



Anti-Corruption Policy

บริษัท เอ็น.ดี.รับเบอร์ จำกัด (มหาชน)

N.D. Rubber Public Company Limited

Anti-Corruption Policy

N.D. Rubber Public Company Limited (“NDR” or “the Company”) determines in honest, transparent and just business practice according to good corporate principle which be intolerant to both direct and indirect corruptions in any forms. The Company determines directors, executives and employees to seriously comply with the policy of Anti-Corruption and the Company has intent to commit in the Organic Act on Counter Corruption B.E. 2542 (1999), Section 123/5 of the Office of the National Anti-Corruption Commission which prescribes and offence of bribery of state officials or the Amendment Act in the future (if any). Therefore, the Company defines practical guidelines on anti-corruption, detailed as follows:

1. Definition

“**Corruption**” refers to bribery of any type by means of offering, agreeing, giving, promising, claiming or accepting (monetary form/asset) or other undesirable benefit, to government officials, government agencies, private agencies, partners, customers, and all Interested Parties, either directly or indirectly, for such persons to perform or refrain from performing of duty, so as to acquire, maintain the business, or recommend any business to the Company particularly, or to acquire or maintain any other undesirable benefit to the business, unless it is allowed by the law, rules, announcement, regulations, local customs, conventionality or business tradition.

“**Political Contributions**” refers to a contribution, financial or in-kind, to support a political cause. It can be a legitimate way to support by providing financial and other support to assist political parties such as offering assets and money as well as gifts, donate to political campaign, support electioneer, and benefit political parties in any way. This excludes employees’ individual rights to participate in any political activities on his/her own time and expenses.

“**Conflict of Interest**” means any actions that may involve personal interest or the related person influences decision-making.

“**Giving and Receiving of Charitable Contributions**” means giving and receiving financial help or other forms as a part of social responsibility activity. This includes the publicity and promotion of a good image of the Company without business benefits in return.

“**Giving and Receiving of Sponsorships**” means giving and receiving help as a part of business publicity, which varies from the charity donation. Such support is in various forms, i.e., cultural, art, and educational activity support.

“**Gift voucher, banquet fee, reception fee and other expenses**” means the Company’s operating expenses to build a good relation, or in some occasion regarded as a social manner. The cost is allocated for payment of any monetary value, including the items used as cash and an object in exchange for a product or service. Such expenses could be interpreted as a bribe if provided as an incentive for a government officer to commit a wrongful act.

“**Facilitation Payment**” means a small sum of expenses informally provided to government officers and to ensure that such government officer will follow the procedures or to accelerate rapid proceed without discretion of officials and such act is under a due duty of the government officials, and is deemed as the legitimate right of a juristic person, for instance, obtaining a license, certificate, and public services.

“**Hiring of Government Employees**” means when the government officers work in private entities, performing duties and receiving compensation or any other benefits directly and indirectly. The relation may be as a full-time employee or temporary contracted work. The hiring duration is uncertain any may cause risk of corruption, conflict of interest.

“**Government Employees**” means government employee, an employee of the government authorities, public organization, state enterprises, politicians having benefits to the Company, its subsidiaries, or the Company’s joint venture. This excludes the retired employees, their family or relatives.

2. Form of Corruption

Any actions that can cause corruption risk i.e. expenses on political, philanthropy donation, support, gift, hospitality, hiring of governance employees, facilitation fee and others.

3. Acceptable Guidelines of Practice

- 3.1 The Company supports not asking, not receiving, not paying and not doing business with any person or entity relating to corruption.
- 3.2 The Company’s directors, executives and employees shall not commit or involve in the corruption; in both directly and indirectly forms of providing and accepting on personal, family, friend or acquaintance and

comply with the Anti-Corruption Policy, Corporate Governance, Business Code of Conduct, regulations and relevant articles.

- 3.3 The Company's directors, executives and employees shall perform with care in receiving and providing gift, assets or other benefit including hospitality, facilitation fee and other expenses. However, providing and receiving gifts and hospitality must have business or custom objective. The value of such gifts and hospitality must be appropriate and does not affect practical decision or Company operation.
- 3.4 Philanthropy donations and supports by the Company shall be transparent and lawful which the Company shall have review, approval, and audit processes. Document evidence must be precise and comply with the Company's regulations. Such process can ensure that the gifts and hospitality are not used to cover the Corruptions.
- 3.5 The Company operates its business on politically neutral basis without participation in or attention to any political party or political authority or taking the Company's fund or resources to support, directly or indirectly, any political party or politician.
- 3.6 For hiring government employees to undertake the position as a director, executive, officer and employee of the Company, such hiring consists of recruitment procedures, approval and compensation settlement, including control procedures to ensure that the employment will not become a consideration for any benefits, providing interest to the Company, its subsidiaries, and joint ventures. The unfaithful hiring could induce the corporate image and reliability and honesty. It may also lead to a risk to corruption.
- 3.7 The Company's directors, executives and employees may neither offer nor take any bride during business operation with partners, contractual parties, Government Sector agencies, or any agency dealing with the Company; procurement shall be carried out with transparency and in accordance with the related laws.
- 3.8 The Company shall have human resource management system that reflects anti-corruption commitment. The Company will not demote, punish or affect the person who decline the corruptions practices although such decline cause lost in business opportunities.
- 3.9 The Company shall establish documentation readiness and record keeping procedures for ensuring and auditing accuracy of the financial report and relevant procedures that no account has been missed, unexplainable or false.
- 3.10 The Company establish procedures to ensure that the internal controls of accounting and information storage have been internally audited. Suc procedures shall ensure effectiveness of the anti-corruption measures and the financial report has enough evidences for audit.
- 3.11 The Company shall provide communication and training that genuinely educate the Company's directors, executives and employees, especially those whose duties related to the transactions are at risk of corruption on the anti-corruption measures and practices, and punishment for violation.

- 3.12 The Company's directors, executives and employees shall neither relinquish nor tolerate potential violation of the anti-corruption measures. The Company shall establish whistle blowing channel and protection for the whistleblower. Such channel shall provide suggestions on the anti-corruption measures for personnel.
- 3.13 The Company communicates the Anti-Corruption Policy and practice to subsidiaries, joint venture companies, associated companies and other controlled companies; business partners, and stakeholders including general public through various communication channels for notification and implementation of the Anti-Corruption Policy.
- 3.14 Internal Audit Department can report urgent violation to the CEO, Audit Committee and The Board of Directors respectively.
- 3.15 Corruption risk assessment shall be performed all on the entire organization regularly.

The Anti-Corruption Policy, is considered and approved by the Board of Directors Meeting No. 4/2022 on 10 November 2022.

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