Purpose

Tong Thai Rubber Group is dedicated to maintaining the highest ethical standards across all its business operations. Our corporate policies are consistently enforced across all entities within the group to ensure transparency, fairness, and accountability. This policy outlines our approach to addressing:

- Anti-Corruption and Bribery
- Responsible Information Management and Data Compliance
- Conflict of Interest
- Money Laundering and Terrorist Financing
- Fraud and Embezzlement

Scope of Application

This policy applies to all employees, management, contractors, suppliers, and business partners associated with Tong Thai Rubber Group, including its subsidiaries:

- Tong Thai Rubber Co., Ltd.
- Tongthai Technical Rubber Co., Ltd.
- Sin Tong Thai Rubber Co., Ltd.
- Grand Rubber Co., Ltd.
- TTN Rubber Co., Ltd.

All individuals and entities covered by this policy must adhere to the highest standards of integrity, honesty, and ethical conduct in all business dealings.

Code of Ethics Policy

1. Anti-Corruption and Bribery

Tong Thai Rubber Group prohibits any form of bribery, corruption, or unethical influence in our operations and adopts a zero-tolerance approach to bribery in any form, including offering, giving, soliciting, or accepting bribes.

General Directive

The company prohibits anyone acting on company's behalf, directly or indirectly, from making or receiving improper payments.

- Improper payments mean receiving or paying bribes, or giving, offering or promising to give money or anything else of value to any person, including any Government Official, in order to improperly influence any act or decision of a person, or to otherwise gain an improper benefit for the Company.

- Bribes are not limited to cash. A bribe can be gifts, travel, meals, entertainment, offers of employment, and charitable or political contributions.

- A Government Official may include, but is not limited to, any official or employee of a government, official or employee of a public international organization, member of a political party, candidate for political office, or any official or employee of a state-owned business enterprise. The use of Tong Thai Rubber Group funds or assets for any illegal, improper, or unethical purpose is strictly prohibited.

- Compliance with this Anti-Corruption Policy and Bribery is required of all associates and third parties engaged to interact or who may interact with Government Officials on the Company's behalf. All associates are responsible for ensuring that third parties with whom they interact fully understand and follow the Policy in all activities related to Tong Thai Rubber business.

Our employees must not:
- Accept or offer improper payments including bribe, kickback, or improper payment.
- Use third parties (including agents, consultants, or intermediaries) for improper activities.
- Accept gifts, hospitality or entertainment beyond what is considered customary or reasonable.
- Falsify records, invoices, or other documentations to conceal corrupt activities.
- Use their position within the group to for personal gain such as extracting benefits, privileges or services.
- Engage in activities that breach anti-corruption and bribery laws or regulations in any jurisdiction.
- Neglect to report known or suspected incidents of bribery, corruption or unethical behavior.
- Request confidential or proprietary information from competitors or stakeholders in exchange for benefits.

We are committed to:
- Maintaining effective controls on the disbursement of funds and other assets to ensure disbursements are not made for improper purposes.
- Developing measures to ensure books and records accurately reflect the assets disposition.
- Having clearly articulated standards of behavior as included in Tong Thai Rubber Policies, which shall be well publicized to all of Tong Thai Rubber operations.
- Conducting training of executives, associates and, where appropriate, third parties regarding relevant anticorruption and Bribery standards and procedures.
- Conducting internal or a third-party audit for compliance with the anti-corruption procedures, including review of expenditures for operations that interact with Government Officials.
- Providing a robust method to report or seek guidance on actual or potential anti-corruption issues that is effectively publicized, as well as procedures for responding to such reports or requests.
- Maintaining a confidential and accessible platform for reporting unethical practices through Whistleblowing System.

2. Responsible Information Management and Data Compliance

Tong Thai Rubber Group is committed to the secure, ethical, and transparent management of all business, employee, farmer, supplier and customer data, encompassing both personal and organizational information. We prioritize data integrity, privacy, and security by implementing robust safeguards, adhering to relevant data protection regulations, and promoting ethical data usage. Our approach ensures that sensitive information is collected, stored, and used responsibly, fostering trust among our stakeholders while upholding the highest standards of compliance and accountability.

General Directive
A violation of responsible information management occurs when the employee fails to handle data in a manner that protects its integrity, privacy, security, or ethical usage. Key violations include:

- Collecting personal or sensitive information without proper consent.
- Using data for purposes not disclosed to or agreed upon by the data subject.
- Failing to properly anonymize data that should not identify individuals.
- Not implementing sufficient safeguards, such as encryption, firewalls, or secure access controls.
- Allowing unauthorized access due to careless management (e.g., weak passwords or lack of monitoring).
- Not informing affected individuals or regulators about a security breach in a timely manner.
- Retaining data longer than necessary or beyond the stated purpose.
- Using tools to monitor individuals or employees without valid reasons or consent.
- Allowing data usage to perpetuate biases or discriminate against groups.
- Violation of Data Protection Laws
- Transferring data across jurisdictions without adhering to applicable regulations.
- Not adhering to requirements for informed and explicit consent when collecting personal information.
- Altering data to mislead stakeholders or manipulate decisions.
- Failing to ensure data accuracy or knowingly disseminating false information.
- Not informing individuals about how their data is collected, used, shared, or stored.
- Using algorithms or AI systems without disclosing their decision-making processes or biases.
- Selling or sharing personal or confidential data with third parties without consent.
- Tracking employee activity without clear communication or policy.

We are committed to:
- Empowering appropriate oversight of our data and technology through accountable management.
- Shaping decisions regarding new technologies, services, and data use to align with our Digital Trust Commitments.
- Safeguarding the use of customer and associate information to protect confidentiality and maintain trust.
- Protecting our information and digital infrastructure by implementing cybersecurity systems to prevent breaches and data leaks.

- Developing and enforcing robust data privacy guidelines aligned with international standards such as GDPR or equivalent.
- Restricting access to sensitive information to authorized personnel only.
- Maintaining a rapid-response system for managing data breaches and mitigating impacts.

Data Breach Management

In the event of a data breach, Tong Thai Rubber Group will take the following steps:

- **Immediate Reporting:** Employees must report any data breaches to the compliance officer.
- **Investigation & Containment:** Affected systems and data will be secured, and an internal investigation will be conducted.
- **Notification & Remediation:** Relevant authorities and affected individuals will be notified as required by law, and corrective actions will be implemented.
- **Customer Communication:** Affected customers will be informed in a timely manner with clear and transparent communication regarding the nature of the breach, the potential impact, and any recommended actions they should take.

Safeguarding Sensitive Technical Know-How

To protect sensitive technical know-how, Tong Thai Rubber Group will implement the following measures:

- **Access Controls:** Implement strict access controls to limit access to sensitive technical information based on roles and responsibilities.
- **Confidentiality Agreements:** Require employees, contractors, and third-party partners to sign non-disclosure agreements (NDAs) to protect proprietary information.
- **Data Encryption:** Encrypt sensitive technical documents and communications to prevent unauthorized access.
- **Secure Storage and Transfer:** Ensure secure storage of technical documents and use encrypted channels for data transfers.
- **Employee Training:** Provide regular training on the importance of protecting sensitive information and recognizing potential security threats.
- **Monitoring:** Monitor access logs to detect and prevent unauthorized activities.
- **Incident Response Plan:** Establish a clear incident response plan to handle breaches or leaks of technical information.

3. Conflict of interest

Tong Thai Rubber Group recognizes that fair and objective decisions build trust with our employee, customers, and third parties. A conflict of interest occurs when personal interests interfere with, or may appear to interfere with, our work at Tong Thai Rubber Group. While we cannot list every circumstance, it is important for all employees to know and avoid the common situations that could create a conflict or the perception of a conflict. Outside employment, financial investments, gifts and entertainment, and personal relationships are areas where conflicts can arise.

We expect our employees to act in the best interest of our group and require them to disclose any situation where personal interests conflict or may conflict with the interests of the organization.

Our employees must not

- Work for a competitor while you are a management or a salaried employee.
- Use your Tong Thai Rubber Group role to promote your side business or use Tong Thai Rubber Group resources to compete with Tong Thai Rubber Group or reflect negatively in any way on Tong Thai Rubber Group.
- Take opportunities for yourself that you discover through your position or the use of Tong Thai Rubber Group property or information.
- Invest in a Tong Thai Rubber Group supplier if you can influence Tong Thai Rubber Group’s relationship with that supplier.
- Have a substantial interest (for example, stock ownership) in a competitor.
- Supervise or be directly involved in the hiring of a family member.
- Engage in outside interests that divert time and attention from properly attending to Tong Thai Rubber Group affairs.
- Disclose any confidential information in relates to Tong Thai Rubber Group which will potentially harm and damage the companies under the group.

We are committed to:

- Implementing a declaration process for employees to disclose potential conflicts.
- Conducting regular training sessions to educate employees on identifying and managing conflicts of interest.
- Restricting decision-making roles for individuals with identified conflicts. We require the individuals to recuse themselves from discussions, negotiations or decisions where a conflict exists or could be perceived.
- Enforcing mandatory reporting of any potential or actual conflicts to the management.
- Implementing segregation of duties through checks and balances especially in high-risks operations.

4. Money Laundering and Terrorist Financing

Money laundering is the process of concealing the origin, ownership, or destination of illegally obtained funds by integrating them into legitimate financial activities, making the money appear lawful. Terrorist financing involves the collection or provision of funds, regardless of their origin, to support terrorist activities.

We are committed to complying with all relevant laws and regulations to prevent both money laundering and terrorist financing. Any suspicious transactions will be reported to the appropriate authorities. Our goal is to proactively prevent, detect, and respond to fraudulent activities to safeguard our assets, reputation, and compliance with legal obligations.

General Directive:
Money laundering and terrorist financing facilitate various criminal activities, including fraud, drug trafficking, and terrorism. Employees must remain vigilant and report any suspicious behavior to management, particularly the following red flags:

- Individuals provide incomplete, false, or suspicious information, refusing to answer questions, or withholding identification.
- Transactions structured to evade reporting requirements, such as multiple small transactions below the legal threshold.
- Payments made with multiple money orders, large amounts of cash, or anonymous sources.
- Unusually large purchases of prepaid products, such as gift cards.
- Purchasing gift cards on behalf of an unknown party, including for government agencies like tax authorities or law enforcement.
- Business partners or customers who have ties to sanctioned or high-risk entities or jurisdictions.
- Transactions with organizations that lack a clear business purpose or involve large sums without a logical explanation.
- Requests for payments to third parties without clear justification.

We are committed to:

- Conducting thorough due diligence on business partners before onboarding, ensuring no links to criminal or terrorist activities.
- Establishing a secure whistleblowing channel for reporting suspicious activities confidentially.
- Providing regular training programs to enhance awareness of money laundering and terrorist financing schemes.
- Monitoring financial transactions and ensuring compliance with anti-money laundering (AML) and counter-terrorist financing (CTF) regulations.
- By enforcing these measures, we strengthen our commitment to ethical business practices and regulatory compliance. Employees play a crucial role in identifying and reporting potential risks to help prevent financial crimes.

5. Fraud and Embezzlement

Fraud involves intentional deception or the distortion of facts to gain an unfair advantage, secure unauthorized benefits, or inflict harm on individuals, organizations, or entities. It is often carried out with the purpose of misappropriating resources, manipulating outcomes, or undermining trust. Our group prohibits fraudulent activities, including misrepresentation of information, forgery, and embezzlement.

General Directive

Our employees must not engage in any form of deliberate deception intended to secure unlawful or unfair gain, including but not limited to the following actions:

- Falsifying financial records or reports
- Using company funds without proper authorization.
- Manipulating procurement processes, such as engaging in favouritism or accepting kickbacks.
- Stealing or embezzling company property or resources.
- Misrepresenting qualifications, credentials, or experience.
- Engaging in insider trading or misusing confidential company information.

We are committed to:

- Establishing strong internal controls, such as segregation of duties, approval hierarchies, and regular audits to prevent and early identify fraud.
- Conducting due diligence on all vendors, partners, and contractors to identify potential risks.
- Utilizing data analysis tools to monitor and detect irregularities in transactions or operations.
- Performing regular audits of financial records, procurement processes, and operational activities.
- Providing regular fraud awareness training for employees to help them recognize and prevent fraudulent activities.
- Establishing a secure and anonymous Whistleblower channel for reporting suspected fraud.

Targets:

1. To train at least 80% of our employees in Code of Ethics Policy by 2030.
2. To ensure at least 80% of new onboarding business partners undergo a comprehensive due diligence process, including assessment of business ethics, legal compliance, and information security by 2030.
3. To ensure that at least 80% of our operating sites are covered under comprehensive risk assessments addressing corruption, fraud, money laundering and terrorist financing, conflicts of interest, and information security breaches by 2030.
4. To ensure that at least 80% of our operating sites are covered under audit of internal control systems by 2030 to identify and mitigate vulnerabilities related to business ethics and information security.

Responsibilities

1. Management

Management of the respective companies under the Group is responsible for overseeing the effective implementation of this ethics policy, periodically reviewing and updating it to ensure its relevance, and providing adequate resources to support all teams in understanding and performing ethical practices across operations.

2. Employees

All employees are responsible for adhering to the principles and requirements outlined in the ethics policy. This includes demonstrating integrity in all business dealings, avoiding conflicts of interest, adhering to anti-corruption and anti-bribery practices, complying with anti-money laundering rules and regulations, and ensuring compliance with established company policies and legal requirements. Employees are expected to report any unethical behavior or violations and to act as role models in promoting a culture of accountability and ethical conduct.

Communication of Policy

The policy is introduced during the onboarding process for new staff and shared via hardcopy or email. Updates or amendments to the policy are to be communicated through announcement board or email to all full-time, part-time, and contractual employees. An annual refresher course is conducted for all employees to reinforce the organization's commitment to ethics and the principles outlined in this policy.

Review of Policy

This policy will be evaluated its relevance every 2 years, to monitor compliance and to drive continuous improvement. Tong Thai Rubber Group welcomes feedback and encourages dialogue with any interested party. We ensure the organization remains at the forefront of environmental practices.

Sanctions

Tong Thai Rubber Group takes this policy very seriously. We expect all employees and suppliers to abide by the principles laid out in this policy. Failure to comply with this policy may result in disciplinary action, up to and including termination of employment.

We encourage all stakeholders to report any potential or actual infringements of this policy at the soonest. Any potential or actual infringements may be reported to feedback@tongthai.co.th. All reports are treated with the utmost confidentiality. While it is helpful for follow-up if you identify yourself, you have the option to make anonymous report to the helpline +66 9 1889 2288, within the limit of the law. Concerns should be raised in good faith, meaning you are making genuine effort to provide accurate and honest information. Tong Thai Rubber Group has a strict no-retaliation policy for individuals who report concerns or participate in investigations. Any employee found to be engaging in retaliation will face disciplinary action.

Disciplinary Consequences for Non-Compliance

Employees found in violation of the Tong Thai Rubber Group Ethics Policy will face disciplinary actions commensurate with the severity of the misconduct. This may include penalties up to and including termination of employment. In cases involving serious offenses, the matter may also be referred to the appropriate law enforcement authorities.

Minor Offence: Verbal Warning

The line manager will meet with the individual to address the issue, ensuring him or her understand the nature of the problem or violation and the steps needed to rectify it. This discussion serves as a reminder of the relevant policies or performance expectations and employee responsibility to adhere to them. Documentation of the incident will be filed in employee's personnel file and will be made available upon request.

Medium Offence: Written Warning and Reassignment/Demotion

For repeated minor offenses or more serious violations, employee will receive a formal written warning outlining the issue, expectations for improvement, and potential consequences of further non-compliance. Depending on the severity of the matter, employee may also be reassigned to a different role or demoted from a managerial position. The written warning will be documented in employee's personnel file and discussed to ensure clarity and understanding.

Serious Offence: Termination

If employee's performance does not improve within a pre-defined period after a Written Warning or if further violations occur, employee will be terminated - final step of Tong Thai Rubber Group's disciplinary policy.

Signature

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General Manager of
Tong Thai Rubber Group
Ms. Shi Ching Chien
Date: 10/01/2025