# Due Diligence System Public Summary Report

## Tong Thai Rubber Group

*Reporting Period: 1 July 2025 - 30 June 2026 | Version 1.0 | Published: 1 July 2026*

# Introduction to Our Report

This report outlines the Due Diligence System (DDS) implemented by Tong Thai Rubber Group, comprising the following entities:

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

This report describes the due diligence processes implemented by Tong Thai Rubber Group in the sourcing, processing, and supply of natural rubber products that fall within the scope of the European Union Deforestation Regulation (EU) 2023/1115 (EUDR).

## About the European Union Deforestation Regulation (EUDR)

The EUDR establishes mandatory due diligence requirements for Operators and Traders placing relevant commodities and products on the EU market or exporting them from the EU. Under the Regulation, only products that are deforestation-free (produced on land that has not been subject to deforestation after 31 December 2020) and produced in accordance with the applicable legislation of the country of production may be placed on, made available on, or exported from the EU market.

- For natural rubber, this requires supply chain operators to demonstrate that the rubber originates from production areas that comply with the EUDR requirements through appropriate due diligence procedures, traceability, risk assessment, and risk mitigation.
- Applicable legislation of the country of production includes, where relevant:
- Land use rights
- Environmental protection
- Forest-related regulations
- Third parties' rights
- Labour rights
- Human rights protected under international law
- The principle of Free, Prior and Informed Consent (FPIC), including as reflected in UNDRIP
- Taxation, anti-corruption, trade, and customs legislation

## Our Commitment to EUDR Compliance

Responsible sourcing is fundamental to Tong Thai Rubber Group's business strategy and sustainability commitments. To meet the requirements of the EUDR and the expectations of our customers and stakeholders, TTR Group has developed and implemented a comprehensive Due Diligence System aligned with the EUDR and the Global Platform for Sustainable Natural Rubber (GPSNR) Policy Framework.

Our Due Diligence System establishes a structured, risk-based approach to:

- Collect and verify supply chain information;
- Ensure full traceability to the production plot through Georubber.net;
- Identify and assess risks relating to deforestation, legality, and responsible sourcing;
- Implement appropriate risk mitigation measures;
- Monitor the effectiveness of mitigation actions; and
- Maintain records and transparent communication with customers and stakeholders.

To strengthen the credibility and robustness of our Due Diligence System, Tong Thai Rubber Group has undergone independent assessment and verification by Bureau Veritas and Preferred by Nature.

## Public Reporting and Transparency

Tong Thai Rubber Group believes transparent reporting is essential to effective due diligence, enabling customers, business partners, investors, suppliers, employees, regulators, local communities, and other stakeholders to understand how sustainability risks are identified, assessed, mitigated, monitored, and communicated throughout our natural rubber supply chain. This report will be published annually and made publicly available through TTR Group's corporate website.

## Scope of This Report

This report summarizes the implementation and performance of Tong Thai Rubber Group's Due Diligence System during the reporting period 1 July 2025 - 30 June 2026, including:

- An overview of the natural rubber products and supply chains covered by the Due Diligence System.
- The information collection, traceability, and risk assessment methodologies used to evaluate compliance with EUDR requirements.
- Risk mitigation measures implemented, including supplier engagement, corrective actions, monitoring, and independent verification.
- Stakeholder engagement activities undertaken to support responsible sourcing and effective due diligence.
- Where applicable, remediation measures are implemented to address identified adverse impacts.

Signed by:

Ms. Shi Ching Chien
Sustainability Officer
Tong Thai Rubber Group
Date: 1 July 2026

# 1. General Information

| | |
|---|---|
| **Organization Name** | Tong Thai Rubber Co., Ltd. (Tong Thai Rubber Group) |
| **Organization Address** | 984/52 Sukhumvit Road 71, Khlong Tan Nuea, Watthana, Bangkok 10110, Thailand |
| **Organization Website** | https://www.tongthai.co.th |
| **Public Summary Report Contact Person** | Ms. Shi Ching Chien, Sustainability Officer |
| **Public Summary Report Contact Details** | eudr@tongthai.co.th \| +66 2 390 2051 |
| **Version / Date Last Reviewed** | Version 1.0 - 1 July 2026 |
| **Reporting Period Specific to This Report** | 1 July 2025 - 30 June 2026 |

## Product Scope of the Due Diligence System

The DDS covers natural rubber and natural rubber products sourced, processed, manufactured, and supplied by Tong Thai Rubber Group that fall within the scope of the EUDR, including:

- Standard Thai Rubber (STR), including STR20 and other STR grades, as well as mixture rubber and compounded rubber
- Ribbed Smoked Sheets (RSS)

The DDS covers the entire upstream natural rubber supply chain, including registered smallholders, vendors, cooperatives, collection centers, central markets, and auction markets.

## Sustainability Scope of the Due Diligence System

The DDS has been established in accordance with the EUDR, the GPSNR Policy Framework, TTR Group's Sustainable Procurement Policy, and the applicable national legislation of the country of production.

It addresses risks relating to deforestation and forest degradation, legal compliance, land tenure and land use rights, environmental protection, biodiversity conservation, labor rights and occupational health and safety, human rights, the principle of Free, Prior and Informed Consent (FPIC), where applicable, anti-corruption and ethical business conduct, and supply chain traceability and transparency.

## Organization Scope of the Due Diligence System

| | |
|---|---|
| **Tong Thai Rubber Co., Ltd.** | Corporate head office, sustainability management, sales and export administration |
| **Tongthai Technical Rubber Co., Ltd.** | Procurement and STR/TSR manufacturing facility |
| **Sin Tong Thai Rubber Co., Ltd.** | Procurement and STR/TSR manufacturing facility |
| **Grand Rubber Co., Ltd.** | Procurement and RSS manufacturing facility |
| **TTN Rubber Co., Ltd.** | Procurement and RSS manufacturing facility |

These facilities operate under the Group's integrated Due Diligence System, implementing common policies, procedures, supplier approval processes, traceability requirements, risk assessment methodologies, monitoring activities, and continual improvement program.

### Assurance System

TTR Group's Due Diligence System has been independently assessed through:

- Preferred by Nature – EUDR Sustainability Framework Assessment
- Bureau Veritas - Independent Verification / Assessment (Report Reference: TTT-EUDR-202501)

## 2. Product and Commodity Information

The table below summarizes the products, raw materials, and Supply Areas covered by this report.

| Product | HS/CN Code | Relevant Commodity | Species (common / scientific) | Country of Production | Supply Area Code |
|---|---|---|---|---|---|
| Standard Thai Rubber STR10, 20, 5L, 5CV | 4001.22.30 | Natural rubber | Para rubber / Hevea Brasiliensis | Thailand | 1 |
| Ribbed Smoked Sheet RSS1, 2, 3, 4, 5 | 4001.21.00 | Natural rubber | Para rubber / Hevea Brasiliensis | Thailand | 1, 2 |
| Compound Rubber | 4005.10.00 | Natural rubber compounded with carbon black | Para rubber / Hevea Brasiliensis | Thailand | 1 |
| Mixture Rubber | 4002.80.00 | Natural rubber mixed with synthetic rubber | Para rubber / Hevea Brasiliensis | Thailand | 1 |

## 3. List of Supply Areas

| Code | Supply Area | Description |
|---|---|---|
| 1 | Thailand - Registered Smallholder Rubber Plantations (Direct Vendor Network) | Natural rubber raw material sourced through TTR Group's approved vendor/collector network. Individual smallholder plots are registered, GPS-mapped, and monitored via Georubber.net, TTR Group's in-house geo-mapping and traceability platform (EUDR SOP 4.1.1-4.1.20). |
| 2 | Thailand - Rubber Authority of Thailand (RAOT) Central Markets | EUDR-compliant raw material occasionally sourced through RAOT central markets. Verified using RAOT-issued due diligence documentation (polygon/GeoJSON data), validated by TTR Group using QGIS prior to merging into the traceability system (EUDR SOP 4.1.23). |

# 4. Supply Area Risk Assessment Summaries

For each Supply Area, TTR Group conducts EUDR-related risk assessments as part of its Due Diligence System, incorporating Georubber.net-based legality surveys, plot-level GPS mapping, and deforestation-free analysis. The Group's interpretation of legal production is aligned with Article 2(40)(a)–(h) of the EUDR and is reflected in its internal **Legality Risk Analysis Procedure** (EUDR SOP 4.1.10).

## Supply Chain Complexity (Art. 10(2)(i))

Natural rubber is sourced and delivered to TTR Group's manufacturing facilities through one of four supply chain configurations. Each transaction is recorded at the lot level in Georubber.net, enabling transactional traceability throughout the supply chain. The applicable supply chain configuration for each lot is disclosed in the shipment-specific Due Diligence Report (DDR) issued to customers, together with any applicable leakage mitigation measures (e.g. direct accounting for Tier 1 lots, segregation monitoring for Tier 2+ lots):

- Directly from smallholders to TTR Group factories (Tier 1)
- Smallholder to Vendor to TTR Group factory (Tier 2)
- Smallholder to Cooperative to Vendor to TTR Group factory (Tier 3)
- Smallholder to Rubber Authority of Thailand (RAOT) Central Market to TTR Group factory (Tier 3)

## Per-Shipment Due Diligence Reports

For each shipment, TTR Group issues a plot-level Due Diligence Report (DDR) to its customers. The DDR includes plot identification, plot size, Tier 1 supplier information, harvest and processing dates, supply chain configuration and applicable leakage mitigation measures, deforestation analysis (including the data layer used, assessment result, mitigation measures, and final status), land tenure, overlap with strict protected areas or restricted-use/reserved forests, environmental protection, labor and human rights, FPIC and land conflict, trade, taxation, and anti-corruption indicators, as well as the final EUDR compliance status, production quota, and origin (country, province, and district).

**Supply Area 1 - Thailand: Registered Smallholder Rubber Plantations**

| Legality / Deforestation Category | Description of Information & Evidence Obtained and Used to Assess the Risk | Risk Designation |
|---|---|---|
| **'Deforestation-Free' Commodities**<br>*Art. 2(3)(4)(5)(6)(13); Art. 3* | Each registered plot polygon is cross-checked against Global Forest Watch (GFW) Tree Cover Loss data (canopy density >10%) and Integrated Deforestation Alerts (GLAD-L, GLAD-S2, RADD), Thailand's national Reserved Forest dataset, and Thailand's Protected Areas dataset. Plot boundaries are mapped by GPS (mobile tagging, coordinate search, or Thai Department of Land records) and recorded in Georubber.net. The cut-off date applied is 31 December 2020. Where tree cover loss is detected, dated, geotagged photographic evidence is required to confirm active rubber cultivation. | Negligible risk |
| **1: Land Use Rights**<br>*Art. 2(40)(a)* | Each smallholder or vendor provides documentation evidencing land use rights or agricultural production, including land title documents (e.g., Nor Sor 3, Nor Sor 3 Gor, Sor Por Kor, Tor Bor 5, or other land title documents), agricultural registration books, RAOT replanting books, or other RAOT-issued registration documents. These records are uploaded to Georubber.net. | Negligible Risk |

| Legality / Deforestation Category | Description of Information & Evidence Obtained and Used to Assess the Risk | Risk Designation |
|---|---|---|
| **2: Environmental Protection**<br>*Art. 2(40)(b)* | Each plot is assessed for cultivation on peatland and the associated use of chemicals; the presence of rare or protected flora and whether any vegetation has been removed for plantation expansion; the presence of birds, insects, reptiles, and amphibians, together with the potential impacts of pesticide and herbicide use; proximity to Important Bird and Biodiversity Areas (IBAs) and wetlands; and the presence of, and interactions with, wild mammals, including human–wildlife conflict, hunting, and trapping. | Negligible Risk |
| **3: Forest-Related Regulations**<br>*Art. 2(40)(c)* | As natural rubber is an agricultural commodity rather than a primary forest product, TTR Group assesses forest-related legal status through the same protected area and reserved forest assessments used in its deforestation-free analysis (see above), rather than through a separate harvesting-specific assessment. | Negligible Risk |
| **4: Third Parties' Rights**<br>*Art. 2(40)(d)* | The legality survey assesses whether any unresolved land disputes exist with Indigenous Peoples or local communities and evaluates how land use rights are recognized where no formal land title exists, including through physical or customary boundary demarcation, long-term occupation, or other supporting evidence. | Negligible Risk |
| **5: Labour Rights**<br>*Art. 2(40)(e)* | The legality survey and vendor audits assess labor-related risks, including child labor (household members under 18 years of age working on the farm, average working hours per day, and tasks performed by each age group), the presence of 10 or more workers and compliance with employment reporting requirements, wage calculation methods and average wages and working hours, and worker consent (written or verbal) to undertake work on the plantation. | Negligible Risk |
| **6: Human Rights**<br>*Art. 2(40)(f)* | The assessment covers indicators of forced or bonded labor and, where foreign workers are employed, verifies the possession of valid work permits, whether identity documents are retained by the employer, and recruitment fee arrangements (including refunded or non-refunded fees and security deposits). | Negligible Risk |
| **7: Principle of FPIC**<br>*Art. 2(40)(g)* | As TTR Group's supply base consists of individually registered smallholder rubber farmers rather than large-scale plantation concessions, FPIC-related risk is assessed primarily through the legality survey by evaluating the existence of unresolved land disputes with Indigenous Peoples or local communities and cross-checking the results against land use rights documentation. | Negligible Risk |
| **8: Tax, Anti-Corruption, Trade & Customs**<br>*Art. 2(40)(h)* | The legality survey assesses indicators of the farmer's ability to comply with applicable tax requirements, including possession of an active tax identification number, payment of relevant taxes, transaction records, issuance of receipts, or documented exemption from tax obligations. | Negligible Risk. |

**Supply Area 2 - Thailand: RAOT Central Markets**

*Risk assessment for this supply area relies on RAOT's own due diligence documentation - including GISTA satellite-based deforestation and protected-area analysis and RAOT's own farmer-level EUDR risk assessment survey (covering labor, land tenure/indigenous-conflict, environmental/pesticide, and consent criteria under Article 10.2/10.4) - cross-validated by TTR Group (invalid-polygon, overlap, and duplicate checks via QGIS) before raw material is merged into TTR Group's traceability system. TTR Group additionally conducted an on-site audit of the Buriram Central Rubber Market Office and two affiliated cooperatives (Non Suwan Rubber Plantation Fund Cooperative Ltd. and Mueang Ubon Ratchathani Rubber Plantation Fund Cooperative Ltd.) on 3-4 November 2025, covering supplier documentation, geolocation/RAOT GIS data, segregation and traceability systems, and field inspection of six smallholder plots. The same 9 legality/deforestation categories apply, as assessed and documented by RAOT and independently reviewed by TTR Group's Sustainability Team on a lot-by-lot basis (SOP 4.1.23).*

| Legality / Deforestation Category | Description of Information & Evidence Obtained and Used to Assess the Risk | Risk Designation |
|---|---|---|
| **'Deforestation-Free' Commodities**<br>*Art. 2(3)(4)(5)(6)(13); Art. 3* | Each registered plot is assessed by RAOT using GISTA (Geo-Informatics and Space Technology Development Agency) satellite-based spatial analysis to determine deforestation-free status and overlap with strict protected areas and restricted-use/reserved forest. RAOT and cooperative officers conduct joint field inspections with farmers, recording GPS coordinates at all plot boundary corners; the finalized geolocation data are uploaded into the RAOT GIS application, which generates polygon boundaries and plot information. This RAOT-administered methodology is used in place of the GFW/Georubber.net-based deforestation analysis applied to Supply Area 1. | Negligible Risk |
| **1: Land Use Rights**<br>*Art. 2(40)(a)* | Each registered farmer provides recognized land title documents or other RAOT-accepted evidence of land use rights for verification as part of the due diligence assessment. | Negligible Risk |
| **2: Environmental Protection**<br>*Art. 2(40)(b)* | Each plot is assessed for environmental compliance, including the environmental impacts of natural rubber cultivation and the use of pesticides and other chemical substances, in accordance with the RAOT Due Diligence Survey. | Negligible Risk |
| **3: Forest-Related Regulations**<br>*Art. 2(40)(c)* | As natural rubber is an agricultural commodity rather than a forest product, forest-related legal status is assessed through RAOT's GISTA-based analysis of protected areas, reserved forests, and deforestation, supported by information collected through the RAOT Due Diligence Survey, rather than through a separate harvesting-specific assessment. | Negligible Risk |
| **4: Third Parties' Rights**<br>*Art. 2(40)(d)* | The RAOT Due Diligence Survey assesses the existence of any unresolved land disputes involving Indigenous Peoples or local communities and verifies the farmer's land use rights documentation as part of the legal compliance assessment. | Negligible Risk |
| **5: Labor Rights**<br>*Art. 2(40)(e)* | The RAOT Due Diligence Survey evaluates labor-related risks, including the use of child labor, the employment of hired and migrant workers, and compliance with applicable legal employment requirements. | Negligible Risk |

| Legality / Deforestation Category | Description of Information & Evidence Obtained and Used to Assess the Risk | Risk Designation |
|---|---|---|
| **6: Human Rights**<br>*Art. 2(40)(f)* | The RAOT Due Diligence Survey assesses labor-related compliance, including the employment of migrant workers and compliance with applicable labor laws and legal employment requirements. | Negligible Risk |
| **7: Principle of FPIC**<br>*Art. 2(40)(g)* | As RAOT's supply base comprises of individually registered smallholder rubber farmers rather than large-scale plantation concessions, the RAOT Due Diligence Survey assesses whether any unresolved land disputes exist with Indigenous Peoples or local communities and verifies the farmer's land use rights documentation as part of the legal compliance assessment. | Negligible Risk |
| **8: Tax, Anti-Corruption, Trade & Customs**<br>*Art. 2(40)(h)* | The RAOT Due Diligence Survey collects information to support the assessment of legal production in accordance with applicable legal requirements relevant to natural rubber production. | Negligible Risk |

## 5. Risk Mitigation Measures Implemented

In addition to the category-specific measures described below, TTR Group implements the following cross-cutting risk mitigation measures across all Supply Areas and product lines:

- **Physical segregation** of EUDR and non-EUDR raw materials throughout collection, transportation, storage, and processing using clear signage, QR-coded lot identification, and a minimum separation distance of one meter or a physical barrier.
- **Theoretical volume control** by comparing the expected yield of each production plot against the established benchmark of 500 kg of wet rubber content per rai per year to identify potential over-reporting. Quantities exceeding the calculated production quota are recorded as non-EUDR.
- **Continuous monitoring** of Global Forest Watch (GFW) fire alerts and tree cover change alerts, with automatic notifications issued to the EUDR team for follow-up verification.
- **Annual field verification**, comprising ground checks of at least 10 plots per vendor per year and annual vendor supply chain audits covering material segregation, documentation, survey validity, staff training, and compliance with labor, land use, environmental, and anti-corruption requirements
- **Periodic performance reviews** of the Due Diligence System, including an internal review of risk mitigation measures and due diligence performance every years, supplemented by periodic independent third-party audits of the supply chain and Due Diligence System.

**Supply Area 1 - Thailand: Registered Smallholder Rubber Plantations**

| Legality / Deforestation Category | Description of Risk Mitigation Measures Taken | Activities Conducted to Verify Effectiveness |
|---|---|---|
| **'Deforestation-Free' Commodities**<br>*Art. 2(3)(4)(5)(6)(13); Art. 3* | Plots identified with tree cover loss are approved upon verification of photographic evidence. Plots overlapping protected areas are not approved until an official government letter confirms authorized agricultural land use. Plots | All registered plots are re-assessed annually using updated satellite imagery. Global Forest Watch (GFW) fire and tree cover change alerts |

| **Legality / Deforestation Category** | **Description of Risk Mitigation Measures Taken** | **Activities Conducted to Verify Effectiveness** |
|---|---|---|
| | overlapping reserved forest areas are approved upon verification of valid land use rights documentation or other official government-issued documentation. Global Forest Watch (GFW) fire and tree cover change alerts trigger field verification, and plot approval status is updated accordingly. | are monitored continuously, and all findings, verification results, and plot status changes are recorded in Georubber.net, providing a complete audit trail. |
| **1: Land Use Rights**<br>*Art. 2(40)(a)* | Plots without valid land use rights documentation or other recognized evidence of land use rights are excluded from EUDR-approved sourcing until satisfactory documentation is obtained. Plots located within protected areas additionally require official confirmation from the relevant government authority verifying authorized agricultural land use, regardless of existing land documentation. | Land use rights documentation is verified during supplier onboarding and cross-checked against the Thai Department of Lands records (landsmaps.dol.go.th). Documentation is re-verified through annual ground checks (minimum 10 plots per vendor per year). |
| **2: Environmental Protection**<br>*Art. 2(40)(b)* | Plots located on peatland, or where protected flora or fauna habitats have been damaged through plantation expansion, are classified as high risk and excluded pending resolution. TTR Group promotes sustainable harvesting and soil management practices, including the use of organic fertilizers, cover cropping, controlled tapping depth, and RAOT-recommended disease-resistant clones, to reduce environmental impacts. | Legality survey responses are verified during ground checks. Approved fertilizer and pesticide reference lists are shared with farmers and cross-checked against declared chemical use. |
| **3: Forest-Related Regulations**<br>*Art. 2(40)(c)* | Plots located within protected areas are not approved unless an official government letter confirms authorized agricultural land use. Plots located within reserved forest areas are approved only upon verification of valid land use rights documentation or other official government-issued documentation. | Forest-related legal status is verified as part of the deforestation-free assessment during plot registration and annual plot reviews. |
| **4: Third Parties' Rights**<br>*Art. 2(40)(d)* | Plots subject to unresolved third-party land disputes are classified as high risk and excluded from EUDR-approved sourcing until the dispute has been resolved. TTR Group's mitigation process requires the vendor or farmer to document the root cause, implement agreed corrective actions within an agreed timeframe, and provide evidence of resolution before EUDR-approved status is granted or reinstated. | Verified during supplier onboarding (legality survey) and through annual ground checks and vendor supply chain audits. |
| **5: Labour Rights**<br>*Art. 2(40)(e)* | Plots or vendors found employing workers below the legal minimum working age, assigning hazardous work to children, or operating an unreported workforce of 10 or more workers are classified as high risk and are required to implement corrective actions before EUDR-approved status is granted or reinstated. Labor | Labor practices are verified through farmer interviews during annual ground checks and reviewed as part of the annual vendor Supply Chain Audit |

| **Legality / Deforestation Category** | **Description of Risk Mitigation Measures Taken** | **Activities Conducted to Verify Effectiveness** |
|---|---|---|
| | practices are further reviewed during the annual Supply Chain Audit. | |
| **6: Human Rights**<br>*Art. 2(40)(f)* | Cases involving confiscation of identity documents, recruitment fees that have not been reimbursed, or the employment of migrant workers without valid work permits are classified as high risk. Corrective action must be implemented before EUDR-approved status is granted or maintained. | Verified through the legality survey during supplier onboarding and reviewed during the annual vendor Supply Chain Audit. |
| **7: Principle of FPIC**<br>*Art. 2(40)(g)* | Any indication of an unresolved land dispute is classified as high risk. The affected plot is excluded from EUDR-approved sourcing until the dispute has been resolved and supporting evidence has been verified in accordance with TTR Group's mitigation process. | Verified during supplier onboarding and annual ground checks through farmer interviews. |
| **8: Tax, Anti-Corruption, Trade & Customs**<br>*Art. 2(40)(h)* | The absence of evidence demonstrating compliance with applicable tax requirements is classified as high risk. Vendors are required to issue receipts to all smallholders and record all EUDR transactions in Georubber.net. | Verified through the legality survey during supplier onboarding and reviewed during the annual vendor Supply Chain Audit. |

**Supply Area 2 - Thailand: RAOT Central Markets**

| **Legality / Deforestation Category** | **Description of Risk Mitigation Measures Taken** | **Activities Conducted to Verify Effectiveness** |
|---|---|---|
| **'Deforestation-Free' Commodities**<br>*Art. 2(3)(4)(5)(6)(13); Art. 3* | RAOT verifies the deforestation-free status of registered plots using GISTA satellite imagery, GPS polygon mapping, and joint field inspections conducted by RAOT and cooperative officers. Plots with unresolved findings remain pending approval until supporting evidence has been verified in accordance with RAOT procedures. | Plot information is reviewed through RAOT's annual reassessment process, supported by updated GISTA satellite imagery, field verification, and continual review of geolocation records maintained within the RAOT GIS platform. TTR Group conducts periodic verification audits of RAOT Central Markets, cooperatives, and selected smallholder plantations to assess the implementation and effectiveness of RAOT's Due Diligence System. |
| **1: Land Use Rights**<br>*Art. 2(40)(a)* | Registered farmers are required to provide valid land use rights documentation or other supporting documentation accepted by RAOT as part of the registration and due diligence process. Plots with incomplete or unverifiable | Land use rights documentation is verified during RAOT farmer registration and periodic reassessments. TTR Group conducts periodic verification audits to assess the |

| **Legality / Deforestation Category** | **Description of Risk Mitigation Measures Taken** | **Activities Conducted to Verify Effectiveness** |
|---|---|---|
| | documentation are not approved until satisfactory evidence has been provided. | implementation of RAOT's land use rights verification process. |
| **2: Environmental Protection** *Art. 2(40)(b)* | Environmental risks are assessed through the RAOT Due Diligence Survey, including environmental impacts associated with natural rubber cultivation and the use of pesticides and other chemical substances. Identified non-conformities require corrective action before approval. | Environmental information is verified through RAOT field inspections and periodic reassessments. TTR Group conducts periodic verification audits to evaluate the implementation of environmental due diligence requirements. |
| **3: Forest-Related Regulations** *Art. 2(40)(c)* | Forest-related legal status is assessed through RAOT's GISTA spatial analysis of protected areas, reserved forests, and deforestation. Identified non-conformities are addressed in accordance with RAOT procedures before approval. | Forest-related legal status is verified through RAOT's GIS platform during plot registration and periodic reassessments, supported by field inspections. TTR Group conducts periodic verification audits of RAOT's forest-related due diligence procedures. |
| **4: Third Parties' Rights** *Art. 2(40)(d)* | The RAOT Due Diligence Survey assesses the existence of unresolved land disputes involving Indigenous Peoples or local communities. Plots with unresolved disputes are not approved until the dispute has been resolved and verified in accordance with RAOT procedures. | Information is verified during RAOT farmer registration, field inspections, and periodic reassessments. TTR Group conducts periodic verification audits to assess the implementation of RAOT's third-party rights assessment process. |
| **5: Labor Rights** *Art. 2(40)(e)* | The RAOT Due Diligence Survey assesses labor-related risks, including child labor, the employment of hired and migrant workers, and compliance with applicable legal employment requirements. Identified non-conformities require corrective action before approval. | Labor-related information is verified through the RAOT Due Diligence Survey and field inspections. TTR Group conducts periodic verification audits to assess the implementation of RAOT's labor due diligence procedures. |
| **6: Human Rights** *Art. 2(40)(f)* | The RAOT Due Diligence Survey assesses labor practices relevant to human rights, including the employment of migrant workers and compliance with applicable legal employment requirements. Identified non-conformities require corrective action before approval. | Human rights-related information is verified through RAOT field inspections and periodic reassessments. TTR Group conducts periodic verification audits to evaluate the implementation of RAOT's human rights due diligence procedures. |
| **7: Principle of FPIC** *Art. 2(40)(g)* | The RAOT Due Diligence Survey assesses whether unresolved land disputes exist with Indigenous Peoples or local communities. Plots | Information is verified during RAOT farmer registration, field inspections, and periodic |

| Legality / Deforestation Category | Description of Risk Mitigation Measures Taken | Activities Conducted to Verify Effectiveness |
|---|---|---|
| | with unresolved disputes are not approved until the dispute has been resolved and verified in accordance with RAOT procedures. | reassessments. TTR Group conducts periodic verification audits to assess the implementation of RAOT's FPIC-related due diligence procedures. |
| **8: Tax, Anti-Corruption, Trade & Customs** *Art. 2(40)(h)* | RAOT supports legal production through farmer registration, transaction traceability, production quota controls, and the collection of information relevant to compliance with applicable legal requirements. | Transaction traceability and legal compliance controls are implemented through RAOT's due diligence process. TTR Group conducts periodic verification audits to assess the implementation and effectiveness of these controls. |

## 6. External Technical Expertise to Support Our Due Diligence Efforts

| Name | Qualification | Scope of Service | Audit Date |
|---|---|---|---|
| Preferred by Nature | Independent auditor | Independent verification/assessment of due diligence system | 24 - 31 May 2026 |
| Bureau Veritas | Independent verification body | Independent verification/assessment of due diligence system | 15 - 16 Jan 2025 |

## 7. Stakeholder Consultation Processes

As part of its Responsible Sourcing Policy and Due Diligence System (DDS), TTR Group engages with key stakeholders throughout its natural rubber supply chain to support the effective implementation and continual improvement of its due diligence processes. Stakeholder engagement includes registered smallholder farmers, plot owners, vendors and collectors, TTR Group field and sustainability personnel, and, for Supply Area 2, the Rubber Authority of Thailand (RAOT), RAOT Central Markets, and participating rubber cooperatives.

Stakeholder engagement activities include EUDR awareness and training programs, supplier onboarding, legality surveys, plot registration and GPS data collection with PDPA consent, field inspections, annual ground verification, periodic verification audits, and supply chain risk assessments. During supply chain risk assessments, TTR Group also consults stakeholders to identify their needs and challenges, including training requirements, sustainable farming and rubber tapping practices, financial support, access to market information, pricing updates, and potential capacity-building programs. Feedback received is used to strengthen TTR Group's Due Diligence System, supplier engagement, and the development of targeted training and capacity-building initiatives.

| Supply Area Code | Supply Area | Stakeholder Groups Invited | Summary of Comments Received | How Comments Were Taken Into Account |
|---|---|---|---|---|
| 1 | Thailand - Smallholder Rubber Plantations | Registered smallholder farmers, plot owners, vendors/collectors, and TTR Group field and sustainability staff | Feedback received during supplier onboarding, supply chain risk assessments, field visits, and annual ground verification included requests for additional EUDR training, guidance on sustainable farming and rubber tapping techniques, financial support, market pricing updates, and capacity-building programm to improve productivity and compliance. | TTR Group uses the feedback to develop supplier training program, technical field support, stakeholder communications, and targeted capacity-building initiatives, while continuously improving its Due Diligence System and supplier engagement activities. |
| 2 | RAOT Head Office, Buriram Central Rubber Market Office, Non Suwan Rubber Plantation Fund Cooperative Ltd., and Mueang Ubon Ratchathani Rubber Plantation Fund Cooperative Ltd. | RAOT head office; Buriram Central Rubber Market Office; Non Suwan Rubber Plantation Fund Cooperative Ltd.; Mueang Ubon Ratchathani Rubber Plantation Fund Cooperative Ltd. | During the joint verification audit conducted on **3–4 November 2025**, TTR Group, RAOT, and the participating cooperatives exchanged knowledge and good practices on sustainable rubber production. Discussions included agroforestry, intercropping rubber with economic crops, cover cropping to improve soil health and biodiversity, integrated aquaculture systems, renewable energy applications, water management, and approaches to strengthening farmers' livelihoods through diversified income sources. | The knowledge shared during the verification audit has been incorporated into TTR Group's continual improvement process and will be considered in future supplier engagement, training, and capacity-building programs. TTR Group will continue collaborating with RAOT and participating cooperatives to promote sustainable agricultural practices and strengthen the resilience of the natural rubber supply chain. |

## 8. Complaints Procedure

TTR Group encourages all stakeholders to submit suggestions, comments, or complaints relating to its Responsible Sourcing Policy, Due Diligence System (DDS), or the sourcing of natural rubber.

**Contact Details**

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TTR Group is committed to acknowledging receipt of stakeholder feedback promptly and providing a substantive response within **two weeks** of receipt. All complaints are recorded in the Company's grievance register and assigned to the Sustainability Officer for investigation. Where appropriate, corrective and preventive actions are implemented in accordance with TTR Group's established root cause analysis and corrective action procedures, consistent with the process applied to supplier non-conformities.