

## Disclosure Policy

### SCG Chemicals Public Company Limited

The Board of Directors Meeting of SCG Chemicals Public Company Limited (“the Company”) No. 279 (15/2021) held on December 18, 2021 resolved to approve the first Disclosure Policy, and the Board Meeting No. 282 (3/2022) held on March 30, 2022 subsequently endorsed the continuous enforcement of this Policy upon the conversion of the Company into a public limited company.

Disclosure of information of SCG Chemicals (definition as shown below) is continuously committed to integrity, transparency and verifiability according to the corporate governance principles. The Board of Directors has resolved to approve Disclosure Policy of SCG Chemicals to ensure accuracy, compliance with the law, and equality.

### Definitions

**Key information** means information regarding SCG Chemicals’s business operations which, if disclosed via improper methods, may have material effects on SCG Chemicals’s ability to operate its business or on stock prices, or influence investment decisions, whether such information is related to finance, investments or trade secrets, as follows:

1. Financial statements (financial position statement, profit and loss statement, cash flow statement, statement of changes in owner's equity, notes to financial statement) and material changes in accounting policies
2. Information regarding important mergers, acquisitions and dispositions of associated companies/subsidiaries that may affect or change SCG Chemicals’s business structure.
3. Information regarding acquisitions and expenditures of assets or information related to investment, divestment, capacity expansion or capacity reduction important to SCG Chemicals.
4. Information regarding payments or non-payments of dividends, or changes in dividend policies of the securities issuing companies in SCG Chemicals.
5. Information regarding the securities of securities issuing companies in SCG Chemicals; for instance, capital increases, reissuing securities, and changing of par values.
6. Information regarding important legal disputes of SCG Chemicals.
7. Information regarding productions or ceases of production of SCG Chemicals’s important goods.
8. Information regarding operational policies or strategies of SCG Chemicals.
9. Information regarding states, business directions as well as forward-looking Information of SCG Chemicals, in particular profit and loss summary.
10. Other information regarding SCG Chemicals deemed likely to affect stock prices or influence investment decisions.

Note that important information is deemed as such based on the criteria for information disclosure defined in the Securities Exchange of Thailand’s notifications about information disclosure practices of listed companies.

**Securities issuing companies in SCG Chemicals** means SCG Chemicals Public Company Limited or its subsidiaries with listed securities in the Securities Exchange of Thailand or foreign stock markets.

**Effects on stock prices** means effects causing the stock prices of the securities issuing companies in SCG Chemicals to increase, decrease, stabilize or support for the stock prices.

**SCG Chemicals** means SCG Chemicals Public Company Limited and subsidiaries of SCG Chemicals Public Company Limited according to the consolidated financial statement.

## **Disclosure Policy**

1. SCG Chemicals is committed to compliance with disclosure laws in all countries in which SCG Chemicals operates or will operate its business.
2. SCG Chemicals must perform disclosure of material non-public information with caution, accuracy and completeness and without material faults, in consistent with laws, rules, standards and practices of relevant agencies, in a timely, fair and thorough manner. Actions must be taken to ensure sufficient, equal and easily accessible information for decisions of the shareholders or investors via disclosure channels on SCG Chemicals's website or other channels specified by relevant agencies in each matter, as appropriate. Note that time period for such disclosure should be taken into account with caution.

Furthermore, SCG Chemicals must designate parties with the rights to disclosure of material non-public information and explicitly define the parties' scope of responsibilities to ensure that SCG Chemicals's communications of material information are from the same source and consistent across the parties without causing any confusion while prohibiting employees from disclosing material non-public information at any time, unless assigned by the Chief Executive Officer and President of SCG Chemicals.

3. SCG Chemicals must perform explicit and full disclosure of material public information without causing any confusion. Moreover, provision of additional information regarding the disclosed material information must be clear and consistent without misrepresenting the disclosed information.
4. SCG Chemicals must perform disclosure of information regarding the business operation's state and direction, as well as SCG Chemicals's forward-looking information, with caution and without causing any confusion in the matter, while offering explanation about the conditions and assumptions applied alongside the prediction. Within such process, SCG Chemicals must also verify information sources and determine the validity of such information before being utilized in the analyses or predictions.
5. SCG Chemicals must perform disclosure of other non-material information on the basis of reality neither with intention of misrepresenting facts regarding financial status, performance, stock prices, nor in a manner which misleads others into thinking that the stock prices may be affected.
6. SCG Chemicals must not perform disclosure of material information or other related information regarding highly sensitive matters before the date on which such disclosure will be performed to the Securities Exchange of Thailand or foreign stock markets and the public.
7. In conducting disclosure of material information to the public, SCG Chemicals must implement a procedure which ensure transparency, clarity, validity, timeliness and sufficiency for investment decisions.
8. To comply with this Policy, SCG Chemicals's Code of Conduct and Corporate Governance Handbook must also be applied.
9. Failure to comply with this Policy is considered a violation of SCG Chemicals's Code of Conduct.

## **Practices**

### **1. Implementation of a system for material information disclosure**

- 1.1 The Investor Relations Office must implement a disclosure system for material information necessary for investment decisions in SCG Chemicals's securities to ensure transparency, clarity, validity, timeliness and sufficiency for investment decisions.
- 1.2 The Investor Relations Division must regularly review the system for material information disclosure of the divisions involved in the disclosure of material information to ensure better efficiency and effectiveness.

## **2. Management of material information disclosure**

- 2.1 All divisions involved in the disclosure of material information must compile a register of material information to be disclosed to monitor the material information of which such divisions must performed disclosure with transparency, clarity, validity, timeliness and sufficiency for investment decisions.
- 2.2 All divisions involved in the disclosure of material information should establish an operation standard concerning disclosure of material information to the Securities Exchange of Thailand, foreign stock markets, relevant governing agencies as well as the public, while taking into account the following laws, standards and best practices:
  - 2.2.1 Disclosure of material information of the securities issuing companies in SCG Chemicals must be performed in a manner that ensure valid, complete, sufficient and genuine information. Such information must be up-to-date and disclosed in a timely, thorough and fair fashion. Such disclosure or provision of information must not be exclusive to specific groups or individuals. Furthermore, such disclosure of material information must not be performed before the date on which such disclosure will be performed to the Securities Exchange of Thailand, relevant foreign stock markets and the public
  - 2.2.2 Disclosure of material information to analysts, shareholders or other specific individuals must be performed with the certainty that such disclosed material information is the information thoroughly disclosed to the public beforehand.
  - 2.2.3 The content and disclosure period of the material information to be disclosed must comply with the requirements of the Securities Exchange of Thailand and relevant foreign stock markets, as well as standards and practices of relevant agencies.
    - 2.2.3 (1) Accurate, clear information
    - 2.2.3 (2) Numerical information sufficient for the investors to compare activities of the securities issuing companies in SCG Chemicals
    - 2.2.3 (3) Unbiased, straightforward information: no concealment or mutilation of certain facts which may cause misunderstanding
    - 2.2.3 (4) Simple language which is accessible to the general public and not overly technical
    - 2.2.3 (5) No inappropriate language or unnecessarily excessive disclosure which may mislead the investors or result in price changes or unreasonable purchases/sales of stocks
- 2.3 In case where notices of material information of the securities issuing companies in SCG Chemicals to the Securities Exchange of Thailand, foreign stock markets or relevant governing agencies are underway, relevant employees of SCG Chemicals must not disclose such material information to the public as this may cause confusion among investors and unequal distribution of such information. Therefore, the order of disclosure procedure in various channels must be established and introduced in training sessions to employees of SCG Chemicals who involve in such disclosure: starting with disclosure of material information to the Securities Exchange of Thailand, foreign stock markets or relevant governing agencies, after which it is disclosure, such material information can then be disclosed to mass media, investors and via other channels.
- 2.4 The securities issuing companies in SCG Chemicals have responsibilities for prompt disclosure of material information to the Securities Exchange of Thailand and relevant foreign stock markets when the material information of the securities issuing companies in SCG Chemicals regarding operations, or events, or securities trading status of the securities issuing companies, which may produce significant effects on the securities trading prices of the securities issuing companies in SCG Chemicals, or such information is of great importance and benefit to investors in analyses by analysts or experts in investment decisions, or such information have, or may have, impacts to the shareholders' benefits.

- 2.5 In case where material information or events, or important projects which meet the following criteria, all relevant divisions may decide to refrain from prompt disclosure of information, where confidentiality of such information must be ensured beforehand.
- 2.5.1 Prompt disclosure of material information will significantly jeopardize SCG Chemicals's interests or have negative effects on SCG Chemicals's ability to fulfill SCG Chemicals's business objectives; for instance, disclosure of real estate purchases may lead to rise in the real estate prices, so it should be delayed until a more appropriate time.
- 2.5.2 When facts are subject to changes, constant disclosure of the same matter to the public based on the changed facts may cause confusion or mislead such public. For example, during a negotiation of acquisition where certain conclusion is yet to be reached, such certain conclusion must be reached first, without necessity of explicit announcement of each negotiation's step.
- 2.6 In case of disclosure of predictions or analyses of information regarding status, business directions as well as forward-looking Information of SCG Chemicals, the source of such information utilized in such predictions and analyses must be verified and the validity of such information must be determined before being utilized in such predictions or analyses. Moreover, such predictions must neither be exaggerated nor inaccurate, while such disclosure must be performed with caution without misrepresenting the essence, and must involve explanation of conditions or assumptions used in conjunction with such predictions. Sources of such information must be verified and its validity must also be determined beforehand.
- 2.7 The securities issuing companies in SCG Chemicals are not required to disclose estimations or predictions related to profits or other information intended for SCG Chemicals's internal use. However, if such disclosure is to be performed, the companies issuing securities must proceed with caution and reasonable assumptions while informing facts with appropriate conditions. Note that if such estimations or predictions are later revealed to be erroneous, the securities issuing companies in SCG Chemicals must troubleshoot accordingly and inform the Securities Exchange of Thailand and relevant foreign stock markets immediately.
- 2.8 In case of rumors and news regarding future predictions of total sales, profits or other information, typically the securities issuing companies in SCG Chemicals are not required to take any actions unless such rumors or news are highly erroneous to the point that they may explicitly exert effects on stock prices or investment decisions; in which case, the securities issuing companies in SCG Chemicals should then consider, as appropriate, inform the Securities Exchange of Thailand and relevant foreign stock markets of the facts.
- 2.9 In case of unusual trading of securities of the securities issuing companies in SCG Chemicals based on the market condition, all relevant divisions should monitor such unusual situation and attempt to identify the cause of it: whether it is from any specific information of SCG Chemicals. If it is disclosed information, the securities issuing companies in SCG Chemicals are not required to take any actions. If there is a potential insider information leak, the securities issuing companies in SCG Chemicals should consult specialists to consider taking measures.

### **3. Assignment of personnel and responsibilities related to disclosure of material information**

#### **3.1 Spokesperson**

The individuals with the right to respond to inquiries or provide SCG Chemicals's material information yet to be disclosed to the public include:

- (1) Chief Executive Officer and President of SCG Chemicals;
- (2) Chief Financial Officer;
- (3) Investor Relations Manager or Manager - Brand Management Office of SCG Chemicals;
- (4) All individuals assigned by the individuals stated in (1) or (2) (only for assigned matters).

### **3.2 Divisions in charge of governing material information disclosure**

All divisions responsible for controlling and examining disclosure of SCG Chemicals's material information to the third party include:

- (1) The Brand Management Office, which is responsible for communication of material information to mass media;
- (2) The Corporate Secretary Office and Accounting Office, which are responsible for disclosure of material information to the Securities Exchange of Thailand, foreign stock markets and relevant governing agencies;
- (3) The Investor Relations Office, which is responsible for provision of material information for analysts or asset management companies.
- (4) All divisions designated by the Chief Executive Officer and President of SCG Chemicals or the Chief Financial Officer (only for assigned matters).

### **3.3 Employees of SCG Chemicals**

The Corporate Secretary Office must communicate and raise awareness of all SCG Chemicals's employees about the effects following disclosure of SCG Chemicals's material information. All employees involved in such disclosure of information may disclose only the information that has already been disclosed to the public beforehand.

All employees without responsibilities for disclosure of material information must also disclose SCG Chemicals's information with caution to prevent confusion. Therefore, they should not disclose any material information that has come to their knowledge until SCG Chemicals has already published such material information to the public.

## **4. Development of knowledge, understanding and awareness**

- 4.1 The Corporate Secretary Office must arrange a training session for the executives of listed companies and subsidiaries that are likely to perform disclosure of information to third parties, the objectives of which are for such companies to acknowledge their scope of responsibilities regarding disclosure of material information as well as best practices of material information communication to third parties.
- 4.2 The Corporate Secretary Office must raise awareness about and foster a culture of material information disclosure, where the process must be carried out while putting priorities on transparency, accuracy and SCG Chemicals's reputation, for the employees of SCG Chemicals.
- 4.3 Due to the importance of material information disclosure to the securities issuing companies in SCG Chemicals, especially disclosure to the shareholders and investors, as well as the Securities Exchange of Thailand and foreign stock markets, any questions or doubts should be consulted with SCG Chemicals's relevant experts, including legal advisors, the Corporate Secretary Office, the Brand Management Office and the Investor Relations Office.

## **5. Monitoring and reporting**

- 5.1 Designate the divisions involved in disclosure of material information and the Internal Audit Office to monitor and report disclosure of material information to ensure SCG Chemicals's proper and complete compliance with applicable laws, policies and practices.
- 5.2 Designate the divisions involved in disclosure of material information to report to their superiors and top executives promptly when requests from the Securities Exchange of Thailand and foreign stock markets are received, by informing about material information or any events that occur for the executives to make decisions regarding further disclosure of information.
- 5.3 The executives must provide SCG Chemicals's employees with support that enables them to report any behaviors or actions that may involve sharing, publishing and approving false information, or disclose to third parties the results of analyses or predictions of SCG Chemicals's operations using false, incomplete or misrepresented information, which may bring about impacts on stock prices or effects on investment decisions in securities. SCG Chemicals's employees may report such behaviors or actions to their trusted superiors or the individuals responsible for complaint management as assigned by SCG Chemicals, or via the Whistleblowing System.

In addition, the reporters or information providers are protected under the Whistleblowing Policy.

### **Scope of practices**

1. The securities issuing companies in SCG Chemicals with transactions which are related to material information and warrant responsibilities for disclosure of information as required by the laws.
2. All directors, executives and employees of SCG Chemicals must comply with applicable laws concerning disclosure of information.
3. SCG Chemicals's provision of information, including in writing or verbally; via phone call or through online media, press conferences to shareholders, correspondents, or investors; teleconferences; video conferences via various methods; as well as provision of information via channels established by government agencies or other individuals for the general public's access.
4. Compliance with applicable laws concerning disclosure of information in all countries in which SCG Chemicals operates or will operate its business.

### **Roles and responsibilities**

1. All directors, executives and employees of SCG Chemicals must understand their own roles and responsibilities in disclosure of SCG Chemicals's material information and strictly comply with applicable laws and policies on disclosure of SCG Chemicals's information.
2. The Investor Relations Division must establish a system for disclosure of material information to ensure transparency, clarity, validity, timeliness and sufficiency for investment decisions. The Compliance Division must also arrange communication, promotion and support in conjunction with knowledge, understanding and skill expansion for SCG Chemicals's employees regarding proper and regular compliance with applicable laws, policies and practices, as well as establish monitoring measures to ensure that SCG Chemicals properly and completely comply with applicable laws, policies and practices.
3. SCG Chemicals's employees involved in disclosure of material information must understand their own roles and responsibilities regarding compliance with this Disclosure Policy, by developing knowledge, understanding and skills in their own responsibilities as individuals with in-depth knowledge, attention and care for their assigned responsibilities and tasks.

### **How to submit inquiries**

To comply with this Disclosure Policy, use SCG Chemicals's Code of Conduct and Corporate Governance Handbook as references, and for any inquiries, consult your superiors or relevant support divisions, including the Investor Relations Officer, Brand Management Office, legal advisors or Corporate Secretary Office, etc.

This Policy shall be effective from December 18, 2021 onwards.

**Announced on April 4, 2022**

*-signed by-*

**(Mr. Chumpol NaLamlieng)**  
**Chairman of the Board of Directors**