



## **Insider Information Management and IT Governance Policy**

### **SCG PACKAGING PUBLIC COMPANY LIMITED**

#### **Insider Information Management Policy**

To operation SCG Packaging Public Company Limited (“the Company”), any director, executive, employee and engaged person 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 the Company. Therefore the Board of Directors of the Company approved the Insider Information Management and IT Governance Policy 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. The Company 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 the Company and other person working with the Company who accesses or possesses insider information must:
  - 2.1 maintain insider information of the Company with due care and safe in order to prevent its leakage.
  - 2.2 not disclose insider information of the Company 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 other listed companies relating to insider information or influence investment decision.

3. Any director, executive, employee of the Company and other person working with the Company 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. The Company 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 the Company have their own duties to strictly comply with their charters, code of conduct and corporate governance handbook of the Company 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 the Company 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 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 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 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 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 or the Chief Financial Officer or authorized persons only.

### **IT Governance Policy**

The Company emphasizes on utilizing information technology system efficiently and safely by stating its e-policy as approved by the Chief Executive Officer or the IT Director or designated person including provision of security protection measures for computer and information system as follows:

1. Using computer and information technology of the Company in accordance with the Computer-related Crime Act and other applicable laws.
2. Limiting assessment to insider information to only the Chief Executive Officer, the Chief Financial Officer, the Company Secretary and the Management in relevant organization structure and disclosing to the Company's employees on necessity basis and informing the Company's employees of the confidentiality and limitation of use of the information.

3. Not changing, copying, deleting or destroying information of the Company and not disclosing information in the system of the Company without permission from the Company.
4. Implementing security system to prevent assessment and usage of information folder and confidential documents.
5. Using information technology system correctly according to permitted rights, keeping and not allowing other person using password to access the information technology system.
6. Not using information technology system to access or send information having content immoral, relating to gambling, affecting national security or violating other person's rights.
7. Communicating through social media must be made appropriately, accurately and truly as well as considering fairness to all stakeholders and not incurring damage to the Company by strictly following brand communication guidance and social media policy as approved by the Chief Executive Officer.

This Policy shall be effective from December 1, 2020.

**Announced on December 1, 2020.**

*-Signed by-*

**(Mr. Prasarn Trairatvorakul)**

**Chairman of the Board of Directors**