

Insider Trading Policy: 3rd Revision

The Siam Cement Public Company Limited

The Board of Director Meeting of The Siam Cement Public Company Limited No. 217 (6/2017) held on November 1, 2017 has approved the first Insider Trading Policy in order to ensure that SCG and SCG employees can accurately and fully comply with the policy concerning this matter.

In the operation of SCG, 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.

As SCG has several guidelines on insider information management across various documents, such as SCG Code of Conduct, SCG Corporate Governance Principle, SCG Employee Regulations, and other compliance measures, and in 2017, the Board of Directors has approved the compilation of relevant practices and guidelines and the formulation of this insider trading policy in writing for every SCG director, executive, and employee to adopt and communicate accurately.

Definitions

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

Securities means 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 SEC**”).

Insider Information means the information which has not yet been disclosed to public whose material content could influence changes in securities prices or values.

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 is committed to complying with laws relevant to insider trading in every country SCG operates or plans to conduct business.
2. Any SCG director, executive, employee, or any external party who is privy to or is in possession of insider information through their duties:
 - 2.1 maintain insider information of SCG with due care and safe in order to prevent its leakage.
 - 2.2 not disclose insider information of SCG 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's listed companies or other listed companies related to the 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 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 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 have their own duties to strictly comply with their charters, SCG Code of Conduct, SCG Corporate Governance Principles, Delegation of Authority, related disclosure policies of SCG, Guideline for the Use of Inside Information as well as the rule of using “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 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 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 one (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 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 submitting to the Office of SEC in a form and within the following periods and in compliance with the following 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 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 public including communicating any information relating to insider information must be agreed by the President & CEO or Vice President-Finance and Investment & CFO or authorized persons only.

According to the resolution of the Board Meeting on May 29, 2024

Air Chief Marshal *-signed-*

(Satitpong Sukvimol)

Chairman of the Board of Directors

Note:

- * The first amendment to this Insider Trading Policy was made pursuant to the resolution of the Board of Directors Meeting No. 256 (5/2022) on July 27, 2022
- * The second amendment to this Insider Trading Policy was made pursuant to the resolution of the Board of Directors Meeting No. 265 (6/2023) on July 26, 2023
- * The third amendment to this Insider Trading Policy was made pursuant to the resolution of the Board of Directors Meeting No. 272 (4/2024) on May 29, 2024