



## Anti-corruption Policy (Amendment)

Sri Trang Gloves (Thailand) Public Company Limited (the 'Company') and its subsidiaries conduct its business with integrity by adhering to the principle of corporate social responsibility and respect for all stakeholders based on the good corporate governance and its Code of Business Ethics including policies and guidelines on treatment of stakeholders. The Company is committed and aspired to combat all types of corruption.

To ensure that the Company puts in place a policy which sets out appropriate accountability, practices and regulations of actions to be taken to prevent corruption in all business activities of the Company and to ensure that all business decisions and operations which are exposed to corruption risks are treated and implemented with prudence, the Company prepared this 'Anti-corruption Policy' as a written guideline on clear business practices and corporate development towards sustainability.

### Definition of Corruption under the Anti-corruption Policy

Corruption is defined as all types of bribery given either directly or indirectly by way of offering, agreeing, giving, promising to give, demanding or accepting money, assets, or such other benefits which are inappropriate to or from the government officers, government agencies, private sectors, or any person charged with duties so that such person could take an action or omit any duties with the aim to acquire, retain the business, or introduce business to any particular company or to achieve or retain any commercially improper benefits. Exception shall be applied in cases that laws, regulation, notifications rules, custom, or tradition allow to proceed.

### Anti-corruption Policy

The Company's directors, executives and employees are prohibited from engaging in or accepting all forms of corruption both directly and indirectly. Such prohibitions shall extend to business transactions in all countries and all relevant agencies. There shall be a regular monitoring of compliance with this policy and a revision to practices and requirements to ensure that the policy is in line with the changes to business, rules, regulations and requirements of the law.

### Duties and responsibilities

1. The Company's Board of Directors has the duty to devise policies and put in place an efficient anti-corruption system to ensure that the management is aware of and recognizes the importance of anti-corruption such that the anti-corruption is enshrined as the corporate culture of the Company.
2. The Audit Committee is charged with the duty and responsibility to carry out audit of financial reporting system, accounting system and internal control and internal audit including risk management system to ensure that they meet international standards, are strict, appropriate, up-to-date and efficient.

3. Chief Executive Officer, the management and executives shall have the duty and responsibility to put in place and promote anti-corruption system and communicate the same to all employees and all relevant parties, and shall review the suitability of systems and measures to ensure that they are in line with the changes to business, rules, regulations and requirements of the law.
4. Director of the Audit Office shall have the duty and responsibility to audit and review compliance with policies, guidelines, Table of Authority, rules of practices and laws including requirements of relevant regulatory authorities to ensure that the control system is appropriate and sufficient to address possible anti-corruption risks and to report the same to the Audit Committee.

#### **Guidelines**

1. The directors, executives and all levels of employees of the Company shall comply with the Anti-corruption Policy and Code of Business Ethics by refraining from both direct and indirect involvement in the corruption.
2. The Company's employees shall not neglect or ignore any incident of possible corruption relating to the Company that they have witnessed. Any incident of corruption shall be reported to relevant supervisors of the employee who witnesses the corruption or to any responsible person. The employees shall collaborate with the validation of facts. The employees shall address through available channel any questions that they may have to the supervisors or designated persons who have the responsibility.
3. The Company will ensure that the employees who refrain from or report on matters of corruption relating to the Company, or persons providing collaboration regarding the report on corruption will be treated with fairness and are protected using a protection measure, even if such action will cause the Company to lose its business opportunity.
4. Any person who are involved in the corruption breaches the Anti-corruption Policy and Code of Business Ethics of the Company and shall be liable for disciplinary actions in accordance with the rules of the Company, and may also be liable for penalties under relevant law if such act of corruption is in violation of the law.
5. The Company recognizes the importance of spreading, educating, and illustrating persons whose duties relate to the Company or who may have any impact on the Company about the compliance with this Anti-corruption Policy.
6. The Company strives to create and maintain corporate culture of non-tolerance for corruptions in in dealings with both government and private sectors.
7. The Company puts in place a regulation on the drawing of expenses by providing limits on the amount of expenses to be drawn, Table of Authority, objectives of the draw and recipients. Clear documents shall be provided as an evidence to support any draw of expenses. The requirements are aimed at preventing any political aid and at ensuring that donations are made for the purpose of charity and not corruption, and that financial support for business is not used as an excuse for corruption. All

hospitality, gifts and expenses are in accordance with the policy which are subject to the audit of the internal audit of the Company.

### **Requirements**

1. This Anti-corruption Policy shall extend to human resources management including the recruitment or selection of personnel, promotions, trainings, evaluation of performance of employees and remunerations. All levels of supervisors are required to communicate with and ensure understanding of employees with respect to business activities that are their responsibility and to monitor and ensure that the compliance is efficient.
2. All actions taken in accordance with this Anti-corruption Policy shall be in line with the guidelines determined by the Company, including policies and practice of treatment of all stakeholders including rules, regulations and work manuals of the Company and such other guidelines to be provided by the Company.
3. For the clarity of matters which are exposed to high corruption risks, the directors of the Company, executives and all levels of employees of the Company shall have particular precaution in the following matters:
  - 3.1 Gifts, hospitality and expenses  
Giving or accepting gifts or hospitality shall be in accordance with the guidelines provided by the Company.
  - 3.2 Donations or financial support  
Giving or accepting donation or financial support shall be transparent and lawful and it shall be ensured that donations or financial supports are not used as an excuse for bribery.
  - 3.3 Business relationship and procurement with the government sector  
It is prohibited to give or accept bribery in all types of business transactions of the Company. Contact with the government sector shall be made with transparency, integrity and shall be in accordance with relevant laws.

### **Reporting**

1. Reporting and giving sources of information about corruption is the duty of all levels of personnel within the Company. Reporting may be made anonymously using the following channels:
  - 1) By postage  
Contact Person: The Company Secretary  
Address: Park Ventures Ecoplex, Unit 1701, 1707-1712, 17<sup>th</sup> Floor  
No. 57 Witthayu Road, Lumpini District, Pathum Wan Sub-district, Bangkok  
10330

Contact Person: The Secretary to the Audit Committee  
Address: 110 Kanjanavanich Road, Pah Tong Sub-district, Hat Yai District, Songkhla Province 90230

2) By email

Contact Person: The Company Secretary or the Secretary to the Audit Committee  
Email Address: [stgt\\_corporatesecretary@sritranggroup.com](mailto:stgt_corporatesecretary@sritranggroup.com) or [anticorruption@sritranggroup.com](mailto:anticorruption@sritranggroup.com)

3) By telephone:

Contact Person: The Company Secretary  
Telephone no: +66 2207 4500 ext. 1406  
Contact Person: The Secretary to the Audit Committee  
Telephone no: +6674344663 ext. 331

4) Complaint Box at the factory and branch office of the Company

2. All directors, executives and employees of the Company have the duty to collaborate with an investigation into corruptions.

#### Investigation Process and Penalty

1. Once receiving any complaints, the Human Resource Department will screen and conduct the primary investigation. If the Human Resources Department considers and finds that such complaints have sufficient and reliable information, the investigation process shall commence by proposing an Investigation Committee to the Chief Executive Officer for approval and proceeding with the investigation process.

Investigation Committee shall consist of at least the members at the highest level from Human Resource Department, Legal Department, and Internal Audit Department.

2. If the Investigation Committee finds an information or evidence to prove the accused has made a real fraud, the Company shall inform the accused to acknowledge such accusation and grant the right to prove themselves by submitting the additional information or evidence.
3. If the accused has made a real fraud, that act is considered a violation on the Anti-corruption policy and Code of conduct of the Company. It must be considered for the disciplinary action of the Company and if the act is illegal, the offender may be punished by law as well.

The Anti-corruption Policy shall apply to the subsidiaries, associated companies, other companies which the Company has the controlling power, and business representatives. The Board of Directors considered and approved the amendment of this policy in the Board of Directors' meeting No. 7/2021, which was held on 10 August 2021. The policy shall come into force as from 10 August 2021.



(Prof. Dr. Weerakorn Ongsakul)

Chairman

Sri Trang Gloves (Thailand) Public Company Limited