

**Insider Information Management Policy**  
**SCG Chemicals Public Company Limited**

The Board of Directors Meeting of SCG Chemicals Public Company Limited (“the Company”) No. 276 (12/2021) held on September 22, 2021 resolved to approve the first Insider Information Management 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.

**Definitions**

SCG Chemicals means SCG Chemicals Public Company Limited and its subsidiaries according to the consolidated financial statements of SCG Chemicals Public Company Limited.

**Policy**

To operation the Company, any director, executive, employee and engaged person of SCG Chemicals will consider and be informed of information that may affects the price of the security and not yet be able to disclosed to shareholders, investors or general public, then it is important to administrate the use of insider information so that it will not be leak or used inappropriately and bring advantage over other persons which will be not only illegal but also impact reputation of SCG Chemicals. The Board of Directors of the Company, thus, approved the Insider Information Management in order that all directors, executives and employees will conduct and communicate correctly under the following details:

In this policy “insider information” means the information which has not yet been disclosed to public whose material content could influence changes in securities prices or values.

1. SCG Chemicals commits to operate in accordance with any laws concerning insider trading in every country it has or going to have business.
2. Any director, executive, employee of SCG Chemicals and other person working with SCG Chemicals who accesses or possesses insider information must:
  - 2.1 maintain insider information of SCG Chemicals with due care and safe in order to prevent its leakage.
  - 2.2 not disclose insider information of SCG Chemicals to any other person not being engaged with assigned work in order to prevent usage of insider information for benefits of such person or others.

This is because it may influence prices or values of the securities of the Company or its subsidiaries or associates who are listed companies relating to insider information or influence investment decision.

3. Any director, executive, employee of SCG Chemicals and other person working with SCG Chemicals who accesses or possesses insider information must not purchase or sell securities relating to insider information which he or she gains more advantage than other persons not knowing insider information.
4. Any director, executive and employee working in the division relating to insider information must comply with the blackout period measurement as prescribed in this policy to prevent them from the risk of wrongful use of insider information.
5. SCG Chemicals must implement a security system to prevent leakage of insider information that it will not be used for purchasing or selling securities for his or her own benefits or others.

6. The directors, executives and employees of SCG Chemicals have their own duties to strictly comply with their charters, code of conduct and corporate governance handbook of SCG Chemicals as well as the rule of using insider information under the Securities and Exchange Act B.E. 2535 (and its amendments) (“Securities Act”) and Public Limited Companies Act B.E. 2535 (and its amendments) and other applicable rules.
7. Any director, executive and employee of SCG Chemicals who does not comply with this policy is considered breaking discipline and subject to punishment including those prescribed by laws if it is breach of laws.

### **Blackout period measurement**

The Company’s directors, executives including persons holding an executive position in accounting or finance at a divisional manager or equivalent level, employees of the offices relating to insider information including their spouse or cohabiting couple knowing insider information are prohibited from trading the securities of the Company or other listed companies relating to insider information during a period of one (1) month before disclosure of any quarter and annual financial statements and within 24 hours after such disclosure.

Moreover, the Company’s directors, executives, employees of the offices relating to insider information including their spouse or cohabiting couple knowing insider information of the Company or other listed companies relating to insider information are prohibited from trading the securities of said companies until after 24 hours from the time of disclosure of all said insider information to public.

### **Reporting of Holding and Changing of Holding of Securities and Derivatives**

1. The Company will provide knowledge to the board of directors and executives of the Company including persons holding an executive position in accounting or finance at a divisional manager or equivalent level regarding their duties on preparing, disclosing and submitting the reports on their holding and changing of holding of securities and derivatives, and their spouse or cohabiting couple and minor children including the holding of securities and derivatives, and the change to such holding, by a juristic person whose shares exceeding 30 percent of the total voting rights are held by the board of directors and executives of the Company, the spouse or cohabiting couple, and minor children of such persons to the Office of the Securities and Exchange Commission (“Office of SEC”) according to Securities Act, Notification of the Securities and Exchange Commission and applicable notifications of Capital Market Supervisory Board including punishment according to relevant laws.
2. The board of directors and executives of the Company including persons holding an executive position in accounting or finance at a divisional manager or equivalent level of the Company must prepare, disclose and submit the reports on holding and changing of holding of their securities and derivatives and their spouse or cohabiting couple and minor children including juristic persons under Securities Act, Notification of the Securities and Exchange Commission and applicable Notification of the Capital Market Supervisory Board to the Company Secretary before every submitting to the Office of SEC in a form and within the following periods:
  - 2.1 within seven (7) working days from the date of purchase, sale, transfer or acceptance of transfer of securities or derivatives in the case where the person with the duty to report is a director or an executive of the Company, and in accordance with all of the following regulations:
    - (a) the Company shall report the names of the directors and executives through the Directors and Executives Information System according to the method specified by the Office of SEC in the Notification of the Office of SEC concerning Forms and Methods for Reporting or Changing the Information of Company Directors and Executives;
    - (b) the persons with the reporting duty report shall report purchase, sale, transfer or acceptance of transfer of securities or derivatives before having their names listed in the Directors and Executives Information System under (a).
  - 2.2 within three (3) working days from the date of purchase, sale, transfer, or acceptance of transfer of securities or derivatives in any case other than 2.1.

## **Maintaining and Protecting Usage of Insider Information**

Insider information is deemed a valuable information. Using insider information jointly must be made within assigned duty and responsibility only. Disclosing insider information to public including communicating any information relating to insider information must be agreed by the Chief Executive Officer and President or the Chief Financial Officer or authorized persons only.

This Policy shall be effective from March 30, 2022 onwards.

**Announced on April 4, 2022**

*-signed by-*

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

### Note:

The first amendment to this Insider Information Management Policy was made pursuant to the resolution of the Board of Directors Meeting No. 282 (3/2022) on March 30, 2022.