



KCE Electronics Public Company Limited

Use of Inside Information Policy



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Use of Inside Information Policy

1. Introduction

KCE Electronics Public Company Limited (“the Company”) recognizes and understands the importance of governing the use of inside information in accordance with the principles of good corporate governance, adhering to integrity, honesty, ethics, and morality in business operations. The Company has established a Use of Inside Information Policy to prevent directors, executives, and employees from using the Company's inside information for personal gain or disclosing it to others, including for securities trading purposes. The Company also adheres to the regulations set by the Securities and Exchange Commission such as the reporting of securities transactions by directors and executives, the Company has developed a Use of Inside Information Policy to ensure compliance going forward.

2. Objectives

The Company has developed a formal “Use of Inside Information Policy” with the following objectives:

- 2.1 To establish criteria and guidelines regarding securities trading by directors, executives, and employees of the Company.
- 2.2 To ensure that directors, executives, and employees of the Company comply with the Securities and Exchange Act B.E. 2535 and other announcements related to securities trading using inside information.
- 2.3 To build confidence among shareholders and investors in the Company's securities.

3. Scope

- 3.1 This policy applies to the Board of Directors, Executives and employees of the Company. In addition, some parts of the policy also extend to the spouses and minor children of the individuals mentioned.
- 3.2 This policy covers the confidentiality, retention of inside information, and securities trading of the Company.

4 Definition according to Use of Inside Information Policy

- 4.1 *Securities*¹ means shares or convertibles
- 4.2 *Convertibles* means securities subject to any of the following rules and conditions;
 - (1) debt repayment may be converted into settlement of shares issued by the listed company
 - (2) the securities holder shall have the right to buy shares issued by the listed company

¹Refer to The Notification of the Office of the Securities and Exchange Commission No. Sor Jor. 6/2567

(3) the right to gain returns shall be based on the price or the returns from shares issued by the listed company

4.3 *Trading* means buying, selling, transferring, or receiving transfer of securities and/or any legal benefits in the securities, including the exercise of the right to purchase shares or the rights under warrants to purchase shares or bonds.

4.4 *Inside Information* means any fact which is material to the change in the price of securities and has not yet been disclosed to the public. Examples of inside information include:

- a) Financial position and financial performance
- b) Financial forecasts
- c) Payment or non-payment of dividends
- d) Changes in par value of securities
- e) Redemption of securities
- f) Significant changes in investment plans or investment projects
- g) Joint ventures, mergers or business sales
- h) Making a tender offer for another company's securities
- i) Purchase or sale of significant assets
- j) Acquisition or loss of significant commercial contracts
- k) Significant legal disputes
- l) Change in the Company's objectives
- m) Significant changes in accounting policies
- n) Change in control or significant change in the Board of directors or senior executives

4.5 *Executives*² means manager and the following individuals:

- (1) The person holding the highest executive position in each department, starting from the manager downwards, in the case of a listed company with shares traded on the stock exchange.
- (2) The first four positions within the Company, starting from the manager downward, and those holding positions equivalent to the fourth-level executive, as well as those in managerial positions in accounting or finance at the department manager level or equivalent, in the case of a listed company other than the company mentioned in (1).

5. Roles and Responsibilities

5.1 The Board of Directors has assigned the Managing Director to oversee this policy to ensure that the individuals, designated by the Company, comply with the criteria and guidelines for securities trading as established by the Company.

²Refer to The Notification of the Office of the Securities and Exchange Commission No. Sor Jor. 6/2567

- 5.2 The Company Secretary is responsible for implementing this policy, as well as monitoring its effectiveness, providing explanations, answering inquiries, and interpreting the policy in cases of doubt.
- 5.3 Executives are responsible for ensuring that their subordinates recognize the importance of, understand, and strictly adhere to this policy.
- 5.4 Directors, executives and employees must strictly adhere to this policy, as well as communicate this policy to their spouses and minor children.

6. Policies and Procedures

The Company establishes the Use of Inside Information Policy as follows:

- 6.1 The Company will educate its directors and executives on the obligation to prepare and disclose reports on securities holding and the change thereof of (a) themselves, (b) their spouses or cohabiting couples (c) minor children and (d) juristic person in which the directors or executives, his or her (b) and (c) collectively hold shares more than 30 percent of the total voting rights, provided that such aggregate shareholding is considered the largest shareholding in such juristic person. The reports shall be disclosed to the Office of the Securities and Exchange Commission in accordance with Section 59 of the SEC Act and the penalty regarding Section 275 of the SEC Act. The Company shall also educate its directors and executives on the reports on acquisition or disposal of securities in accordance with Section 246 of the SEC Act.
- 6.2 The Company requires directors and executives to prepare and submit reports on their securities holdings, as well as the holdings of their spouses or cohabiting partners, minor children, and legal entities in which the directors, executives, their spouses or cohabiting partners, and minor children hold more than 30 % of the total voting rights of the entity, according to the specified securities holdings report format, to the company secretary before submitting to the SEC. They must prepare and submit their securities holdings report within 30 days from the date they are appointed to the position of director and/or executives, and whenever there is a change in their securities holdings. They must also report any changes in securities holdings within 3 business days from the date of purchase, sale, transfer, or receipt of transfer of the securities. The Company secretary is required to summarize the securities holdings report and any changes in securities holdings for presentation to the Board of Directors for acknowledgment every 6 months.
- 6.3 The Company requires directors and executives to notify the Company Secretary at least 1 day in advance of their intention to conduct any trading of the Company's shares. Directors and executives are also required to report any changes in their securities holdings to the Securities and Exchange Commission (SEC) in accordance with Section 59 of the Securities and Exchange Act and within the timeframe prescribed under Notification Sor Jor. 6/2567, by submitting such report within 3 business days from the date on which the change in securities holdings occurs. However, in cases

where the value of each transaction is less than THB 3 million, the reporting may be made within 3 business days from the date on which the cumulative transaction value reaches THB 3 million, or upon the lapse of 6 months from the date of the first transaction, whichever occurs earlier. Directors and executives shall also inform the Company Secretary accordingly, in order for the Company Secretary to record such changes and prepare a summary of securities holdings of directors and executives on an individual basis for submission to the Board of Directors at the next Board meeting. In addition, directors and executives shall be informed of the penalties applicable in the event of any violation or non-compliance with the foregoing requirements.

- 6.4 The Company prohibits directors, executives, employees, and workers of the Company who have access to the Company's inside information from disclosing or using the Company's secrets and/or business information for personal gain or for the benefit of others. This includes using such information to buy or sell, offer to buy or offer to sell, or solicit others to buy or sell the Company's securities. Additionally, these individuals must not disclose such information to others who may use it for similar purposes, especially competitors, whether directly or indirectly, and regardless of whether they receive compensation. This also includes using such information to engage in business that competes with the Company or its subsidiaries.
- 6.5 The Company requires that directors, executives as well as individuals holding managerial positions in accounting or finance departments at the level of department director or equivalent, and relevant employees, including their spouses and minor children, who have access to significant inside information that may affect the price of the Company's securities, must suspend trading of the Company's securities during the period before the financial statements are disclosed or information regarding the Company's financial position and status is made public, until the Company has disclosed the information to the public. The Company will notify directors and executives as well as individuals holding managerial positions in accounting or finance departments at the level of department manager or equivalent, to suspend buying, selling, offering to buy, offering to sell, or soliciting others to buy, sell, offer to buy, or offer to sell the Company's securities, either directly or indirectly, and regardless of whether the actions are for their own benefit or for others' benefit. This suspension will apply for at least 30 days prior to the disclosure of information to the public and for at least 24 hours after the Company's inside information has been publicly disclosed. Individuals with access to this inside information must not disclose it to others.
- 6.6 The Company prohibits directors, executives, employees, and workers of the Company, or former directors, executives or employees who have resigned, from disclosing inside information or the Company's secrets, as well as confidential information of the Company's clients that they have become aware of through the performance of their duties, to external parties. This prohibition applies even if the disclosure of such information may not result in harm to the Company or its clients.
- 6.7 Directors, executives and employees of the Company, or former directors, executives, employees, or former employees who have resigned, have the duty to maintain the confidentiality of the Company's inside information. They are obligated to use the Company's inside information solely for the purpose of conducting the Company's business. It is prohibited for directors, executives and

- employees of the Company to use the Company's confidential or inside information for the benefit of other companies in which they are shareholders, directors, executives, employees, or workers.
- 6.8 The company has measures in place to prevent the misuse of inside information by restricting access to information that has not yet been disclosed to the public. Only those who are involved and necessary are allowed to access it. Additionally, a system for securing inside information is implemented, with data owners ensuring that all relevant personnel strictly adhere to these measures.
- 6.9 The disclosure of information must be carried out by Company's personnel who have the authority and responsibility. General personnel do not have the duty to disclose information. When asked to disclose information that is not within their responsibility, they should advise the inquirer to consult the person responsible for disclosing that information, in order to ensure that the information provided is accurate and consistent.
- 6.10 The Company requires directors, executives, and employees to strictly comply with the guidelines on the use of inside information as prescribed under the Securities and Exchange Act, as well as all other relevant rules and regulations.
- 6.11 The Company considers any actions that violate the Use of Inside Information Policy, unauthorized disclosure of information, which causes damage to the Company and related individuals, as an offense subject to disciplinary action according to the Company's work regulations. The Company will consider penalties appropriate to the situation, ranging from a warning to termination of employment, as well as legal liability.

7. Review of Policy

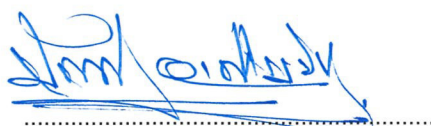
The review of this policy is set for at least once a year is to be submitted to the Board of Directors for approval.

This Use of Inside Information Policy is effective from 11 November 2025 onwards.



(Mrs. Siriphan Suntanaphan)

Chairman of the Corporate Governance
and Sustainability Committee



(Mr. Bancha Ongkosit)

Chairman of the Board of Directors