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## **Yihai Kerry Arawana Holdings Co., Ltd.**

### **Anti-corruption Policy**

Yihai Kerry Arawana Holdings Co., Ltd. (hereinafter referred to as the “Company”) commits to engaging in anti-corruption in accordance with relevant national laws, regulations and rules. To safeguard a culture of integrity and to prevent and control corruption risks, the Company hereby formulates this Policy in light of the actual situation and in accordance with applicable laws and regulations, the Articles of Association and other relevant documents.

#### **1. Scope of Application**

This Policy is a public statement applicable to all employees of the Company and its subsidiaries, as well as to all external parties that have business relationships with the Company, including customers, suppliers, contractors and other stakeholders (hereinafter referred to as “Partners”).

#### **2. Definition**

Corruption refers to actions that violate national laws and regulations or the Company’s policies or deviate from the Company's values. It involves actions that harm the company's interests by various means for personal gain, including but not limited to bribery, misuse of position, conflicts of interest, malpractice for favoritism, money laundering/insider trading, and embezzling or misappropriating the Company's property.

#### **3. Anti-corruption Regulations for Employees of the Company**

The Company has zero tolerance for all kinds of corruption. Apart from potential criminal and civil liabilities involving imprisonment and/or a hefty fine, employees who are found to be in violation of this Policy shall be subject to appropriate disciplinary action, which may extend to immediate termination of employment or appointment, the clawback of past bonuses and the cancellation of their stock options. Disciplinary action will also be taken against employees who have knowledge of such violations but conceal such information from the Company, or who take detrimental action against others who report such violations.

Employees of the Company shall be honest and self-disciplined, and shall not take advantage

of their position to give, ask for, implicitly ask for, or accept bribes or obtain other property or non-property benefits, including but not limited to the following:

### **3.1 Gifts and Hospitality**

Employees should not accept entertainment, commission, emolument, service, gratuity, money, property or any pecuniary benefit or gift for their own personal benefit or advantage from any person/agent or representative having a direct or indirect business dealing with the Company.

Some disallowed actions include but are not limited to:

- i. Discussing, offering, or receiving any gifts or hospitality involving public officials, immediate family or relatives without prior approval from Head of Department.
- ii. Offering or accepting any gifts that are in cash or a cash equivalent, such as lottery tickets, gift certificates, vouchers, loans, guarantees, or any other granting of credit, shares, or options.
- iii. Offering or accepting any hospitality involving overnight stays or travel without prior approval from Head of Department.

All gifts, favors, contributions and entertainment offered to others or accepted by employees of the Company will be in accordance with widely accepted good business practices. Such gifts and hospitality shall never be offered or accepted as a kickback, bribe, or payoff, nor shall they be requested or in any way solicited by the Company or the employees.

### **3.2 Misuse of Position**

Employees should not use their position or the Company's name for personal advantage.

### **3.3 Contributions and Sponsorships**

The Company may offer scholarships, grants, charitable contributions or sponsorships for the betterment of society. This includes supporting advancement of research or for other socially beneficial purposes.

This must never be made to procure an improper advantage to the Company, nor be made conditional upon an individual or organization's agreement to recommend or promote the Company's products. The Company will only make charitable contributions that are legal and ethical under prevailing local laws and practices.

Appropriate review and approval procedures shall be applied for selection of recipients, including an evaluation of proposed recipient's reputation, track record, suitability for intended

purpose, and social benefits of the contribution. All material scholarships, grants, charitable contributions and non-commercial sponsorships must be approved by Management.

### **3.4 Government-Business Engagement**

As a responsible corporate, the Company takes a position on issues of public policy that could impact business through legally compliant channels. The Company may engage in efforts that may have an impact on legislation or government policy. All such engagement efforts will be conducted through officially recognized avenues, such as industry associations, government-business communication platforms, and public comment periods for policy drafts. These activities must ensure procedural transparency and strict legal compliance.

Refer to the internal management system of the Company - Code of Conduct for Employees for specific requirements.

### **4. Anti-corruption Regulations for Partners**

Partners are not allowed to offer commercial bribes to the employees of the Company in any name or in any form, such as providing money, presenting gifts, high-consumption dining and entertainment activities and other activities that provide personal interests or benefits. Refer to the Anti-Commercial Bribery Agreement and the internal management system of the Company - Code of Conduct for Employees for specific requirements.

### **5. Anti-corruption Training**

The Company conducts training on this Policy and related systems through employee training, supplier training and other trainings, so that employees and Partners can know this Policy and related systems.

### **6. Inspection of the Implementation of This Policy**

The Audit Department of the Company focuses on and inspects non-conformance with this Policy in the annual audits and/or special audits of the Company and its subsidiaries in the places of operation. The inspection results shall be reported to the Company's executive body and relevant committees of the Board of Directors in a timely manner.

### **7. Rewards and Punishments**

The Company shall hold employees accountable for proven corruption, and give corresponding punishment according to relevant provisions, or transfer to judicial authority for

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holding legally accountable in serious cases. Refer to the internal management system of the Company - Code of Conduct for Employees and Employee Reward and Punishment System - for specific requirements..

The Company will initiate corresponding punishment measures under the Anti-Commercial Bribery Agreement for Partners violating the Anti-Commercial Bribery Agreement or this Policy. Those suspected of any crime shall be transferred to the judicial authority for holding criminally liable.

#### **8. Complaints and Whistleblowing**

Any employee or Partner of the Company who discovers (or has reasonable grounds to suspect) any improper or illegal behavior in the scope of work shall raise the concern to the Company as soon as possible, or directly complain to the Chairman of the Company (kkh@wilmar.com.sg). Whistleblowers will be protected, for details, referring to the Whistleblowing Policy.

#### **9. Policy Revision**

The Company regularly revises and renews this Policy in accordance with laws and regulations, its own business development, common industry practices and good standards.

Yihai Kerry Arawana Holdings Co., Ltd.

May 28, 2026