

Insider Information Usage and Securities Trading Policy

STECON Group Public Company Limited and its subsidiaries

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1. Introduction

STECON Group Public Company Limited and its subsidiaries operate their business in accordance with the principle of good corporate governance. Therefore, the Company has established the "Insider Information Usage and Securities Trading Policy" in order to ensure that the relevant action is related to the insider information usage and securities trading of the Company's directors, executives and employees are in accordance with the Securities and Exchange Act B.E. 2535 (1992) and related laws. It is for preventing the usage of insider information to be the material for changing in the price of securities. This is considered to be taking advantage of others and unfair trading as well as to ensure that the Company's business operation is transparent and fair in accordance with the principle of good corporate governance.

2. Definition

Executive	refers to	The first four executives from the Group Chief Executive Officer/President downward including all persons holding the equivalent position of the fourth executive position holder who are including the holder of an executive position in the field of accounting or finance at the level of manager or higher or equivalent.
Securities	means	Securities, convertible securities and derivatives contracts as announced by the Securities and Exchange Commission.
Inside information	refers to	The information of the company that has not been disclosed to the general public. This is important for changing the price or value of securities such as financial statements, business plan, investment, etc.
Impact on securities prices	means	The impact that causes the price of securities to rise, lower or support the price of securities.
The usage of insider information	refers to	The usage of Insider Trading which has occurred when an individual, by virtue of their position or status, gains access to material, non-public information about a company that could significantly affect the price of its securities, and subsequently engages in buying or selling those securities based on this information before it is equally disclosed to the public. This practice is considered unfair advantage over others and constitutes unfair trading.

3. Scope

3.1 This Policy applies to all directors, executives and employees of the Company.

3.2 Encourage suppliers and stakeholders to acknowledge and act in the same direction.

4. Duty and Responsibility

4.1 The Board of Directors assigns the Group Chief Executive Officer/President to act as a supervisory officer. "Insider Information Usage and Securities Trading Policy" in order to ensure that all directors, executives, and employees strictly adhere to and comply with this policy and monitor the effective implementation.

4.2 The Group Chief Executive Officer/President organizes the "Insider Information Usage and Securities Trading Policy" to be implemented throughout the company.

4.3 All executives have the responsibility to communicate, ensure understanding, and raise awareness among employees under their direct line of command.

4.4 All directors, executives and employees are responsible for complying with this "Insider Information Usage and Securities Trading Policy" strictly.

5. Policy and Practice

5.1 The Usage of Insider Information and Securities Trading

(1) "Person designated by the Company" means a person with a position or duty who has the information of the Company's internal information including: Spouse or cohabitant, husband and wife, and minor children of such persons are:

- (a) Directors, executives or persons with authority to control the Company's affairs;
- (b) An officer or employee of the Company who is in a position or line of work is responsible for insider information or who has access to insider information;
- (c) A person who is in a position to know the insider information due to the performance of his or her duty relates with the insider information;
- (d) A juristic person in which the person under (a), (b) or (c) has the authority to control the business;
- (e) Any other person as required by law.

(2) Persons designated by the Company is prohibited to disclose insider information to any other person, directly or indirectly and in any way. The recipient knows or should know that the information may be used to buy or sell securities or to be bound by derivatives, contracts related to securities Whether for themselves or any other person, including disseminating or using insider information for personal benefit or other persons, whether directly or indirectly, except in a manner

that is not an exploitation of another person or in a manner as specified by the Securities and Exchange Commission.

- (3) Directors, executives and employees of the Company who know or possess the Company's internal information. The Company must maintain such internal information with care and security to prevent the leakage of insider information to the external parties, and must not disclose the Company's or its subsidiaries' internal information to other persons who are not responsible for such internal information. To prevent internal information from being used for the benefit of oneself or others.
- (4) The Company has measures to protect the security of computer and information system by using information technology systems in management to prevent access to the Company's information and to determine the rights of accessing the Company's information at various levels appropriately according to the responsibility of employees and individual executives, information protection, penalty and enforcement, etc.

5.2 Blackout Period for Securities Trading

It is forbidden for a person designated by the Company to trade in the Company's securities for a period of at least one month before the Company's quarterly and annual financial statement are made available to the public within 24 hours after the public disclosure of such quarterly and annual financial statement (Blackout Period).

5.3 Advance Notice before Securities Trading

The Company's directors and executives are required to notify the Company Secretary at least 1 day in advance before trading the Company's securities in order to prevent trading of the Company's securities during the blackout period.

5.4 Reporting Changes in Securities Holding

- (1) The person who is responsible for reporting changes in the Company's securities holdings must be in accordance with the Securities and Exchange Act B.E. 2535 (1992) and any other relevant announcements (including the amended version) which are as followings;
 - (a) Directors of the Company;
 - (b) Group Chief Executive Officer/President and Executive Officers
 - (c) The Company's auditor

In addition, the person who is responsible for reporting changes in the company's securities holdings of persons related to them must be required to report the changes in the company's securities holdings as followings;

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- (d) Spouse or cohabitants, husband and wife, and minor children of (a), (b) and (c)
 - (e) a juristic person under (a) or (b) or (c) who collectively holds shares in (d) in excess of 30% of the total number of voting rights of such person, and such combined shareholding is the largest proportion in that juristic person, unless otherwise exempted by law.

(2) Reporting of Changes in Securities Holdings

- (a) Directors and Executives are responsible for preparing disclosure and submission of report on the holding and changes in the holding of the securities of the Company or the person responsible for reporting the change in the holding of the securities of the Company to the Office of the Securities and Exchange Commission in accordance with the Securities and Exchange Act B.E. 2535 (1992) and any other relevant announcements. The Company must report changes in its holding when securities are purchased, sold, transferred or transferred after holding office except for case that is exempt from reporting according to the Notification of the Office of the Securities and Exchange Commission No. Sor Jor 38/2018. Re: Preparation of Report on Changes in Securities Holdings and Derivatives Contracts of Directors administrator Auditors, planners, and plan administrators.
- (b) The person is responsible for reporting the change in securities holdings Report on changes in securities and derivatives holdings according to the announcement of the Office of the Securities and Exchange Commission (SEC) electronically within 3 working days and send a report on changes in securities holdings according to the information in the report on changes in securities holdings and derivatives contracts to the Company Secretary for the report of such changes to the Board of Directors for acknowledgment and retention as evidence.
- (c) The Company Secretary is responsible for providing information to the person responsible for reporting changes in securities holdings in accordance with the notification of the Securities and Exchange Commission about preparation and disclosure of securities holding report and any other relevant law.

6. Complaints and whistleblowing

In order for the Company have good corporate governance and give all groups of stakeholders the right to report whistleblowing, illegal act or the Company's code of conduct or policy or complaints of infringement of right or suggestion about the Company's business operation. The Company provides a channel for whistleblowing and complaints.

The complainants can submit complaints with documents by specifying his name, address, convenient telephone number, and e-mail (if applicable) clearly. It is sent to the recipient of the complaint at the address as followings;

Audit Committee

Address : Stecon Group Public Company Limited

32/59-60 Sino-Thai Tower, 29th-30th Floor, Sukhumvit 21 Road (Soi Asoke)

Khlong Toei Nua, Wattana, Bangkok 10110

e-mail address : auditcommittee@stecongroup.co.th

Phone: 02-610-4900 Ext. 1530

Process when receiving the whistleblowing or complaints

- 1) The Secretary of the Audit Committee collects and verifies the accuracy and adequacy of information and fact. If it is found that the act is already an offense, the preliminary action guideline will be presented to the Audit Committee.
- 2) The Audit Committee considers complaints submitted by the Secretary of the Audit Committee and will proceed by appointing a working group or assigning a person to act. The appropriateness is considered on a case-by-case basis.
- 3) Working groups or assignee consider the guidelines for investigating and suppressing the offense and mitigate the damage to those affected, take into account all the overall suffering and report directly to the Audit Committee.
- 4) When the process is finished. The working group or the person assigned to report the conclusion to the Audit Committee and the Secretary of the Audit Committee and notify the whistleblower or complainant if they disclose themselves as well as collect relevant information confidentially.
- 5) If the matter has an impact on the image of the organization or is related to senior management or is a significant issue for the Company's business operation. The Audit Committee will consider and present the conclusion to the Board of Directors.

Measurement to protect whistleblowers

The Company will consider the information of the whistleblowers to be complainant or person who cooperates in investigating the fact including confidential related information. Disclosure will be made with care and sparingly, taking into account the safety and damage of the whistleblowers. Complainant or person who cooperates in investigating the facts including sources of information or related persons.

7. Penalty for Offense

Punishment for wrongdoing must be in accordance with the Company's regulations and/or as required by law.

This Inside Information and Trading Policy Approved by the Board of Directors' Meeting No. 2/2024 on February 27th, 2024 and shall be effective from February 27th, 2024 onwards.

Promulgated on 27th February 2024

(Mr. Vallop Rungkijvorasathien)

Chairman of the Board of Directors
Stecon Group Public Company Limited