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
% of EBT-Net	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
Current tax year	<u>6,429</u>	<u>6,688</u>
% of EBT-Net	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
% of EBT-Net	15.86%	29.39%
Cash tax paid	<u>8,282</u>	<u>6,120</u>
% of EBT	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 excempted 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 according the period and conditions specificed 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 Ye	ear 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

Country		Subsidiaries	Primary Activities
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.,	Food research and development
		Ltd.	
	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.	Restaurant
	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	Restaurant
		Co., Ltd.	
	23	Advanced Aquaculture Viet Nam Co., Ltd.	Aquaculture farming
China	24	C.P. Aquaculture (Dongfang) Co., Ltd.	Shrimp hatchery business
(Include Republic Of	25	C.P. Aquaculture (Zhanjiang) Co., Ltd.	Shrimp hatchery business
China and Hong	26	CPF Food Trading Co., Ltd.	Importer and distributor of processed meat and
Kong)			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

Country		Subsidiaries	Primary Activities
<u> </u>	32	C.P. Food (Nantong) Co., Ltd.	Food processing plant, production and
			distribution of processed meat and ready meal
3	33	C.P. Food (Zhanjiang) Co., Ltd.	Production and sale of processed food
3	34	C.P. Food Enterprise (Ningbo) Co., Ltd.	Food processing plant, production and
			distribution of processed meat and ready meal
3	35	Chia Tai (Beijing) Investment Management Co., Ltd.	Rendering management and advisory service
3	36	Chia Tai Food Enterprise (Qingdao) Co., Ltd.	Food processing plant, production and
			distribution of processed meat and ready meal
3	37	CP Food Enterprise (Qinhuangdao) Co., Ltd.	Food processing plant, production and
			distribution of processed meat and ready meal
3	38	Chia Tai Biopharmaceutical (Fujian) Co., Ltd	Production and sale of drugs
3	39	Chia Tai Food (Suqian) Co., Ltd.	Poultry farming, production and sale of chicken
			meat products
4	40	Henan Chia Tai Agro-Industrial Financing	Providing financial guarantee services
		Guarantee Co., Ltd.	
4	41	Hubei Chia Tai Co., Ltd.	Production and sale of animal feed and
			breeding and processed food
4	42	Jiangsu Chia Tai Agriculture Financing Guarantee Co., Ltd.	Providing financial guarantee services
4	43	Jilin Chia Tai Food Co., Ltd.	Food processing plant, production and
			distribution of processed meat and ready meal
4	44	Fujian Chia Tai Food Co., Ltd.	Sale of processed poultry meat
4	45	Fujian Hetai Agro-Industry Co., Ltd.	Farming and trading of poultry
4	46	Longyan Baotai Agro-Industry Co., Ltd.	Farming and sale of poultry
4	47	Longyan Chia Tai Co., Ltd.	Production of processed poultry meat
4	48	Henan Chia Tai Biochemistry Trading Co., Ltd.	Trading of animal drugs
4	49	Pucheng Chia Tai Biochemistry Ltd.	Production and sale of chlortetracycline
5	50	Zhumadian Huazhong Chia Tai Co., Ltd.	Production and sale of chlortetracycline
5	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
5	53	Chia Tai Food Industry (Suqian) Co., Ltd.	Production and sale of processed food,
			processed meat and ready meals
5	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
5	58	C.P. Enterprises Ltd.	Investment
5	59	Chia Tai Huazhong Biochemistry Ltd.	Investment
6	60	Chia Tai Pucheng Biochemistry Ltd.	Investment
6	61	Golden Industrial Investment Ltd.	Investment
6	62	Chia Tai Lianyungang Co., Ltd.	Investment

Country	<u>Subsidiaries</u>	Primary Activities
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
USA 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,
		RTE products and frozen fruit
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-Ostrogorzhsk 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

Country		<u>Subsidiaries</u>	Primary Activities
	102	Rechnoe LLC.	Biological waste management services provider
	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 Poulty Parant Stock Production Woyskovitsy	Livestock farming and breeding
	111	Stesha LLC.	Investment
	112	CP Foods Trading Co., LLC.	Importer and exporter of meat products
United Kingdom	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, product repacking service 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
	400	Fusion Bransford Ltd.	ready meals
	120	Fusion Bransford Ltd.	Importer and distributor of processed meat and
	121	Fusion Broadway Ltd.	ready meals Importer and distributor of processed meat and
	121	Table 1 Broadway Etc.	ready meals
	122	Fusion Brothwood Ltd.	Importer and distributor of processed meat and
		r dolon Browniese Zid.	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

<u>Country</u>	<u>Subsidiaries</u>	Primary Activities
129	Fusion Dormington Ltd.	Importer and distributor of processed meat and
		ready meals
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
4.44	Finite Harris ad I dd	ready meals
141	Fusion Hawstead Ltd.	Importer and distributor of processed meat and
142	Fusion Heartford Ltd.	ready meals
142	i usion ricattiora Eta.	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

<u>Country</u>		Subsidiaries	Primary Activities
	150	Fusion Madeley Ltd.	Importer and distributor of processed meat and
			ready meals
	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.	Importer, exporter, and distributor of food raw
			materials, food products and frozen fresh fruit
	169	CP Chozen Ltd.	Investment
	170	Chozen Holdings Ltd.	Restaurant
	171	Chozen Noodle Trading Ltd.	Property lease-out

<u>Country</u>		Subsidiaries	Primary Activities
India	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
Philippines	174	Charoen Pokphand Foods Philippines Corp.	Production and sale of animal feed, farming and shrimp hatchery business
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
	185	PK Agro - Industrial Products (M) Sdn. Bhd.	livestock feedmill and livestock farming
	186	Teck Huat Farming Sdn. Bhd.	livestock feedmill and livestock farming
Cambodia	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
Türkiye	189	C.P. Standart Gida Sanayi ve Ticaret A.S.	Agro-industrial and integrated food
Germany	190	Paulsen Food GmbH	Distributor of fresh meat, processed products, seafood and investment
	191	CPF Distribution GmbH	Distribution of ready meals
	192	ZGG Verwaltungs GmbH	Investment
Laos	193	C.P. Laos Co., Ltd.	Animal feedmill and livestock farming
Poland	194	CPF Poland S.A	Agro-industrial and food
	195	Pet Republic 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
Belgium	199	CPF Europe S.A.	Importer and distributor of fresh meat and processed food, including RTE products, dry food, ingredients, seafood, and investment
	200	Tops Foods NV	Production and distributor of ready meals

Country		Subsidiaries	Primary Activities
Sri-Lanka	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 fresh meat and
			processed food, including RTE products and
			frozen fruit
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	214	Bright Excel Investments Ltd.	Investment
Islands			
	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
