



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

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

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

In the operation of SCG Packaging Public Company Limited (“the Company”) and its subsidiaries; 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 the Company. The Board of Directors of the Company has thus approved the formulation of the Insider Information Management and IT Governance Policy for every director, executive and employee of the Company to adopt and communicate accurately.

#### **Definitions**

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

Securities means securities 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, derivatives 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 SEC**”).

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

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

#### **Policy**

1. SCG Packaging is committed to complying with laws relevant to insider trading in every country SCG Packaging operates or plans to conduct business.
2. Any director, executive, employee of SCG Packaging, and any external party who is privy to or is in possession of insider information of SCG Packaging through their duties must:
  - 2.1 maintain insider information of SCG Packaging with due care and safe in order to prevent its leakage.

2.2 not disclose insider information of SCG Packaging 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 the securities of SCG Packaging's listed companies or other listed companies related to the insider information or may influence investment-related decisions.

3. Any director, executive, employee of SCG Packaging, and any external party who is privy to or is in possession of insider information through their duties, or have positions or is in the line of work relating to insider information, must not purchase or sale securities or enter into derivative contracts related to securities of which insider information has not been publicly disclosed, except in the case that such act would not create an unfair advantage over others as specified by the Office of SEC.
4. Any director, executive and employee working in the division relating to insider information, including the spouses or cohabiting couple and minor children of those provided with access 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. In case the Company's directors, executives, and persons holding an executive position in accounting or finance at a divisional manager or equivalent level, including their spouses or cohabiting couple, minor children and juristic persons under the relevant Securities Act, Notifications of the Office of SEC, and Notifications of the Capital Market Supervisory Board, wish to engage in a securities transaction, it is in their duty to notify the Company Secretary at least one day before conducting such a transaction. For the directors or executives whose spouses or cohabiting couple are also directors or executives of the same listed company, only one person is required to submit a notification.
6. SCG Packaging 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.
7. The directors, executives and employees of SCG Packaging have their own duties to strictly comply with their charters, SCG Packaging's Code of Conduct and SCG Packaging's Corporate Governance Handbook, the Delegation of Authority, and Disclosure Policy of SCG Packaging, guidelines for the use of inside information under the Securities Act and Public Limited Companies Act B.E. 2535 (and its amendments) and other applicable rules.
8. Any director, executive and employee of SCG Packaging who does not comply with this policy is considered breaching of code of conduct and breaking discipline which are 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 or enter into derivative contracts relating to securities of the Company or the Company's listed subsidiaries or associate companies 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, 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 of the Company or the Company's listed subsidiaries or associate companies 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 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 declare their intention to conduct a securities transaction, 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 submission to the Office of SEC in a form, as follows:
  - 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 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 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 bath 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 couple 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 the 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 Insider Information Management and IT Governance Policy was revised according to the resolution of the meeting of the Board of Directors on October 29, 2024, and effective from October 29, 2024, onwards.

**Announced on October 29, 2024.**

*-Signed by-*

**(Mr. Prasarn Trairatvorakul)**

**Chairman of the Board of Directors**