



Policy code No. M11

Revision No. 00

Effective Date: 1 January 2021

Anti-Corruption Policy and Whistle Blowing Policy

North East Rubber Public Company Limited (“The company”) places importance on compliance with good corporate governance principles, conduct business with transparency, honesty and good governance. As well as strictly complying with relevant laws and regulations and can be examined. Therefore, the Board of Directors has established the Anti-Corruption Policy and Whistle Blowing Policy to be used as follows:

Anti-Corruption Policy

The company has given importance to opposing any action that is related to fraud and corruption for direct or indirect benefits, whether as a receiver, giver or offeror bribe. Both in monetary or non-monetary to government agencies or private agencies that the Company conduct business or contact with. There are main principles as follows:

1. The company does not offer compensation, pay bribes, call for, agree or receive bribes from other people or other agencies either directly or indirectly. In order to have a return for mutual benefit or expect benefits related to the work of the company.
2. The company does not conduct illegal transactions which involves government officials other person or organization either directly or indirectly.
3. The company does not donate money or pay to facilitate or provide any support to other persons or entities as a means of paying bribes.
4. The company does not support money or any other benefits either directly or indirectly to political parties, any political group or person related to politics. In order to benefit in the operation of the business or for the benefit of oneself and others.

Whistle Blowing Policy

The Board of Directors has assigned the Audit Committee to consider and receive complaints from stakeholders. In order to protect and provide fairness to stakeholders who report information or provide clues about misconduct or corruption against the Company as follows:



1. Purpose

1.1 Encourage Directors, Sub-committees, Executives and all employees of the company as well as various stakeholders, complaints and clues about any misconduct and corruption can be made related to the company.

1.2 Establish a safe and confidential channel for complaints and whistle blowing of misconduct and fraud. To protect anyone from being able to confidently provide information about their concerns.

1.3 Provide protection to complainants or whistleblowers of corruption, including any cooperation or assistance to complainants or whistleblowers not to be harassed, intimidated, changed, job titles, job descriptions, workplaces, suspension, fire, ceasing of commercial transactions and perform any other acts that are unfair or detrimental to the whistleblowers. The name of the complainant or whistleblower and the information provided will be kept confidential.

2. Definition

2.1 “The company” means North East Rubber Public Company Limited.

2.2 “Employee” means all employees of the Company, every position, every type and every level of management including company Directors, Sub-Committee and Executives.

2.3 “Stakeholder” means in addition to employees and customers mentioned above, also refer to business partners, competitors, related organizations, communities, manufacturers, suppliers, sub-contractors, financial institutions, shareholders, accounts payable, accounts receivable and investors etc.

2.4 “Complainant or Whistleblower” means a person who discloses information of any wrongdoing or unethical conduct that oneself has seen.

2.5 “Audit team” means a working group appointed by the company, consisting of the working group's chairman and member in order to carry out the primary investigation.

2.6 “Complaint recipient” means Chairman of the Audit Committee.

3. Persons entitled to make complaints or notify clues

Stakeholders and others including Company's Directors, Sub-Committees, Executives, Employees who witness any acts that violate the law, rules, company's regulations, policies, announcements that are in accordance with good corporate governance principles. There is good governance in business operations of the company and fraud or corruption which may cause damage to the company. It reserves the right to consider the following issues:

3.1 Application

3.2 Surveys or obtaining information about the company

3.3 Asking for donations

3.4 Matters beyond the Company's power to proceed

3.5 Matters that are not beneficial to the overall operation of the company



4. Methods for making complaints and reporting clues

The company has established methods and channels for complaints and report clues which the complainant or whistleblower can proceed as follows:

4.1 Send a letter to the Chairman of the Audit Committee who are independent directors as follows:

Mr. Ronnachit Jinadit (Chairman of the Audit Committee)

North East Rubber Public Company Limited

398 Moo 4, Khok Ma Sub-district, Prakhon Chai District, Buriram Province 31140

E-Mail: CAC@nerubber.com

Phone 089-7674222

4.2 Make complaints or report clues verbally or in writing.

4.3 Complaint or whistle blowing box set up by the company.

4.4 In case the complainant chooses to remain anonymous details of facts must be provided or evidence that is clear enough. To show that there is a reasonable cause to believe that there is an action that violates the law, rules, regulations or business ethics of the company and fraud or corruption.

However, complaints or whistle blowing will be treated as confidential, and complainants or whistleblowers can complaints through more than one channel and the identity of the complainant is not required to be disclosed. If revealing themselves will make the company able to notify the result of the action or additional details in the complaint.

5. Investigation process

5.1 Complaint recipient will investigate or may assign a person or a trusted agency to investigate the facts and collect the misconduct or corruption as appropriate. By acting with independence and fairness, including the company will take disciplinary action or take legal action against offenders according to the whistle blowing policy for misconduct and corruption.

5.2 In the event that supervisors or complaint recipient receive clues about wrongdoing and corruption including found that such wrongdoing or corruption occurred. Notify the internal audit team within 7 days in order to proceed with the investigation procedures. As well as the internal audit team will prepare a register of complaints and clues about wrongdoing and corruption. A summary report is prepared and sent to the Audit Committee and the Executive Committee at least once a quarter.

5.3 Complaint recipient or authorized person can invite any employee or related person to provide information or request delivery of any documents involved to investigate the facts as appropriate on a case-by-case basis.

5.4 If verified and the true be found, the Company has the following measures:

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- In case of, the complaint is about the company violating the law, rules, regulations or the company's code of conduct. In which the complainant presents the matter found in the wrongdoing with comments and establishing guidelines for proper conduct to the authorized person for consideration. Moreover, in the event of an important matter such as affect the imaging reputation, the company's financial status, contrary to the operating policy, company business or involving high-ranking executives, etc. The Chairman of the internal audit committee shall notify such matters or facts and propose guidelines for action to propose the matter to the Audit Committee for initial consideration before presenting to the Board of Directors for consideration and acknowledgment in order to take appropriate action.

- In the event that the complaint causes damage to any person, the Company will propose appropriate and fair ways to alleviate the damage to the victim.

- The internal audit team is responsible for informing the progress and results of complaints / clues of misconduct and corruption to the complainant.

6. Protection of those who report information or provide clues about wrongdoing or corruption

6.1 Complainants or whistleblowers can choose to disclose themselves. If see that the disclosure may cause damage to yourself. But must specify the details of the facts or evidence that is clear enough to show that there is a reasonable cause to believe that there is an act that violates the law, rules, regulations or business ethics, including fraud or corruption. However, revealing themselves will allow the complainant to act more quickly.

6.2 Relevant information, the Company treats it as confidential and will disclose it as necessary with safety and the damage of the complainant. And not disclosed to unrelated persons, if infringe to comply is considered a disciplinary offense.

6.3 The company will protect and will not tolerate and intimidation employees or complainants or whistleblowers who have complained or notified clues of wrongdoing and corruption. As well as those who cooperate or assist in investigations in good faith.

6.4 The company will protect and will not demote, punish or give negative consequences to employees who refuse to commit wrongdoing or corruption. Even if that action will cause the company to lose business opportunities.

6.5 The Company will provide protection to complainants or whistleblowers who have interests in commercial transactions with the Company or other transactions. Even if that action will cause the company to lose business opportunities.

6.6 Those who suffer damage will be compensated by means of or procedures that are appropriate and fair.

6.7 The complainant or whistleblower has the right to be notified of the investigation result if the complaint does not continue.



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This Policy has been approved by the Board of Director's Meeting No. 7/2020 on 24 December 2020 to be effective from 1 January 2021 onwards.

-Mr. Chanitr Charnchainarong-
(Mr. Chanitr Charnchainarong)
Chairman of the Board of Director

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