Whistleblowing Policy and Procedure
Southland Rubber Group

1. Introduction
Southland Rubber Group strictly adheres to the standard of transparency, integrity, and responsibility. We expect our employees and stakeholders who witness or encounter any actions or behaviors considered misconduct to report to us.

2. Objective
The objective of this policy is to encourage all employees and stakeholders to report the misconduct of which they witness or encounter or make complaints without the fear of being harassed or discriminated. This policy expects all employees and stakeholders to take the whistleblowing opportunities that we provide instead of turning a blind eye on non-compliance behaviors.
All executives, employees, and stakeholders are required to adhere to the guidelines defined in this policy when reporting misconduct and making complaints.
If employees or stakeholders conduct any wrongdoings, the company shall proceed on investigation and corrective actions in a timely manner.

3. Scope
This Whistleblowing Policy gives opportunities to employees and stakeholder to report on the action or behavior that does not conform to the company’s rules, regulations, and policies e.g.,
   3.1. The violation of the company’s Code of Conduct (e.g., corruption, anti-competition, the breach of internal information, diversity disrespect, sexual harassment and discrimination)
   3.2. The violation of the company’s rules and regulations
   3.3. The action damaging the company’s reputation

4. The identification of whistleblowers or complainants
This policy encourages whistleblowers or complainants to put their names to any disclosure they make. Concerns expressed anonymously are less powerful and may be less easy to investigate. To make confidence for the whistleblower or the complainant who informs the clues or complaints with good faith, the company shall protect them
5. Protection for whistleblowers or complainants

In usual, employees or stakeholders tend to find out the company's misconduct in advance, but they may decide not to expose these concerns raised because they fear that being truthful is a disloyalty to a colleague or the company, or they may be afraid of being harassed. For these reasons, they often choose to turn a blind eye and not report the problem. Therefore, in order to prevent these events from occurring.

5.1 This policy intended to treat any employee or stakeholder who discloses or reports a problem in a confidential and sensitive manner. Whistleblowers or complainants will be protected if they:
5.1.1. Report facts/ true information
5.1.2. Convince the authenticity of information (evidence, etc.)
5.1.3. Have no intention in reporting false information or making a false complaint
5.1.4. Do not use whistleblowing opportunities for seeking personal exploitation or business benefits

5.2 The company shall protect them as follows:
5.2.1. The company will not reveal any sensitive personal data that can identify the whistleblower or complainant e.g., name, address, and others.
5.2.2. The company will keep the relevant information confidential, taking into account the safety of the whistleblower or the complainant or those who cooperate in the investigation.
5.2.3. If the whistleblower or complaint feel unsafe, they can request the company to define appropriate protection measures.
5.2.4. Those who are affected will be relieved through fair and appropriate remedial measures.
5.2.5. The company shall prevent anything that is unfair to the whistleblower or complainant such as changing job position, job description, and workplace, suspension, intimidation, disturbance of work, dismissal or any other actions that are unfair to the whistleblower or complainant.

6. Whistleblowing Procedures

6.1. Whistleblowers or complainants can report their problem and concern through the following channels (written form only):
6.1.1. Any employee who wants to make a written disclosure can contact directly with the supervisor, head of department or manager. The supervisor, head of department or manager will consider whether the problem needs to be reported to the Internal Audit Committee based on its severity and sensitivity.
6.1.2. Whistleblowers or complainants can send a written report to the Internal Audit Director or the Board of Directors through the following channels.
   6.1.2.1 Send a letter to the Internal Audit Director at the company’s headquarters “55 Rajyindee road, Hatyai, Songkhla 90110 Thailand”
   6.1.2.2 Report the problem on the company website “www.southlandholding.co/sl/contact-us.html”

DISCLAIMER: The English version is a translation of the original in Thai for information purposes only. In case of a discrepancy, the Thai original will prevail.
6.1.2.3 Suggestion box provided onsite.

6.2. After the Internal Audit Director receives the case reported and proceeds on consideration, the company will reply to the whistleblower or complainant within 45 days on the following matters:

6.2.1. Confirmation on the protection of the whistleblower or complainant

6.2.2. The investigation method

6.2.3. Inform the whistleblower or the complainant of the progress made and the date of the next reply

6.3. The Internal Audit Committee summons the case received to the Board of Directors for consideration. If necessary, the investigation team will be appointed for further investigation.

6.4. The investigation team proceeds on investigating the case received and reports to the Board of Directors of the result.

6.5. When the fact has been proved by the Internal Audit Director and the Board of Directors, the company will consider appropriate punishment and/or corrective and preventative actions.

Mr. Pherm Tirasarnvong
Managing Director
31 August 2020