

## **Southland Rubber Whistle-blower Policy and Procedures**

### **1.0 Purposes**

- a. This Policy document provides a reliable system for a person to report any wrongdoings, including suspected violation of Southland Rubber Code of Conduct, Policies, or, any applicable laws and regulations without fear of reprisal when whistleblowing in good faith.
- b. The effective implementation of this Whistle-blower Policy shall be overseen by Southland Rubber Compliance Committee and supervised by Southland Rubber Compliance Director, operating from Southland Rubber Thailand and Singapore offices.
- c. This Policy is accessible by all persons including employees (the Board of directors, Managers, Officers, and full-time/part-time/permanent/contract employees) and stakeholders of Southland Rubber.
- d. A designated Director of each Group Company and/or the Head of a branch unit/factory shall be responsible for the collective implementation of and compliance with this Policy.

### **2.0 Application**

- a. This Whistle-blower Policy allows for reporting by employees or stakeholders of Southland Rubber to Southland Rubber Compliance Committee without fear of reprisal, discrimination or adverse consequences and also permits the Committee to address such reports by taking appropriate actions, including but not limited to disciplining or terminating the employment and/or those responsible.
- b. Reportable incidents for Whistle-blowing include:
  - i) Breach of Southland Rubber Code of Conduct and other Policies;
  - ii) Violation of internal regulations of a Southland Rubber Group Company;
  - iii) Failure to comply with applicable laws and regulations;
  - iv) All forms of financial or non-financial malpractices or impropriety such as fraud, corruption, bribery or theft;
  - v) Harassment and abuse of power and authority;
  - vi) Actions detrimental to health and safety of people and to the environment;
  - vii) Discrimination on gender, race, disabilities;
  - viii) Serious conflict of interest without disclosure;
  - ix) Concealing information about any of the above.

### **3.0 Definition**

- a. A Whistle-blower is any person, including Southland Rubber Employees and Stakeholders, who voluntarily reports disclosure of individual or organizational malpractice or suspected or anticipated malpractice listed in paragraph 2b above.
- b. Receiving officer refers to a member of Southland Rubber Compliance Committee appointed by the Compliance Director.
- c. Investigation Team is one appointed by Southland Rubber Compliance Director to

conduct investigation into any suspected malpractice.

#### 4.0 Reporting Mechanism

- a. Southland Rubber encourages Whistle-blowers who report their concerns to provide their names, contact details, position in Southland Rubber or relationship with Southland Rubber whenever possible.
- b. Concerns reported anonymously will be taken up depending on the following:
  - i) Seriousness of issues;
  - ii) Significance and credibility of concerns;
  - iii) Likelihood of the report being verifiable.
- c. Concerns may be raised verbally or in writing for Southland Rubber to be able to effectively evaluate and investigate.
- d. The report should provide as much details or specific as possible:
  - i) Names of people and/or organization involved
  - ii) Details of the incident (what, where, when)
  - iii) Any supporting evidence
- e. The contact details of the Receiving officer are either one:

Southland Holding Ltd.	Southland International Pte. Ltd.
The Compliance Director	The Compliance Director
Hotline: +66-91 569 1989	Hotline: +65-92278865
<a href="http://www.southlandholding.co/sl/contact-us.html">www.southlandholding.co/sl/contact-us.html</a>	Email: <a href="mailto:whistleblow@southlandglobal.com">whistleblow@southlandglobal.com</a>
Address: 55 Rajyindee Road, Hatyai, Songkhla, Thailand 90110	Address: 8 Cross Street, #27-01 Manulife Tower Singapore 048424

#### 5.0 Confidentiality and Non-Retaliation

- a. The Identity of the Whistle-blower shall be kept confidential within Southland Rubber Compliance Committee and its Investigation Team.
- b. Southland Rubber Compliance Director will seek the Whistle-blower's consent in case of need to disclose to anyone other than Southland Rubber Compliance Committee and its Investigation Team.
- c. Southland Rubber prohibits discrimination, retaliation or harassment of any kind against any Whistle-blower who reports a concern in good faith.
- d. Such conduct is a breach of Southland Rubber Code of Conduct and anyone who engages in retaliation against a Whistle-blower may be subject to disciplinary action.
- e. If a Whistle-blower believes in being subjected to discrimination, retaliation or harassment for having made a report, he or she can immediately report the facts to Southland Rubber Compliance Director for prompt investigation and appropriate actions.
- f. All information disclosed will remain confidential, except as necessary to conduct investigations and to take any corrective actions in accordance with applicable laws and regulations.
- g. Southland Rubber reserves the right, if necessary to do so, to refer any concerns or complaints to appropriate external regulatory authorities.

- h. Depending on the nature of the complaint, the subject of the complaint may be informed of the report against him or her and be provided with an opportunity to reply to such report.

## **6.0 Handling Procedures**

- a. If, at the conclusion of any investigation, the Compliance Committee determines that a violation has occurred or the allegations are substantiated, appropriate disciplinary action in accordance with applicable Company Regulations and the Employment Agreement will be taken.
- b. Any disciplinary action will be recommended by Compliance Committee to the Compliance Director and/or the CEO.
- c. The respective Group Company is expected to undertake any recovery and remediation actions identified by the Investigation Team subsequent to an investigation.
- d. A non-anonymous whistle-blower will be informed that action has been taken at the conclusion of the investigation, without divulging confidential information.
- e. If an Employee has made an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against him or her.
- f. Likewise, if investigations reveal that the external Party making the complaint had done so maliciously or for personal gain, appropriate actions, including reporting the matter to the police, may be taken.

## **7.0 Communication, Clarification and Review of the Policy**

- a. The Whistle-blower Policy shall be communicated:
  - i) To all new Employees during the orientation and compliance training;
  - ii) To all Employees as part of compulsory refresher training; and
  - iii) When requested by Southland Rubber Compliance Committee or the Compliance Director.
- b. Principles of the Whistle-blower Policy shall be communicated to all relevant stakeholders.
- c. The Whistle-blower Policy shall be reviewed regularly, where Southland Rubber may modify this Policy to maintain compliance with applicable laws and regulations or organizational changes.
- d. The review should be carried out by the Compliance Director.

**Updated by the Management of Southland Rubber  
1 January 2022**