
TAX REPORTING





Charoen Pokphand Foods Public Company Limited and Subsidiaries

Tax Performance

Recognizing that “tax” is critical to sustainable development. It not only promotes and supports competitiveness of the business but also helps create positive socio-economic impacts as well as national development as a whole. The Company is committed to tax management as in our [Tax Policy](#) based on the principles of accuracy, transparency, and accountability in compliance with the Thailand Revenue Code and foreign tax laws for the highest benefits of the Company and all stakeholders.

In 2021 and 2022, the Company’s Revenue was THB 512,704 million and 614,197 million respectively, Operating profit (EBT) was 16,732 million and 20,427 million respectively. Income tax paid for 2021 and 2022 total to THB 6,429 million and 6,688 million, respectively.

Reconciliation of Effective Tax Rate

	(THB million)	
	2021	2022
Accounting profit (loss) before income tax, EBT	16,732	20,427
Tax at the applicable tax rates (1)	3,446	5,377
<i>% of EBT-Net</i>	20.59%	26.32%
Tax effect of income and expenses that are not taxable income or not deductible in determining taxable profit, net (2)	3,258	1,271
Current tax	6,704	6,648
Current tax - Under (Over) provided in prior years	(275)	40
<u>Current tax year</u>	<u>6,429</u>	<u>6,688</u>
<i>% of EBT-Net</i>	38.42%	32.74%
Deferred tax		
- Movements in temporary differences (3)	(545)	(454)
- Benefit of tax losses recognised (4)	(3,230)	(231)
Income tax expense (income)	2,654	6,003
<i>% of EBT-Net</i>	15.86%	29.39%
<u>Cash tax paid</u>	<u>8,282</u>	<u>6,120</u>
<i>% of EBT</i>	49.50%	29.96%

Explanation:**(1) Income Tax Rate**

The income tax rate used in the notes to financial statement no.27 is lower than the average income tax rate of each country in which the Company has invseted. This is due to a portion of the income being excmpted from income taxes. For example, in Thailand, the Company has been granted privileges of investment promotion per the Investment Promotion Act BE 2520 (AD 1977) in various types of businesses. This comprises animal feed production business, animal husbandry business, animal breeding business, food processing and read-to-eat meal production business. By doing so, the Company is exempted from corporate income tax for the net profit received accordng the period and conditions specified in each investment promotional certificates. The Company receives 50% reduction in corporate income tax for the net profit derived from the promoted business for a period of 5 years after the expiration of tax exemption period.

Furthremore, the share of profits from investment in associates and joint ventures which the Company has recognized as income under the equity method and included in the profit (loss) before tax expenses in the conslidated financial statement is also considered as income.

(2) Tax effect of income and expenses that are not considered as income or tax expenses such as

- Gain from investment swap with shares. In 2021, one of CPF's associate companies underwent an entire business transfer ("EBT") to another associated company through allocation of new ordinary shares as compensation. As a result, the respective company made gains from the investment swap with shares. In the consolidated income statement, such EBT gains are not subject to taxation.
- Entertainment and donation expenses in excess of the amount allowed to be deducted by the tax law
- Certain types of expenses which can be deducted as tax expenses more than one hundred percent, such as training expense, research & development expense and donation expense
- Profit (loss) from the exchange rate used in the calculation of income tax but not included in accounting profit (loss)

- Dividend income of the listed companies on the stock exchange obtained from limited companies established under Thai laws

(3) Changes in temporary differences such as

- Gain (loss) from changes in the fair value of biological assets
- Differences in the calculation of depreciation and amortization of accounting and tax methods

(4) Tax loss

In 2021 and 2022, some companies report losses, which was acknowledged for tax income revenue and recorded income tax asset. Especially in 2021, the Company has considered that some companies have sustained losses in the previous 2-3 years, with unrecognized tax income revenue. In the near future, the Company will generate profits exceeding those losses, which will result in tax income payments in the future. Therefore, the company has recorded tax income revenue from the previous year's loss as well.

Number of entities, Number of employees and Revenue by country (As at 31 December 2022)

Country	Number of all the resident entities	Number of employees	Revenue Year 2022	
Thailand	18	70,464	224,356	36.5%
Vietnam	5	31,132	124,634	20.3%
China (Including Hong Kong and Taiwan)	48	11,483	76,978	12.5%
United States	9	1,866	31,494	5.1%
Russia	32	7,041	29,621	4.8%
United Kingdom	59	385	20,975	3.4%
India	2	3,139	20,688	3.4%
Philippines	1	2,358	20,612	3.4%
Others	58	9,033	64,839	10.6%
Total	232	136,901	614,197	100%

Explanation:

- Revenue : Sales income presented in the income statement
- Others : Comprise of India, Cambodia, Turkey, Germany, Laos, Poland, Belgium, Sri Lanka, Denmark, Singapore, etc.

Name of all resident Entities and Primary activities

<u>Country</u>	<u>Subsidiaries</u>	<u>Primary Activities</u>
Thailand	1 Charoen Pokphand Foods Plc.	Agro-industrial and integrated food and Investment
	2 CPF (Thailand) Plc.	Agro-industrial and integrated food
	3 CPF Food and Beverage Co., Ltd.	Production and sale of ready meals
	4 CPF Trading Co., Ltd.	Wholesale and retail food products
	5 Bangkok Produce Merchandising Plc.	Animal feed raw materials distribution
	6 CPF Food Research and Development Center Co., Ltd.	Food research and development
	7 International Pet Food Co., Ltd.	Production and sale of pet food
	8 CPF IT Center Co., Ltd.	Information technology service provider
	9 CPF Restaurant and Food Chain Co., Ltd.	Five stars business and restaurants
	10 CP Hilai Harbour Co., Ltd.	Restaurant
	11 Dak Glabi Group Co., Ltd.	Restaurant
	12 Chester's Food Co., Ltd.	Restaurant
	13 C.P. Merchandising Co., Ltd.	Investment and international trading
	14 Westbridge Foods (Thailand) Ltd.	Provision and development for Asian food product
	15 CPF Training Center Co., Ltd.	Training center service provider
	16 Suansomboon Co., Ltd.	Agricultural plant farming
	17 Tacharm Agricultural Industry Co., Ltd.	Livestock farming
	18 CPF Food Network Co., Ltd.	Exporter and importer of processed food and ready meals
Vietnam	19 C.P. Vietnam Corporation	Production and sale of animal feed, farming and food processing plant
	20 CPV Food Co., Ltd.	Livestock farming, production and sale of animal feed and processed food
	21 Dzine Food Solutions Co., Ltd.	Restaurants and mobile catering services
	22 AHM Lifestyles - Creative Hospitality Joint Stock Co., Ltd.	Restaurant
	23 Advanced Aquaculture Viet Nam Co., Ltd.	Aquaculture farming
China (Include Republic Of China and Hong Kong)	24 C.P. Aquaculture (Dongfang) Co., Ltd.	Shrimp hatchery business
	25 C.P. Aquaculture (Zhanjiang) Co., Ltd.	Shrimp hatchery business
	26 CPF Food Trading Co., Ltd.	Importer and distributor of processed meat and ready meals
	27 Wesbridge (Qingdao) Trading Co., Ltd.	Provision and development for Asian food product
	28 Zhangzhou C.P. Chia Tai Aquaculture Co., Ltd.	Shrimp farming
	29 Beijing CP Consultation Services Co., Ltd.	Provision of consulting service on economic and trade
	30 C.P. Food (Hengshui) Co., Ltd.	Production and sale of processed food
	31 C.P. Food (Kaifeng) Co., Ltd.	Production and sale of processed food

<u>Country</u>	<u>Subsidiaries</u>	<u>Primary Activities</u>
32	C.P. Food (Nantong) Co., Ltd.	Food processing plant, production and distribution of processed meat and ready meal
33	C.P. Food (Zhanjiang) Co., Ltd.	Production and sale of processed food
34	C.P. Food Enterprise (Ningbo) Co., Ltd.	Food processing plant, production and distribution of processed meat and ready meal
35	Chia Tai (Beijing) Investment Management Co., Ltd.	Rendering management and advisory service
36	Chia Tai Food Enterprise (Qingdao) Co., Ltd.	Food processing plant, production and distribution of processed meat and ready meal
37	CP Food Enterprise (Qinhuangdao) Co., Ltd.	Food processing plant, production and distribution of processed meat and ready meal
38	Chia Tai Biopharmaceutical (Fujian) Co., Ltd.	Production and sale of drugs
39	Chia Tai Food (Suqian) Co., Ltd.	Poultry farming, production and sale of chicken meat products
40	Henan Chia Tai Agro-Industrial Financing Guarantee Co., Ltd.	Providing financial guarantee services
41	Hubei Chia Tai Co., Ltd.	Production and sale of animal feed and breeding and processed food
42	Jiangsu Chia Tai Agriculture Financing Guarantee Co., Ltd.	Providing financial guarantee services
43	Jilin Chia Tai Food Co., Ltd.	Food processing plant, production and distribution of processed meat and ready meal
44	Fujian Chia Tai Food Co., Ltd.	Sale of processed poultry meat
45	Fujian Hetai Agro-Industry Co., Ltd.	Farming and trading of poultry
46	Longyan Baotai Agro-Industry Co., Ltd.	Farming and sale of poultry
47	Longyan Chia Tai Co., Ltd.	Production of processed poultry meat
48	Henan Chia Tai Biochemistry Trading Co., Ltd.	Production and sale of veterinarian
49	Pucheng Chia Tai Biochemistry Ltd.	Production and sale of chlortetracycline
50	Zhumadian Huazhong Chia Tai Co., Ltd.	Production and sale of chlortetracycline
51	Dongying Chia Tai Aqua Co., Ltd.	Production and sale of animal feed
52	C.P. Aquaculture (Jiangsu) Co., Ltd.	Production and sale of animal feed
53	Chia Tai Food Industry (Suqian) Co., Ltd.	Production and sale of processed food, processed meat and ready meals
54	CPF Hong Kong Co., Ltd.	Importer and distributor of eggs, fresh meat, processed meat, seafood, milk product and RTE products, frozen fruit, and investment
55	C.P. Standard Resources Ltd.	Investment
56	CP Food Investment Ltd.	Investment
57	Hannick Ltd.	Property investment
58	C.P. Enterprises Ltd.	Investment
59	Chia Tai Huazhong Biochemistry Ltd.	Investment
60	Chia Tai Pucheng Biochemistry Ltd.	Investment
61	Golden Industrial Investment Ltd.	Investment
62	Chia Tai Lianyungang Co., Ltd.	Investment

<u>Country</u>	<u>Subsidiaries</u>	<u>Primary Activities</u>
USA	63 CP Aqua Co., Ltd.	Investment in aquaculture business
	64 Chun Ta Investment Co., Ltd.	Investment
	65 Ta Chung Investment Co., Ltd.	Investment
	66 Charoen Pokphand Enterprise (Taiwan) Co., Ltd.	Chicken integration and livestock farming
	67 Charoen Pokphand (Taiwan) Co., Ltd.	Importer and distributor of feedstuff additives and animal vaccines
	68 Rui Mu Foods Co., Ltd.	Layer chicken business
	69 Rui Fu Foods Co., Ltd.	Layer chicken business
	70 Sheng Da Food Co., Ltd.	Layer chicken business
	71 Arbor Acres (Taiwan) Co., Ltd.	Livestock farming
	72 Bellisio Foods, Inc.	Production and distributor of ready meals
	73 Bellisio Investment, LLC	Investment
	74 C.P. Food Products, Inc.	Importer and distributor of seafood products
	75 Frozen Specialties, Inc.	Production and distributor of ready meals
	76 FSI Parent Corp.	Investment
	77 Homegrown Shrimp (USA), LLC.	Shrimp farming
	78 Overhill Farms, Inc.	Production and distributor of ready meals
	79 Berice LLC.	Investment in restaurant
	80 Yipeng, LLC.	Restaurant
Russia	81 Agro-Oskol CJSC	Agricultural plant farming
	82 Agro-Ostrogorszhsk LLC.	Agricultural plant farming
	83 Agro-Sojuz TS LLC.	Investment
	84 Alekseevskiy Kombikormovy Zavod CJSC	Animal feedmill
	85 Alekseevsky Bekon JSC	Livestock farming
	86 APK Don LLC.	Management and advisory service
	87 Chochol Trostjanka LLC.	Agricultural plant farming
	88 Donskoy Bekon LLC.	Livestock farming
	89 Farm Construction LLC.	Swine farm construction
	90 Kornevo LLC.	Livestock farming
	91 Management Company RBPI Group LLC.	Property lease-out
	92 Mjaso-Sojuz T LLC.	Investment
	93 MPK Belgorod LLC.	Investment
	94 NNPP LLC.	Livestock farming
	95 NNPP-2 LLC.	Livestock farming
	96 Pravdinsk Pig Production JSC	Livestock farming
	97 Pravdinsk Pig Production-2 LLC.	Livestock farming
	98 RBPI ELITE SEEDS LLC.	Production of elite seeds
	99 RBPI Partner East LLC.	Slaughterhouse
	100 RBPI Partner West LLC.	Slaughterhouse
	101 RBPI Voronezh LLC.	Investment
	102 Rechnoe LLC.	Biological waste management services provider

<u>Country</u>	<u>Subsidiaries</u>	<u>Primary Activities</u>
United Kingdom	103 Charoen Pokphand Foods (Overseas) LLC.	Animal feedmill and livestock farming
	104 CPF Agro LLC.	Livestock farming
	105 CPF Construction LLC.	Provision of consulting service on construction
	106 CPF Foods LLC.	Property lease-out
	107 CPF Ryazan LLC.	Livestock farming
	108 CPF Serebryanie Prudy LLC.	Livestock farming
	109 JSC Poultry Production Severnaya	Animal feedmill, livestock farming and food processing plant
	110 JSC Poultly Parant Stock Production Woyskovitsy	Livestock farming and breeding
	111 Stesha LLC.	Investment
	112 CP Foods Trading Co., LLC.	Importer and exporter of meat products
	113 Food Trac Ltd.	Distribution of meat products
	114 Wesbridge Food Group Limited	Investment
	115 Wesbridge Foods Ltd.	Importer and distributor of meat and processed foods
	116 CP Foods (UK) Ltd. ("CPF UK")	Importer and distributor of processed meat and ready meals
	117 Fusion Abbey Park Ltd.	Importer and distributor of processed meat and ready meals
	118 Fusion Alfrick Ltd.	Importer and distributor of processed meat and ready meals
	119 Fusion Bracewell Ltd.	Importer and distributor of processed meat and ready meals
	120 Fusion Bransford Ltd.	Importer and distributor of processed meat and ready meals
	121 Fusion Broadway Ltd.	Importer and distributor of processed meat and ready meals
	122 Fusion Brothwood Ltd.	Importer and distributor of processed meat and ready meals
	123 Fusion Calis Ltd.	Importer and distributor of processed meat and ready meals
	124 Fusion Carnoustie Ltd.	Importer and distributor of processed meat and ready meals
	125 Fusion Charlton Ltd.	Importer and distributor of processed meat and ready meals
	126 Fusion Crowle Ltd.	Importer and distributor of processed meat and ready meals
	127 Fusion Dalaman Ltd.	Importer and distributor of processed meat and ready meals
	128 Fusion Defford Ltd.	Importer and distributor of processed meat and ready meals
	129 Fusion Dormington Ltd.	Importer and distributor of processed meat and ready meals

<u>Country</u>	<u>Subsidiaries</u>	<u>Primary Activities</u>
	130 Fusion Driscoll Ltd.	Importer and distributor of processed meat and ready meals
	131 Fusion Dumbleton Ltd.	Importer and distributor of processed meat and ready meals
	132 Fusion Eastoe Ltd.	Importer and distributor of processed meat and ready meals
	133 Fusion Elmbridge Ltd.	Importer and distributor of processed meat and ready meals
	134 Fusion Everton Ltd.	Importer and distributor of processed meat and ready meals
	135 Fusion Exning Ltd.	Importer and distributor of processed meat and ready meals
	136 Fusion Fethiye Ltd.	Importer and distributor of processed meat and ready meals
	137 Fusion Gatley Ltd.	Importer and distributor of processed meat and ready meals
	138 Fusion Gocek Ltd.	Importer and distributor of processed meat and ready meals
	139 Fusion Gray Ltd.	Importer and distributor of processed meat and ready meals
	140 Fusion Harper Ltd.	Importer and distributor of processed meat and ready meals
	141 Fusion Hawstead Ltd.	Importer and distributor of processed meat and ready meals
	142 Fusion Heartford Ltd.	Importer and distributor of processed meat and ready meals
	143 Fusion Heath Ltd.	Importer and distributor of processed meat and ready meals
	144 Fusion Head Street Ltd.	Importer and distributor of processed meat and ready meals
	145 Fusion Irvine Ltd.	Importer and distributor of processed meat and ready meals
	146 Fusion Kaitaia Ltd.	Importer and distributor of processed meat and ready meals
	147 Fusion Kroma Ltd.	Importer and distributor of processed meat and ready meals
	148 Fusion Krone Ltd.	Importer and distributor of processed meat and ready meals
	149 Fusion Littleworth Ltd.	Importer and distributor of processed meat and ready meals
	150 Fusion Madeley Ltd.	Importer and distributor of processed meat and ready meals

<u>Country</u>	<u>Subsidiaries</u>	<u>Primary Activities</u>
India	151 Fusion Newlands Ltd.	Importer and distributor of processed meat and ready meals
	152 Fusion Niamh Ltd.	Importer and distributor of processed meat and ready meals
	153 Fusion Pershore Ltd.	Importer and distributor of processed meat and ready meals
	154 Fusion Priest Lane Ltd.	Importer and distributor of processed meat and ready meals
	155 Fusion Samui Ltd.	Importer and distributor of processed meat and ready meals
	156 Fusion Soham Ltd.	Importer and distributor of processed meat and ready meals
	157 Fusion Southall Ltd.	Importer and distributor of processed meat and ready meals
	158 Fusion Stevens Ltd.	Importer and distributor of processed meat and ready meals
	159 Fusion Thetford Ltd.	Importer and distributor of processed meat and ready meals
	160 Fusion Turgay Ltd.	Importer and distributor of processed meat and ready meals
	161 Fusion Uzumlu Ltd.	Importer and distributor of processed meat and ready meals
	162 Fusion Van Den Hauwe Ltd.	Importer and distributor of processed meat and ready meals
	163 Fusion Wadborough Ltd.	Importer and distributor of processed meat and ready meals
	164 Fusion Wellington Ltd.	Importer and distributor of processed meat and ready meals
	165 Fusion Whistler Ltd.	Importer and distributor of processed meat and ready meals
	166 Fusion Wright Ltd.	Importer and distributor of processed meat and ready meals
	167 Fusion Yamac Ltd.	Importer and distributor of processed meat and ready meals
	168 The Foodfellas Ltd.	Import food raw materials and food products
India	169 CP Chozen Ltd.	Investment
	170 Chozen Holdings Ltd.	Restaurant
Philippines	171 Chozen Noodle Trading Ltd.	Property lease-out
	172 CPF (INDIA) Private Ltd.	Production and sale of animal feed, farming and food processing plant
	173 C.P. Aquaculture (India) Private Ltd.	Aquatic feedmill and shrimp hatchery in India
	174 Charoen Pokphand Foods Philippines Corp.	Production and sale of animal feed, farming and shrimp hatchery business

<u>Country</u>	<u>Subsidiaries</u>	<u>Primary Activities</u>
Malaysia	175 AA Meat Shop Sdn. Bhd.	Livestock processing retailer
	176 Asia Aquaculture (M) Sdn. Bhd.	Shrimp farming and processing plant
	177 Charoen Pokphand Foods (Malaysia) Sdn. Bhd.	Investment in aquaculture integration business and swine business
	178 Chau Yang Farming Sdn. Bhd.	Livestock farming
	179 Makin Jernih Sdn. Bhd.	Investment
	180 Tip Top Meat Sdn. Bhd.	Livestock processing plant
	181 Star Feedmills (M) Sdn. Bhd.	Aquatic feed production and distribution
	182 Charoen Pokphand Holdings (Malaysia) Sdn. Bhd.	Investment in livestock feedmill and livestock farming companies in Malaysia
	183 Avian farm (Malaysia) Sdn. Bhd.	livestock feedmill and livestock farming
	184 Charoen Pokphand Jaya Farm (M) Sdn. Bhd.	livestock feedmill and livestock farming
Cambodia	185 PK Agro - Industrial Products (M) Sdn. Bhd.	livestock feedmill and livestock farming
	186 Teck Huat Farming Sdn. Bhd.	livestock feedmill and livestock farming
Turkey	187 C.P. Cambodia Co., Ltd.	Production, sale of animal feed, livestock farming and food processing plant
	188 Cambodia Property and Trading Co., Ltd.	Property lease-out
Germany	189 C.P. Standart Gida Sanayi ve Ticaret A.S.	Agro-industrial and integrated food
Laos	190 Paulsen Food GmbH	Distributor of processed meat and investment
	191 CPF Distribution GmbH	Distribution of ready meals
	192 ZGG Verwaltungs GmbH	Investment
Poland	193 C.P. Laos Co., Ltd.	Animal feedmill and livestock farming
Belgium	194 CPF Poland S.A	Agro-industrial and food
	195 PetRepublic Ltd.	Production and sale of pet food
	196 CPF Culinar Sp. z o.o.	Production of seafood products
	197 Food Port Sp. z o.o.	Distributor of seafood products
	198 PLANT-TEC Europe Sp. z o.o.	Investment
Sri-Lanka	199 CPF Europe S.A.	Importer and distributor of processed meat and ready meals
	200 Tops Foods NV	Production and distributor of ready meals
Denmark	201 Norfolk Foods (Private) Limited	Production and sale of ready meal
	202 Lotus Aquaculture Lanka (Private) Ltd.	Shrimp hatchery, farm and cold storage
Denmark	203 Finagro ASP	Financial service
	204 CPF Denmark A/S	Importer and distributor of processed meat and ready meals

<u>Country</u>		<u>Subsidiaries</u>	<u>Primary Activities</u>
Singapore	205	CP Foods Singapore Pte. Ltd.	Importer and distributor of processed meat and ready meals
Canada	206	Bellisio Foods Canada Corp.	Production and distributor of ready meals
	207	CPF Canada Holdings Corp.	Investment in integrated swine business
Japan	208	CPF Japan Co., Ltd.	Importer and distributor of processed meat and ready meals
France	209	Wesbridge Foods (France) Sarl	Distribution of meat products
Norway	210	Russia Baltic Pork Invest ASA	Investment
Netherlands	211	Wesbridge Holding B.V.	Investment
	212	CPF Netherlands B.V.	Investment
South Korea	213	Consumer Package Commerce Co., Ltd.	Importer and distributor of processed meat and ready meals
British Virgin Islands	214	Bright Excel Investments Ltd.	Investment
	215	C.P. Foods Holdings Ltd.	Investment
	216	C.P. Foods International Ltd.	Investment
	217	Coinaton Investments Ltd.	Investment
	218	CPF Investment Ltd.	Investment
	219	CPVN Ltd.	Investment
	220	Forward Pass Ltd.	Investment
	221	Giant Crown Invesments Limited	Investment
	222	New Splendid Holdings Ltd.	Investment
	223	Modern State Investments Ltd.	Investment
	224	Charoen Pokphand (China) Investment Ltd.	Investment
	225	ECI Machinery Co., Ltd.	Investment
	226	CP Foods Capital Ltd.'	Investment
Bermuda	227	Charoen Pokphand (Taiwan) Investment Ltd.	Investment
	228	C.P. Pokphand Co., Ltd.	Investment in agro-industrial and food business
	229	C.T. Progressive (H.K.) Ltd.	Investment
	230	Chia Tai Enterprises International Ltd.	Investment
Cayman Islands	231	CP China Investment Ltd.	Investment
	232	Plenty Type Ltd.	Investment
