



Whistleblowing and Complaint-making Policy

บริษัท เอ็น.ดี. รับเบอร์ จำกัด (มหาชน)

N.D. Rubber Public Company Limited

Whistleblowing and Complaint-making Policy

N.D. Rubber Public Company Limited (“NDR” or “the Company”) places importance on whistleblowing by providing opportunities for all group of stakeholders, both internal and external, to contact or voice their concerns to the Company regarding controversial issues; doubts on unlawful or unethical conducts; infringement of rights; incorrect financial report; or defective internal audit system. The whistleblowing contact channels are reporting steps are as follows:

1. Whistleblowing and complaint channels

Both internal and external stakeholders can report the issues and complaints to the Company via the following channels:

- **Chairman of the Audit Committee** (An external director who is independent)

E-mail: auditcom@ndrubber.co.th

Postal Mail: **Chairman of the Audit Committee**

N.D. Rubber Public Company Limited

129 Moo 3 Nongchak-Phanasnikom Road, Nongeiroom, Banbueng, Chonburi 20220

- **Company Secretary**

E-mail: watcharaporn.wk@ndrubber.co.th

Postal Mail: **Company Secretary**

N.D. Rubber Public Company Limited

129 Moo 3 Nongchak-Phanasnikom Road, Nongeiroom, Banbueng, Chonburi 20220

Phone: +6638-160-707 # 112

- **General Manager of Human Resources and Administration**

E-mail: thitikarn@ndrubber.co.th

Postal Mail: **General Manager of Human Resources and Administration**

N.D. Rubber Public Company Limited

129 Moo 3 Nongchak-Phanasnikom Road, Nongeiroom, Banbueng, Chonburi 20220

Phone: +6638-160-707 # 130

2. Whistleblowing information and complaint handling process

2.1 Upon receipt of whistleblowing information or complaints, the recipients of the information via various channels are required to respond to the whistleblower that his/her case has already been received (in case

that the whistleblowers reveal their identity). The recipients are also required to gather relevant information and submit it to the assigned functions for further actions.

- 2.2 The assigned functions conduct investigations and gathering facts as soon as possible, performing their duties with fairness, regardless of the position, duration of work or any importance of the whistleblower to the Company.
- 2.3 Once the fact-finding is carried out, the assigned functions shall prepare an investigative report and propose appropriate management actions to prevent reoccurrence in each matter to the Audit Committee, Managing Director, General Manager of Finance and Accounting, General Manager of Human Resources and Administration or any related person as the case maybe.
- 2.4 Regarding the aforementioned process, the measures can stop the violation or non-compliance with the Business Code of Conduct while alleviating damage incurred to the impacted persons considering total damage into account. In addition, necessary measures need to be set up to protect the whistleblower who reports such misconducts or complaints and the persons who provide cooperation during fact-finding process.
- 2.5 The Audit Committee or Managing Director reports to the Board of Directors for acknowledgement and reports on the results of the whistleblower who submitted such complaints (in case that the whistleblowers reveal their identity).

3. Measures to protect whistleblowers or the persons who submit complaints or the persons who provide cooperation during fact-finding process

- 3.1 The whistleblowers or the persons who submit complaints or the person who provide cooperation during the fact-finding process can choose not to disclose their name if such disclosure may cause unsafely or damage. In case, they choose to reveal their name, it will facilitate the organization to report the progress of the case or give factual information or alleviate damage more conveniently and faster.
- 3.2 The Company will not disclose name-surname, address, photograph, or any other information which may identify the whistleblowers or those who provide cooperation during the fact-finding process.
- 3.3 The recipients of the complaints must keep relevant information confidential and will disclose it as necessary, taking into considering the safety and damage of the whistleblower or those who provide cooperation during the fact-finding process, the source of the information or related persons. If it is likely to cause damage or jeopardize damage or insecurity, appropriate protection measures must be implemented.
- 3.4 The victims' damage will be alleviated through appropriate and fair process.

- 3.5 The Company will provide protection and prohibit employees or executives from terminating, suspending, disciplinary action or threatening to take action against the whistleblower from providing information about misconduct or corruption.
- 3.6 In case the whistleblowers providing information about wrongdoing or fraud with good faith intent, although the Company has later conducted an investigation and found that there are no wrongdoing as complained, the Company will not take any punitive action against whistleblowers.

4. Penalties

- 4.1 In case, the whistleblower is found to have broken the law or violated good corporate governance, the Company will take penalties in accordance with the Company's work regulations, which carry penalties ranging from verbal or written warning, suspension or dismissal. The management should consider disciplinary action against the offender within 30 days after receiving the results of the investigation.
- 4.2 If the results of investigation are found to be unfounded as complained by the whistleblower and have acted with malicious intent or intentionally causing harmful consequences or providing fake information, the Company will consider punishing who intentionally report fake information. Penalties ranging from verbal or written warning, suspension or dismissal.

The Whistleblowing and Complaint-making Policy, is considered and approved by the Board of Directors Meeting No. 4/2023 on 10 November 2023.

A handwritten signature in blue ink, appearing to be 'P. Swadwan', written over a horizontal line.

(Mr. Pongsak Swadwan)

**Chairman of the Board of Director
N.D. Rubber Public Company Limited**