

STP & I Public Company Limited

Inside Information Prevention and Securities Trading Policy

(This policy has been approved at the Board of Directors' Meeting No. 3/2023 on 10th March 2023)

1. Introduction

STP & I Public Company Limited has operated its business in compliance with the Good Corporate Governance Principles; therefor, the Company have established the **“Inside Information Prevention and Securities Trading Policy”** to ensure that the practices of directors, management and employees of the company in relation to the use of inside information and the company securities trading are in conformity with provisions of the applicable laws in order to prevent insider trading, which is considered an unfair practice, and to improve transparency and Good Corporate Governance of the Company.

2. Definitions

The next four management	means	The next four management succeeding President, every person holding an equivalent position to the fourth executive, and shall include the persons holding and executive position in accounting or finance at a managerial or equivalent or higher level.
Securities	means	Shares, Convertibles, and Derivatives in accordance with notifications of the securities and Exchange Commission.
Insides Information	means	Information that has not been generally disclosed to the public and is material to the change of price or the value of securities, such as financial statement, business plan, and investment plan.
Effect on the Securities price	means	The effect that causes securities price or rise, fall, be maintained, or stabilized.
Insider Trading	means	The buying or selling of a security by an individual who has access to material information about the security when such information is still nonpublic. Trading while having special knowledge is unfair to other investors who don't have access to the knowledge

3. Scope

- 3.1 This policy applies to all directors, management, and employees of the Company.
- 3.2 Business partners and stakeholders are encouraged to acknowledge and comply with the Policy.

4. Duties and Responsibilities

- 4.1 The board of Directors assigned President to be responsible for supervising “Inside Information Prevention and Securities Trading Policy” to ensure that this policy is strictly complied by all directors, management, and employees and to monitor for effective implementation.
- 4.2 President is responsible for putting “Inside Information prevention and Securities Trading Policy” into practice throughout the Company.
- 4.3 Management is responsible for communicating and raising awareness for their own subordinates.
- 4.4 All directors, management and employees are obliged to strictly comply with this “Inside Information prevention and Securities Trading Policy” .

5. Policy and Procedures

5.1 Inside Information Prevention and Securities Trading

- (1) “Designated Persons” means any persons who hold a position or responsible for the Company’s inside information, including their spouse or cohabiting couple and minor children, such as
 - (A) Directors, management, or controlling person of the Company.

- (B) Employees or workers of the Company who hold a position, or is in the line of work, responsible for or capable of accessing inside information.
 - (C) Any person who is able to know the Company's inside information by performing duties.
 - (D) Juristic person whose business is under control of the persons under (A) (B) or (C).
 - (E) Any other persons as prescribed by law.
- (2) Designed persons are prohibited from disclosing the Company's inside information to other persons, either directly or indirectly and by any means, while one knows or ought reasonably to know that the receiver of such information may exploit such information for trading securities or entering into a derivatives contract related to the Company securities, either for the benefit of oneself or other persons. Moreover, Designated persons are prohibited from disclosing or using the Company's inside information for their own or other person's benefit, either directly or indirectly, except when such action does not have the characteristics of taking an advantage of other persons or has the characteristics as specified in the notification of the Securities and Exchange Commission.
- (3) The recipients of the inside information are limited on a need-to-know basis.
- (4) The Company has adopted information technology system to prevent access to the Company's information and stipulated the lights of access to the Company's information in various levels suitably in accordance with the responsibilities of each management and/or employees. The Company had an information technology policy. It was created to clearly define rules for safe use of computers and information technology of the Company, such as

prevention of misuse of information system network, protection of information, punishment, and application Policy.

5.2 Blackout Period

Designed persons are prohibited from trading the Company securities for a minimum period of one month prior to the disclosure or publication of the quarterly and annual financial statements and within 24 hours after disclosure of such financial statement to the public.

5.3 Prior Notification for Securities Trading

Directors and the next four management who intend to trade the Company securities must notify the Corporate Secretary at least one day in advance to avoid trading the Company securities during the blackout period.

5.4 Report of Changes in Securities Holding

(1) Persons with the duty to report changes to the Company securities holding are those specified under the Securities and Exchange Act, B.E. 2535 (A.D. 1992), the notifications of the Securities and Exchange Commission, other related notifications, and the notifications which will be issued in the future in relation to Preparation of Report on Changes to the securities and Derivatives Holding of Director, Executive, Auditor, Plan Preparer and Plan Administrator, namely;

- (A) Directors
- (B) President and the next four management
- (C) Auditors of the Company
- (D) Spouse or cohabiting couple and minor children of (a) (b) and (c)
- (E) Juristic person wherein oneself and the persons in (a) (b) (c) and (d) hold shares at an aggregate amount exceeding thirty percent of

the total voting shares of such juristic person and such aggregate shareholding is the largest proportion thereof, unless exception is granted by applicable law.

(2) Reporting of Changes in Securities Holding

- (A) Persons with the duty to report changes to the Company securities holding shall prepare and disclose any changes in their holding of the Company securities to the Securities and Exchange Commission in accordance with the Securities and Exchange Act, B.E. 2535 (A.D. 1992) and notifications of the Securities and Exchange Commission. They shall report the changes to the Company securities holding upon purchase, sale, transfer or acceptance of transfer of the Company securities or derivatives, except the cases that shall be exempted from reporting accordance with Clause 6 and Clause 7 of Chapter 2 of Notification of the Office of the Securities and Exchange Commission No. Sor Jor. 38/2561 Re: Preparation of report on changes to the Securities and Derivatives Holding of Director, Executive, Auditor, Plan Preparer and Plan Administrator, detail of which is shown in Attachment 1.
- (B) Persons with the duty to report changes to the Company securities holding shall report changes to their Company securities and derivatives with the Reporting Changes to the Securities and Derivatives Holding Form in accordance with Notifications of the Securities and Exchange Commission via the electronic system within three business days and submit to the Corporate Secretary.

The Corporate Secretary shall keep and report changes to the Board of Directors' meeting.

- (C) The Corporate Secretary is responsible for providing information to the persons with the duty to report changes to the Company securities holding in accordance with notification of the Securities and Exchange Commission regarding preparation of report on changes to the securities holding.

6. Complaints and Whistleblowing

Complaints regarding any offenses against the Inside Information Prevention and the Company Securities Trading Policy shall be submitted to:

- Chairman of the Audit Committee or
- Independent Directors or
- Corporate Secretary

Complainants can submit complaints with document, with specified name, address, telephone number, and e-mail address (if any), to the complaint recipient as the following address:

Address : STP & I Public Company Limited
32/24, Sino-Thai Tower 3rd Floor, Sukhumvit 21 Road,
Klongtoey Nua Sub-district, Wattana District, Bangkok 10110

Telephone : 02-260-1181

e-mail address : contact@stpi.co.th

Complaints and Whistleblowing Procedure

Upon receiving complaints, the Chairman of the Audit Committee, Independent Directors, or the Corporate Secretary shall forward complaints to President for considering the sufficiency of the information. President shall appoint the complaints committee to handle as appropriate on a case-by-case basis and consider the composition of the complaints committee. The complaints committee shall consider complaints, facts, and punishment in the designated period. Result shall be reported to the Board of Directors.

In case a complaint is made against President, the chairman of the Audit Committee shall consider complaint and fact. If there are reasonable grounds to suspect that such acts against the laws or ethics or company policy, the chairman of the Audit Committee will report to the Board of Directors for further consideration and action.

Whistleblower protection policy

The Company will treat the personal data of whistleblowers, complainants, or those who provide cooperation in the investigation, as well as the related information in strict confidence. Any disclosure will be done with discretion and as necessary, basing on the safety and damage concerns of the whistleblowers, complainants, or those who provide cooperation in the investigation, the source of information, and other related persons.

7. Punishment

Punishment in case of violation of this Policy shall be imposed in accordance with Company's regulation or applicable laws.