

## **Announcement of Sri Trang Gloves (Thailand) Public Company Limited**

**No. 13/2021 ( Revised edition )**

### **Anti-Corruption Policy Guideline**

#### **Introduction**

Sri Trang Gloves (Thailand) Public Company Limited (the "Company"), a listed company under supervision of the Stock Exchange of Thailand and the Securities and Exchange Commission, has strictly and continuously adhered to business principles by emphasizing on integrity, transparency and fairness, which are important principles that the Company has always adhered and implemented. Therefore, the Company wishes to participate in the Thai Private Sector Collective Action Coalition Against Corruption (CAC) in order to develop the collaboration with other private sector organizations and promote the business operation by preventing and resolving corruption problems in all relevant parts of business operations to support fair business competition environment. For the aforementioned reasons, the Company has created the guideline on the Anti-Corruption Policy as a guideline for the Company's personnel and related person of the Company's business to study, understand and strictly adhered to.

#### **1. Definition**

As used in this Guideline, the following terms shall have the meanings set forth below:

“The Company” means Sri Trang Gloves (Thailand) Public Company Limited

“Affiliates” means the subsidiaries of Sri Trang Gloves (Thailand) Public Company Limited.

“The Company’s Personnel” means Directors, employees, and authorized persons of the Company and its Affiliates.

“Related Persons to the Company’ Business” means persons or juristic persons related to the Company's or its Affiliates' business, e.g. business partners or associates, contractors, agencies, and brokers.

“Employees” means the employees of Sri Trang Gloves (Thailand) Public Company Limited and the Affiliates.

“Corruption” means 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 in 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 are not prohibited under laws, regulation, notifications or rules.

## 2. Vital Role of the Practical Guideline for Corporate Culture

The Company has a policy on business conducts emphatically focuses on transparency, fairness, and anti-corruptions in all forms, both inside and outside the organization, in conformity with the principles of laws, morals, and good corporate governance. For the effectiveness of this guideline, the Company has used communication channels within the organization to create accurate knowledge, understanding and raise awareness in this matter to the Company's personnel and the related persons, which will lead to the creation of corporate culture that opposes all aspects of corruptions. Such corporate culture will serve as a robust foundation crucial to sustainable business organization developments going forward.

## 3. Practical Guideline on Prevention and Anti-Corruption

3.1 The directors, executives and all levels of employees of the Company shall comply with the Anti-corruption Policy and Code of Business Conduct by refraining from both direct and indirect involvement in the corruption.

3.2 The Company's employees shall not neglect or ignore any incident of possible corruption related to the Company that they have seen. Any incident of corruption shall be reported to relevant supervisors or responsible persons. The employees shall also collaborate with the investigation. If the employees concern or have any questions, they may have to consult with the supervisors or designated persons through various whistleblowing channels as determined.

3.3 The Company will treat with fairness and protect to the employees who refuse or report on any corruption related to the Company, even if such matter will cause the Company to lose business

opportunity. The Company will use the protection measure for whistleblower or persons who collaborate on reporting the corruption matters as specified in article 6.

3.4 Any person who is involved in the corruption which breaches the Code of Business Conduct of the Company shall be liable for disciplinary actions in accordance with the regulation of the Company, also, be liable for penalties under relevant law if such act of corruption is in violation of the law.

3.5 The Company recognizes the importance of publishing, educating, and illustrating persons whose duties relate to the Company or who may have any impact on the Company regarding the compliance with this Anti-corruption Policy.

3.6 The Company strives to create and maintain corporate culture in which any corruptions dealings with both government agencies and private sectors are unacceptable.

3.7 The Company provides a disbursement regulation by specify limits on the amount of expenses, table of authority, payment objectives, and recipients, which have to be accompanied with clear documentary evidence. The requirements are aimed at preventing any political support as well as to ensure that any donations are made for the purpose of charity and the financial support for business is not excuse for corruption. Also, any hospitality expenses, gifts, and other expenses have to be in accordance with the Company's policy which are subject to be in audit process of the Internal Audit Department of the Company.

#### 4. The Persons related to the Audit and Corporate Governance

4.1 The Board of Directors have the duty and responsibility to set up policies and supervise an efficient anti-corruption system to ensure that the management team aware and recognizes the importance of anti-corruption as well as cultivate as the corporate culture of the Company.

4.2 The Audit Committee is in charged with the duty and responsibility to audit the financial and accounting reporting system, internal control system, internal audit system, and risk management system to ensure that it was meet the international standards strictly, appropriate, up-to-date, and efficient.

4.3 Chief Executive Officer, management team, and executives shall have the duty and responsibility to put in place and promote anti-corruption system and communicate the policy to all employees and all related persons, as well as review the suitability of systems and measures to ensure that they are in line with the changes of business, rules, regulations and requirements of the law.

4.4 Chief Internal Audit Officer shall have the duty and responsibility to audit and review compliance with policies, guidelines, table of authority, rules, regulation, 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 report to the Audit Committee.

## 5. Related Anti-Corruption Guideline

### 5.1 Hospitality and Entertainment Expenses

As guidelines on Hospitality and Entertainment Expenses complies with the Company's Regulation No. 17/2562 regarding the reimbursement of the hospitality and entertainment Expenses, dated on 1 January 2020.

### 5.2 Receiving gifts, assets, or any other benefits

As guidelines for accepting gifts, assets, or any other benefit complies with the Company's Regulation No. 12/2562 regarding Good Practices for Receiving Gifts, Assets. or any Other Benefits, dated on 21 August 2019.

### 5.3 Charitable Donations or Supports to Other Agencies or Organizations

"Donation" means an offering money or valuable items to agencies or organizations fundamentally operated for benefits of the public. The purpose of donation is for alleviating hardship of ordinary people, making a contribution for a religious cause, and supporting other activities or projects beneficial to the public.

"Support" means an offering money or valuable items to agencies or organizations in order to promote business and publicize business activities of the Company or its Affiliates in order to enhance its corporate image.

## Guideline

(1) Notwithstanding the nature of donations being an activity for the benefits of the public, transparency and legal compliance are required in making donations, that is, the objective of which must be clearly identified and approved by the Company (or its Affiliates) in accordance with its procedures with all relevant financial evidences fully and properly furnished.

(2) To provide support to agencies or organizations in order to promote business and publicize business activities of the Company in order to enhance its corporate image, it must be conducted with transparency in full compliance with the law. In doing so, the objective of providing the support must be clearly identified and approved by the Company (or its Affiliates) in accordance with its procedures with all relevant financial evidences fully and properly furnished.

### 5.4 Guideline on Political Contributions

“Political Contributions” means the provision of support to political parties in various forms such as contributions or donations of money, valuable items, gifts, holding a reception, or other forms of support with financial value. It also includes indirect assistance such as advertisement to promote a political party as well as participation in a political rally in order to gain business advantages.

Guidelines for Political Participation in accordance with the Company's announcement No. 03/2563 Re: Political Participation Policies and Practices, dated on 25 February 2020.

### 5.5 Guideline on Facilitation Fee

“Facilitation Fee” means any payment, in a forms of money or other non-monetary benefits, made to government officers on an informal basis as incentive to facilitate and complete some legal process related to the business of the Company or its Affiliates expeditiously or without interruption.

## Guideline

The Company and its Affiliates conduct their business with transparency and perform in compliance with the law. Hence, no facilitation fee is allowed whatsoever as it might lead to corruption.



## 5.6 Guideline on Employment of Government officers

“Government Officers” means all types of government officers, political government officers, individuals appointed to be in any position of the Constitutional Independent Organization as well as the regular employees and temporary employees of government agencies.

“Employ” means employment under the Civil and Commercial Code.

### Guideline

The Company and its Affiliates have no policy to employ the government officers as our employees.

## 5.7 Guideline on Assets or Other Benefits

As described in article 5.1-5.5, there are mere practical guidelines on certain issue. If the Company’s personnel or related persons have seen any act of corruption which was not specified herein, please consult with Human Resource Department of the Company to determine an appropriate course of action.

## 6. Corruption Inspection Measures

### Scope of Whistleblowing

All executives, employees, and other stakeholders of the Company can report any incidents that they have seen, aware, or reasonably believed that there is violated or breached policies, rules and regulations, the laws, the principle of good corporate governance, the code of business conduct, or other regulations of the Company that cause damage to both property and reputation of the Company. In case that the employees or officers of the Company have seen or aware of the incidents, they should consult with their supervisor as priority or directly report to the responsible department, or Company Secretary, or Secretary to the Audit Committee as appropriate.

### Protection for Whistleblowers, Witnesses, and Related Persons

To protect the rights of whistleblowers who have a good faith, the Company, by designated persons, will keep the information of the whistleblowers and persons who giving information confidential. The whistleblowers will be protected appropriately, i.e. there will not be changing in the nature of work, workplace, or position, as well as there will not be any threaten, termination of employment, or such other unfair treatment against the whistleblowers until all processes are completed in accordance with this policy, even if such action will cause the Company lost in business opportunities.

Related persons, who were informed of the complaints or related information, have to keep such complaints and information confidential and should not disclosed this matter to others, unless it is required to be disclosed as acquire by the law. If there is any intentional disclosure of information, the Company will be imposed sanctions in accordance with the regulations of the Company and/or commence legal proceedings, as the case may be.

#### Channels for Whistleblowing

Complaints and whistleblowing of corruption are the duties of the Company's personnel at all levels. which can report corruption clues anonymously through the following methods and channels:

##### 1. Postal Mail:

Contact Person: Company Secretary

Address: Park Ventures Ecoplex 17<sup>th</sup> Floor, Unit No. 1701, 1707-12 No. 57 Wireless Road,  
Lumpini, Pathumwan Bangkok 10330

Contact Person: Secretary to the Audit Committee

Address: 110 Kanjanavanit Road, Pahtong, Hatyai, Songkhla 90230

##### 2. Email:

Contact Person: Company Secretary or 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. Telephone:

Contact Person: Company Secretary



Contact: +66 2207 4500 ext. 1406

Contact Person: Secretary to the Audit Committee

Contact: +66 7434 4663 ext. 331

#### 4. Complaint box at the Company factories and branches office

#### Persons involved in the whistleblowing process include:

1. Whistleblowers including those who make reports via whistleblowing channels provided by the Company;
2. Whistleblowing Coordinators including the Company Secretary and Secretary to the Audit Committee who is responsible for the admission of the matters and first point of data collection including summary of results of the procedure and for the reporting of results of the complaint handling and sanctions to the whistleblowers .
3. Whistleblowing Monitor including Human Resources Department and the direct supervisor of the persons against whom the whistleblowing reports are made;
4. Persons in charge of disciplinary matters including Human Resources Department;
5. Chief Executive Officer who is the top-level executive of the Company.

#### Investigation Procedures and Penalties

1. When the Company received complaints and clues regarding corruption, the whistleblowing coordinators must register for that complaints by specify the name of the whistleblower, date, person involved, complaint incident, and other related information as well as set a specific date in order to update the progress to the whistleblower for acknowledgement. The whistleblowing coordinator sends the complaint information to the Human Resources Department in order to investigate the facts and continue proceed in accordance with the authority.



2. 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.

3. If the investigative committee has examined and found that there is no any information or convincing evidence that the accused was actually committed the fraud, then close the complaint and send a copy of the matter to the whistleblowing coordinator for acknowledgement.

4. 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.

5. 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.

6. The whistleblowing coordinator shall summarize the complaint report propose to the Audit Committee on a quarterly basis for acknowledgment, which including summary in the Company's good corporate governance report.

7. Any complaints or whistleblowing in bad faith and/or reporting complaints or providing any information that is not true and was proven as a dishonesty, in case of relevance whistleblower who is either executive or employee of the Company, that person will be subject to receive disciplinary action according to the Company regulations. In case of an outsider and such actions cause the Company damaged, the Company may consider prosecuting the whistleblower as well.

8. In the event that the whistleblowing monitor neglects or fails to comply with this policy, the whistleblowing monitor will receive disciplinary action.

## 7. Work Discipline

This anti-corruption policy and guideline is a part of the work discipline. Therefore, any employee, who is in violation of or not in compliance with this guideline, shall be subject to disciplinary action in accordance with the Company's or its Affiliates' work rules.

## 8. Personnel Management

This anti-corruption policy and guideline is a part of the criteria on personnel management including recruitments, trainings, performance evaluation, remunerations, promotions, and employment terminations. Therefore, the supervisors in all levels must communicate and inform the employees under their supervision to adequately and efficiently understand and comply with this guideline.

## 9. Trainings and Communications

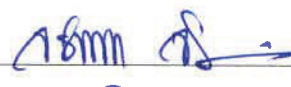
9.1 The Company will provide training on the anti-corruption policy and guideline in orientation to new employees together with successive trainings provided to the Company's personnel to enhance their knowledge and understanding on the matters which will be properly put into practice.

9.2 The Company's personnel will be notified this guideline via the Company's website and Intranet. This guideline may be amended from time to time as deemed appropriate by the Company in respect of which will be notified accordingly.

9.3 The Company will notify the anti-corruption policy and guideline to related persons to the Company's business as well as request for their cooperation to strictly comply.

Announced on 1<sup>st</sup> October 2021

Signed \_\_\_\_\_



(Ms. Jarinya Jirojkul)

Chief Executive Officer