in the investigation, and those who reject corruption will be protected according to the following criteria:

- 1) Complainants, whistleblowers, or those who cooperate in investigating facts will receive appropriate and fair protection. The Company will not disclose first name, last name, address, picture, or any other information that can identify the informant.
- 2) Complaint recipients and related persons aware of the matter or information related to the complaint must keep the information confidential. It will disclose as necessary, taking into account the safety and damage of the complainants, whistleblowers, or those who cooperate in the investigation without request. If it finds the information will be impacted to damage or insecurity, information on wrongdoing, record words, documentary evidence related, it will be kept secret. Do not forward it to another person unless it is a disclosure required by law.
- 3) Complainants, whistleblowers, and those who cooperate in the audit reject corruption or bribery will be protected. They will not be harassed, intimidated, punished, or acted in any other manner that is unfair treatment or has any negative consequences that affect the work function, even if doing so will cause the Company to lose business opportunities.
- 4) An appropriate and fair process will alleviate those who have suffered damage.

The Company imposes penalties, and ways to prevent recidivism in the complaints regulations and disclosed on the Company's website Corporate Governance Section other document titles or <https://www.tvothai.com/th/corporate-governance>

Related documents

- 1) Code of Conduct
- 2) Corporate Governance Policy
- 3) Regulations on Approval and Operational Authority
- 4) Procurement regulations
- 5) Complaint protocol
- 6) Regulations for company personnel
- 7) Practice for giving and receiving gifts, souvenirs, and entertainment.

Part 4 Complaint and Whistleblowing Form

Name-Surname of the Complainants *	
Department	
E-mail *	
Tel *	
Date of Event or Information Taken	
Incident Place:	
Related Department	
Related person:	1. 2. 3. 4.
Event details*	

Remark:

1. The Company encourages the whistleblowers to reveal their identity and provide truthful evidence.
2. The Company keeps the complainant's information and the whistleblowers confidential and protected as stipulated in the complaints protocol.
3. Those who give false whistleblowers or intentionally damage others' reputations and credibility will be subject to disciplinary action and legal action.

Acknowledgment and Compliance Certificate

I acknowledge, understand, and received the Anti-Corruption Policy and Anti-Corruption Manual of Thai Vegetable Oil Public Company Limited.

I understand, acknowledge, and treat this as a guideline for further operations.

Signature_____

(_____)

Employee Code : _____

Position : _____

Department : _____

Date : ____/____/____

Remarks:

- Signed the signature for acknowledgment and implementation. Please return to the Office of the Chief Executive Officer. or the Human Resources and Administration Department.
- The Anti-Corruption Manual can download from the Company's Intranet system.