
Yihai Kerry Arawana Holdings Co., Ltd.

Code of Business Ethics

As one of the important agricultural products and food processing enterprises in China, Yihai Kerry Arawana Holdings Co., Ltd. (hereinafter referred to as the “Company”) commits to upholding the highest standards of business ethics. The Company abides by relevant laws and regulations in all industries it operates in, and highlights the impact of business ethics on the Company itself, its shareholders, customers, employees, partners and other stakeholders. The Code aims to promote the sustainable and healthy development of the Company.

1. Scope of Application

This Policy is a disclosure 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. Audit

The Internal Audit Department of the Company focuses on and inspects non-conformance with this Policy/Code 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.

3. Responsibilities

3.1 Employees

Maintaining the Company's corporate culture and enhancing the Company's reputation is inseparable from the support of every employee of the Company and the implementation of this Code. Every employee must abide by the laws and regulations of the country, and is responsible for not harming or tarnishing the good image and reputation of the Company at any time.

Employees who believe that there is a violation of this Code, or that an activity or behavior may lead to a violation of this Code, are responsible for stopping the behavior or reporting the issue.

3.2 Officers

The officers of the Company shall play a key role in complying with this Code. We require the officers of the Company to set an example, uphold ethical behavior when performing their duties, be fair and honest at all times, never abuse the power granted by the Company, and all decisions should be made based on the long-term interests of the Company. In addition, officers shall help employees understand this Code and urge employees to comply with this Code in their daily work, and encourage employees to bring up misconduct discovered in their work in a responsible manner.

4. Code of Conduct

The Company requires all employees to comply with all laws, regulations and rules applicable to the Company.

4.1 Anti-unfair Competition

The Company believes that fair, impartial and open competition brings the greatest benefit to customers, partners and society. The Company observes relevant laws and regulations and is committed to fair and honest competition. The Company requires all employees to treat customers, suppliers and other employees with respect and fairness. The Company advocates to win competitive advantage with excellent quality and service, and rejects unethical and illegal business practices. No person may distort facts through manipulation, concealment or abuse of privileged information, or engage in any other illegal business practices to gain an unfair competitive advantage.

The Company requires all partners who have business relations with the Company to abide by relevant laws and regulations and not to adopt anti-competitive, fraudulent, discriminatory, dishonest, illegal or immoral business means. For requirements on suppliers, refer to relevant content in the Supplier Code of Conduct of the Company.

4.2 Anti-corruption

The Company has always been concerning about the work on anti-corruption, and has constantly advocated and enhanced it in daily operation management and training activities. All employees must comply with applicable laws and regulations and company policies, and no corruption behavior is allowed. Refer to relevant content in Anti-corruption Policy of the

Company for details.

4.3 Protection and Use of Company Property

All employees of the Company shall reasonably use and protect the Company's assets, including transportation vehicles and electronic equipment for personal use due to work needs. Theft, carelessness and waste of the assets will cause unnecessary losses to the Company. Use of Company funds or assets for any illegal or improper purpose (whether for personal gain or not) is strictly prohibited.

4.4 Human Rights Protection

The Company fully understands that employees are the foundation of the Group. The Company fully respects and cares about protecting the legitimate rights and interests of all employees, and is committed to providing a healthy, safe and environmental-friendly workplace for employees, and prohibits any harassment. The Company ensures the elimination of inequality caused by gender, region and age in employee recruitment, salary and welfare, training and development, career promotion and other aspects, prevents discrimination, and resists the use of child labor and forced labor. Refer to relevant content in Human Rights Policy of the Company for details.

4.5 Protection of Intellectual Property Rights and Trade Secrets

Intellectual property rights protection is the foundation of mutual trust among the Company, its customers, suppliers and other third parties. The Company highlights the protection and management of intellectual property rights.

4.6 Financial Reports and Information Disclosure

As a listed company, the Company's financial policies shall be consistent with all applicable accounting standards and relevant regulations. The Company requires that all information be recorded truthfully, accurately and in a timely manner and be disclosed in accordance with relevant laws and regulations.

Employees of the Company shall not make any oral, written or any other statement regarding Company policies or decisions, nor shall they disseminate any such statement without authorization.

4.7 Anti-money Laundering and Anti-insider Trading

The Company strictly complies with the requirements of relevant laws and regulations, and strictly prohibits any form of money laundering and insider trading.

5. 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 Whistleblower Protection Policy.

6. Policy Review

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

Kuok Khoon Hong
Chairman, Sustainability Committee
Yihai Kerry Arawana Holdings Co., Ltd.

December 1, 2021