

(Translation)

## Insider Trading Policy

### SCG Decor Public Company Limited

The Board of Directors Meeting No. 200 (4/2022) held on December 1, 2022 had approved the first Insider Trading Policy, whereafter the Board of Directors Meeting No. 1/2023 held on June 9, 2023 endorsed the continuous use the policy after the conversion into a public limited company.

#### Definitions

SCG Decor refers to SCG Decor Public Company Limited and its subsidiaries according to the consolidated financial statements of SCG Decor Public Company Limited.

Securities refers to securities are listed on the Securities Exchange of Thailand or international Securities Exchange, including but not limited to treasury bills, bonds, bills, shares, debentures, investment units which are instruments or evidence representing the rights to the property of a mutual fund, certificates representing the rights to purchase shares, certificates representing the rights to purchase debentures, certificates representing the rights to purchase investment units, derivative and any other instruments under the Securities and Exchange Act B.E. 2535 (and its amendments) (“**Securities Act**”) or the Office of the Securities and Exchange Commission (“**Office of the SEC**”).

#### Policy

In the operation of SCG Decor, the Company’s directors, executives, employees, and related parties must review and be informed of information that may affect securities prices and cannot be disclosed to shareholders, investors, or the general public. Therefore, the use of insider information requires utmost management to prevent any leakage, misuse, or unfair advantage, which is not only illegal but may also affect the reputation of SCG Decor. For this reason, the Board of Directors has established the Insider Trading Policy in writing for every director, executive, employee and related parties to adopt and communicate accurately.

“Insider Information” refers to the information which has not yet been disclosed to public whose material content could influence changes in securities prices or values of the Company or other listed companies related to Insider Information.

“Securities transaction” refers to purchase, sell, transfer or obtain of securities; or to enter into, purchase or sell derivatives issued by listed companies.

1. SCG Decor is committed to complying with laws relevant to insider trading in every country SCG Decor operates or plans to conduct business.
2. Any director, executive, employee, or any external party who is privy to or is in possession of insider information of SCG Decor through their duties must:

- 2.1 maintain insider information of SCG Decor with due care and safe in order to prevent its leakage.
- 2.2 not disclose insider information whether directly or indirectly 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 such actions may affect the prices or value of securities of SCG Decor's listed companies, or other listed companies related to insider information or may influence investment-related decisions.

3. Any director, executive, employee, or any external party who is privy to or is in possession of insider information through their duties must not purchase or sale securities related to insider information that has not been publicly disclosed, which would create an unfair advantage over other traders who are not aware of such information.
4. Any director, executive, or employee working in the division relating to insider information, including their related persons, must comply with the Blackout Period as prescribed in this policy to prevent them from the risk of wrongful use of insider information.
5. Any director, executive, or person holding an executive position in accounting or finance department whose rank is not lower than departmental manager, including their spouses or cohabiting couples, minor children and juristic persons under the relevant Securities Act, Notifications of the Office of the SEC, and Notifications of the Capital Market Supervisory Board who wishes to engage in a securities transaction has a duty to notify the Company Secretary at least one day before conducting such a transaction. For directors or executives whose spouses or cohabiting couples are also directors or executives of the same listed company, only one person is required to submit a notification.
6. SCG Decor must put in place an internal information management system to prevent any possible leakage and the use of insider information in purchasing or selling securities for private interests or personal interests of others.
7. The directors, executives and employees of SCG Decor have their own duties to strictly comply with their charters, Code of Conduct, Corporate Governance Principles, Delegation of Authority, related disclosure policies of SCG Decor, Guideline for the Use of Inside Information as well as the rules regarding the use of insider information under the "Securities Act" and Public Limited Companies Act B.E. 2535 (and its amendments) and other applicable rules.
8. Any director, executive, or employee of SCG Decor who does not comply with this policy and Insider Trading Guideline is considered breaching of code of conduct and breaking discipline and subject to punishment including those prescribed by laws if it is breach of laws.

### **Blackout Period**

The Company's directors, executives including persons holding executive positions in accounting or finance department whose rank is not lower than departmental manager, as well as employees of the offices relating to insider information, including their spouses, cohabiting couples, and minor children are prohibited from trading securities or entering into derivatives related to the securities of the Company, its listed subsidiaries, listed affiliated companies, or other listed companies related to insider information. This prohibition applies during a period of one (1) month before disclosure of any quarter and annual financial statements and within 24 hours after such disclosure.

Moreover, in cases where the Company's directors, executives, including persons holding executive positions in the accounting or finance department whose rank is not lower than departmental manager, as well as employees of the offices relating to insider information, including their spouses, cohabiting partners, and minor children, are privy to insider information that may affect the prices or values of the securities of the Company, its listed subsidiaries, listed affiliated companies, or other listed companies related to insider information, they are prohibited from trading the securities of said companies until 24 hours after the disclosure of all such insider information to the public.

### **Reporting on Holdings and Changes to Holdings of Securities and Derivatives**

1. The Company will provide knowledge to the Company's directors and executives, including persons holding executive positions in the accounting or finance department whose rank is not lower than departmental manager, regarding their duties related to preparing, disclosing, and submitting reports on their holdings and changes to the holdings of securities and derivatives. This includes the holdings and changes to the holdings of their spouses, cohabiting partners, and minor children, as well as the holdings and changes to the holdings by a juristic person wherein the board of directors, executives of the Company, their spouses, cohabiting couples, and minor children hold shares at an aggregate amount exceeding 30 percent of the total voting shares of such juristic person, and such aggregate shareholding is the largest proportion thereof. These reports must be submitted to the Office of the SEC in accordance with the Securities Act, Notifications of the Securities and Exchange Commission, and applicable notifications of the Capital Market Supervisory Board, including any relevant punishments according to applicable laws.
2. The Company's directors and executives, including persons holding executive positions in the accounting or finance department whose rank is not lower than departmental manager, must declare their intention to conduct a securities transaction. They must also prepare, disclose, and submit reports on the holdings and changes to the holdings of their securities and derivatives, as well as the holdings and changes to the holdings of their spouses, cohabiting couples, and minor children, including juristic persons under the Securities Act, Notification of the Securities and Exchange Commission, and applicable Notification of the Capital Market Supervisory Board. These reports should be submitted to the Company Secretary before every submission to the Office of the SEC, following the prescribed procedures:

- 2.1 At least one business day in advance of conducting any securities transaction, the aforementioned persons shall declare their intention to the Company Secretary, by way of telephone, e-mail, or any other mean. They may consider submitting the Declaration of Intention to Purchase and Sell the Company's Securities Form, and may also declare their intention to conduct a securities transaction issued by the Company's listed subsidiaries.
- 2.2 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 names of the persons with the duty to report are not listed in the Office of the SEC's Directors and Executives Information System, or within three (3) working days in accordance with 2.3.
- 2.3 In the case where the names of the persons with the duty to report are listed in the Office of the SEC's Directors and Executives Information System, and in any case other than 2.2, the reporting shall be in accordance with the following regulations:
- 1) Within three (3) working days from the date of purchase, sale, transfer, or acceptance of transfer of securities or derivatives worth more than 3 million baht.
  - 2) For securities or derivatives worth less than 3 million baht, the reporting can follow any of the following regulations:
    - 2.1) Within three (3) working days from the date of purchase, sale, transfer, or acceptance of transfer.
    - 2.2) Accumulate every purchase, sale, transfer or acceptance of transfer with a total worth of 3 million baht within six (6) months from the date of the first transaction, and report within three (3) working days from the date that the accumulated value reaches 3 million baht.
    - 2.3) Within three (3) working days from the date that marks six (6) months since the first transaction, despite the accumulated value less than 3 million baht.
- 2.4 In case the Company's directors or executives conduct transactions, prepare, disclose, and submit the reports on holding and changing of holding of their securities and derivatives, and their spouses or cohabiting couples are also directors or executives of the same listed company, only one person is required to report.

**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 CEO and President or the Chief Finance Officer or authorized persons only.

Amended with effect from July 23, 2024

By the resolution passed at the Board Meeting of SCG Decor Public Company Limited on July 23, 2024