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## Whistleblowing Policy

### Purpose

Tong Thai Rubber Group is committed to maintaining ethical business practices and fostering a transparent and responsible corporate culture. This Whistleblowing Policy provides a confidential and secure mechanism for employees, suppliers, and stakeholders to report misconduct or unethical behavior without fear of retaliation. The objective is to ensure that all concerns related to integrity, compliance, and ethical behavior are appropriately addressed and rectified.

### Scope of Application

This policy applies to all employees, contractors, suppliers, and stakeholders associated with Tong Thai Rubber Group. It ensures that individuals at all levels can report concerns in good faith, knowing that their disclosures will be handled professionally, confidentially, and with fairness.

### Reporting Issues

Employees and stakeholders are encouraged to report any concerns related to the following issues:

- **Child Labor and Forced Labor:**  
Any employment of underage workers or forced labor practices within the company or its supply chain, including any form of human trafficking or exploitative labor practices.
- **Harassment, discrimination, or unethical workplace conduct**  
Any form of workplace discrimination, harassment, bullying, or abuse, including discrimination based on gender, race, religion, nationality, disability, or any other protected characteristic.
- **Fraud, bribery, or corruption**  
Fraud, bribery, financial misconduct, unethical business conduct, conflicts of interest, kickbacks, or violations of anti-corruption laws and company policies.
- **Information Security Breach:**  
Unauthorized access, misuse, or disclosure of confidential or sensitive company, employee, or customer data, including cybersecurity threats or intentional sabotage of company systems.

### Reporting Mechanism

Employees and stakeholders can report concerns through the following confidential channels:

- Dedicated Email Address: **[grievance@tongthai.co.th](mailto:grievance@tongthai.co.th)** - A secure email account for submitting whistleblowing reports.
- Confidential Phone Line: +66 918892288 - A direct hotline available for reporting sensitive matters.
- Anonymous Online Reporting System: A web-based platform allowing anonymous submissions.
- Whistleblowing Officer: Direct communication with the designated officer responsible for handling whistleblowing reports.



## Whistleblowing Policy

Reports should include as much detail as possible, including dates, locations, persons involved, evidence, and any other relevant information to facilitate a thorough investigation.

### Confidentiality

All reports will be treated with the highest level of confidentiality. The identity of the whistleblower will not be disclosed without explicit consent, unless legally required. The company is committed to protecting whistleblowers from any form of exposure that could put them at risk.

### Non-Retaliation Principle

Tong Thai Rubber Group strictly prohibits any form of retaliation against individuals who report misconduct in good faith. Retaliatory actions, including termination, demotion, harassment, discrimination, intimidation, or any form of adverse employment consequence, will result in strict disciplinary measures, including potential termination of employment for those responsible.

### Investigation Procedures & Disciplinary Actions

For issues related to **Child Labor / Discrimination & Harassment**, the following investigation procedures will be followed:

1. **Initial Assessment:** Upon receiving a report, the Whistleblowing Officer will conduct a preliminary review to determine its validity, urgency, and severity.
2. **Formal Investigation:** If necessary, an internal investigation team comprising compliance officers, HR representatives, and legal advisors will be assigned to gather evidence, interview relevant parties, and assess the situation in accordance with company policies and legal requirements.
3. **External Investigation:** If the case involves potential legal violations, regulatory authorities or third-party auditors may be engaged to ensure impartiality and compliance with external regulations.
4. **Corrective Action:** Based on the investigation findings, appropriate corrective actions will be implemented, including disciplinary measures, policy revisions, employee training, supply chain audits, and, where applicable, legal actions against responsible parties.
5. **Follow-Up & Closure:** The case will be monitored to ensure resolution, and whistleblowers may receive feedback on the outcome, subject to confidentiality considerations.



## Whistleblowing Policy

### Disciplinary Actions

Employees, suppliers, or contractors found guilty of violations related to Child Labour, Discrimination & Harassment, Corruption, or Information Security Breach will face strict disciplinary actions, including but not limited to:

- **Child Labor / Forced Labor:** Immediate termination of employment or contract, reporting to relevant legal authorities, and blacklisting from future employment or partnership with Tong Thai Rubber Group.
- **Discrimination & Harassment:** Written warnings, suspension, mandatory training, demotion, or termination based on severity, with repeat offenses leading to dismissal.
- **Corruption:** Immediate dismissal, legal prosecution, financial penalties, and permanent exclusion from any future roles within the company or supply chain.
- **Information Security Breach:** Suspension, dismissal, and possible legal actions, including damages recovery and reporting to law enforcement in cases of severe data breaches.

All disciplinary actions will align with company policies, local labor laws, and international human rights and compliance standards. Continuous tracking and assessment of similar issues will be conducted to prevent recurrence.

### Awareness & Training

To ensure effective implementation of this policy, Tong Thai Rubber Group will:

- Conduct regular training sessions for employees on ethical conduct and whistleblowing procedures.
- Communicate whistleblowing reporting channels clearly through internal communications, posters, and the company's website.
- Encourage an open corporate culture where employees feel safe to voice concerns.

### Roles & Responsibilities

- **Employees & Stakeholders:**  
Report concerns promptly and cooperate with investigations.
- **Management:**  
Promote a culture of integrity and ensure compliance with this policy.
- **Compliance Team:**  
Assess, investigate, and maintain confidentiality in handling reports



## Whistleblowing Policy

### Policy Review & Updates

This policy will be reviewed periodically to ensure its effectiveness and alignment with regulatory and ethical standards. Updates will be made as necessary to strengthen protections, enhance reporting mechanisms, and reinforce the company's commitment to ethical practices.

Tong Thai Rubber Group is committed to upholding this Whistleblowing Policy to maintain an ethical, safe, and fair workplace for all employees, stakeholders, and business partners.

### Signature

A handwritten signature in blue ink, appearing to read 'Cui'.

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