



Policy Code: M11

Revision No.: 03

Effective Date: November 8, 2024

## Anti-Corruption Policy and Whistleblowing Policy

NorthEast Rubber Public Company Limited (the “Company”) places great importance on adhering to the principles of good corporate governance, conducting business with transparency, integrity, and accountability, as well as strictly complying with all applicable laws and regulations in a manner that is verifiable. Therefore, the Board of Directors has established this Anti-Corruption Policy and Whistleblowing Policy to guide the Company's operations as follows:

### Definitions

Corruption refers to the act of bribery in any form, including the offering, granting, promising, demanding, or receiving money, property, or other benefits that are inappropriate for public officials, government agencies, private entities, or individuals in positions of responsibility, either directly or indirectly, in exchange for influencing their actions or inaction in carrying out their duties. This may involve gaining or maintaining business or recommending business for the company, specifically, or obtaining or retaining other improper business-related benefits, unless permitted by law, regulations, announcements, local customs, or trade practices.

Fraud refers to seeking unlawful benefits for oneself or others through dishonest means, which are not legally justified.

### Anti-Corruption Policy

The company places great importance on opposing any acts related to corruption and bribery in all forms, whether direct or indirect, regardless of whether the company is acting as the receiver, giver, or offeror of bribes, whether in monetary or non-monetary form, to government agencies or private entities with which the company conducts business or interacts. The following key principles guide this policy:

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1. The company does not offer compensation, pay bribes, demand, agree to, or accept bribes from any individual or entity in any form, whether directly or indirectly, in exchange for favorable actions or to gain benefits related to the company's operations.
2. The company does not engage in illegal transactions involving government officials, individuals, or other entities, whether directly or indirectly.
3. The company does not donate or pay money to facilitate or support any individual or entity as a means of channeling bribes.
4. The company does not support, either directly or indirectly, any political party, political group, or political figure with money or other benefits to gain advantages in business operations or for personal or group benefit.

### Whistleblowing Policy

The Board of Directions has assigned the Audit Committee to review and handle complaints from all stakeholders. This process aims to protect and ensure fairness for those who report information or provide tips relates to corruption and misconduct within the company, as follow:

#### 1. Objectives

- 1.1 To encourage directors, sub-committees, executives, employees, and all stakeholders to report and provide tips regarding any misconduct or corruption related to the company.
- 1.2 To establish secure and confidential channels for reporting and disclosing misconduct and corruption, ensuring that individuals can confidently share their concerns.
- 1.3 To provide protection to whistleblowers or individuals who report misconduct and corruption, ensuring that they are not subjected to any form of harassment, intimidation, changes in job position, job responsibilities, work location, suspension, dismissal, cessation of business transactions, or any other unfair or harmful actions. The identity of the whistleblower and the information provided will be kept confidential.

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## 2. Definitions

2.1 **The Company** refers to NorthEast Rubber Public Company Limited.

2.2 **Employee** refers to all employees of the company, regardless of position, type, or level of management, including directors, sub-committees, and executives.

2.3 **Stakeholders** refers to not only employees and customers, but also partners, competitors, related organizations, communities, manufacturers, vendors, subcontractors, financial institutions, shareholders, trade creditors, trade debtors, investors, etc.

2.4 **Whistleblower** refers to any individual who discloses information about misconduct or unethical behavior that they have witnessed.

2.5 **Investigation Team** refers to the team appointed by the company, consisting of the head of the team and other members, to conduct preliminary investigations.

2.6 **Complaint Recipient** refers to the Chairman of the Audit Committee.

## 3. Eligibility to File Complaints or Report Tips

Stakeholders and other individuals, including the company's directors, sub-committees, executives, and employees, who witness actions that violate laws, regulations, company policies, announcements, or actions contrary to good corporate governance principles, business ethics, or corruption that may cause harm to the company, are entitled to file complaints or report such incidents. The company reserves the right to consider the following issues:

1. Job applications
2. Surveys or requests for information about the company
3. Requests for donations
4. Matters beyond the company's authority to address
5. Issues that do not contribute to the overall operations of the company

## 4. Methods for Filing Complaints and Reporting Tips

The company has established procedures and channels for filing complaints and reporting tips, which can be carried out by the whistleblower or individual reporting as follows:

4.1 Send a letter to the Chairman of the Audit Committee (who is an independent director) as follows:

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4.1.1 Mr. Ronachit Jinadit - Chairman of the Audit Committee  
North East Rubber Public Company Limited  
398 Moo.4 Kok Ma Sub-district, Prakhonchai District, Buriram 31140  
E-Mail: [cac@nerubber.com](mailto:cac@nerubber.com)  
Phone: 089-7674222

4.1.2 Company Secretary  
North East Rubber Public Company Limited  
398 Moo.4 Kok Ma Sub-district, Prakhonchai District, Buriram 31140  
Phone: 044-666928-9, Extension 126

#### 4.2 Complaints or Tip Reporting by Verbal or Written Means

#### 4.3 Complaint or Tip Reporting Box

4.4 In cases where the complainant chooses to remain anonymous, they must provide clear and sufficient factual details or evidence that reasonably indicates a violation of laws, regulations, company policies, business ethics, or involvement in corruption or misconduct.

All complaints or tips will be treated with the utmost confidentiality. Complainants or whistleblowers may submit their reports through more than one channel and are not required to disclose their identities. However, if the complainant chooses to reveal their identity, it will enable the company to provide updates or additional details regarding the resolution of the reported issue.

### 5. Fact-Finding Investigation Procedure

5.1 The recipient of the complaint or tip will conduct the investigation or may delegate the task to a trusted individual or unit to verify the facts and gather evidence regarding the alleged misconduct or corruption, depending on the case. The investigation will be carried out independently and fairly.

Furthermore, the company will impose disciplinary actions or pursue legal proceedings against the offenders in accordance with the policy on reporting misconduct and corruption.

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5.2 In cases where a supervisor or complaint recipient becomes aware of a tip-off or confirms the occurrence of misconduct or corruption, they must notify the Internal Investigation Team within seven (7) days to initiate the established investigation procedures.

The Internal Investigation Team is required to maintain a registry of complaints and reports of misconduct or corruption and prepare a summary report to be submitted to the Audit Committee and the Executive Committee for acknowledgment at least once per quarter.

5.3 The complaint recipient or their designee may invite any employee or relevant individual to provide information or request the submission of any related documents as necessary to investigate and establish the facts, depending on the specifics of each case.

5.4 If the investigation confirms the validity of the allegations, the company will take the following actions:

## 6. Protection for Whistleblowers or Informants

6.1 Whistleblowers or informants may choose to disclose their identity if they believe that anonymity could lead to personal harm. However, they must provide sufficient factual details or clear evidence demonstrating reasonable grounds to believe that violations of laws, regulations, company rules, codes of conduct, or incidents of misconduct, including fraud or corruption, have occurred.

If they choose to disclose their identity, it will enable the complaint recipient to address the matter more promptly and efficiently.

6.2 All information related to the complaint or whistleblowing is considered confidential by the company and will only be disclosed when absolutely necessary, with careful consideration of the safety and potential harm to the whistleblower or the source of the information.

Those responsible for handling the matter at every step are required to maintain the highest level of confidentiality regarding the information received and must not disclose it to any unauthorized person. Any breach of this obligation will be regarded as a disciplinary offense.

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6.3 The company will provide protection and will not tolerate any form of intimidation, harassment, or retaliation against employees, whistleblowers, or informants who have reported or disclosed information related to misconduct or corruption. This protection also extends to individuals who cooperate or assist in the investigation with good intentions.

6.4 The company will provide protection and will not demote, penalize, or impose any negative consequences on employees who refuse to engage in misconduct or corruption, even if such actions result in the company losing business opportunities.

6.5 The company will provide protection to whistleblowers or informants who have a vested interest in business transactions with the company or other related transactions, even if such actions result in the company losing business opportunities.

6.6 Those who have suffered harm or damage will receive appropriate and fair compensation or remediation through methods or processes deemed suitable by the company.

6.7 The person who is the subject of the complaint or the whistleblower has the right to be notified of the results of the investigation if the complaint is not pursued further.

## Penalties

In the event that directors, executives, employees, and workers of the company violate, neglect, or intentionally fail to comply with the anti-corruption policy and the whistleblowing policy, it will be considered a disciplinary offense. Such offenses will be subject to disciplinary action in accordance with the company's established rules and regulations. Additionally, legal penalties may apply if the actions are found to be unlawful. Furthermore, claiming ignorance of this policy and/or relevant laws will not be accepted as an excuse for non-compliance.

## Review and Revision of Policy

The policy on anti-corruption will be reviewed and revised at least once a year, or whenever there are significant changes.

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The Anti-Corruption Policy and Whistleblowing Policy has been approved by the Board of Directors at the 8th meeting of 2024 on November 7, 2024, and will be effective starting from November 8, 2024.

(Mr. Ronachit Jinadit)

Chairman of the Audit Committee

(Mr. Chanitr Chanchainarong)

Chairman of the Board of Directors

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