

Insider Trading Policy

Group

Framework

The Insider Trading Policy comprises of:

1. Objective
2. Scope
3. Definitions
4. Responsibilities
5. Policy Directives
6. Compliance and Consequence for Non-Compliance
7. Policy Measurement Metrics
8. Policy Exemptions
9. Reference

Annex 1: Document Approval and Version History

Annex 2: Common Terms

Annex 3: Workflow

1. Objective

This Insider Trading Policy is established to ensure that Siam City Cement Public Company Limited (“the Company” or “SCCC”) and its Subsidiaries directly and indirectly held (collectively called the “Group”) are in compliance with statutory and regulatory requirements when dealing with the securities of SCCC. It also aims to communicate the same to Relevant Person(s) who may know or obtain any knowledge in relation with any non-public information and information which may be sensitive to SCCC securities and business.

2. Scope

This Policy applies to all employees, management, directors as well as any person who represents or performs work on behalf of any entity under the Group.

3. Definitions

Securities	Include common share, preferred share, warrant, transferable subscription right, convertible debentures, derivatives warrant, NVDR (Non-Voting Depository Receipts) or other types issued by SCCC, in accordance with the Thai Securities and Exchange Act.
Material Information	is information that has a substantial likelihood that a reasonable investor would consider it important in making an investment decision, or if it is reasonably certain to have an effect on the price, whether it is positive or negative, of SCCC's Securities, including information that makes the Company obligated to provide information to the Stock Exchange of Thailand in response to certain occurrences under the Stock Exchange of Thailand's regulations, as indicated in reference document No. 9.
Non-public Information	is information that has not been made publicly available to investors in general. This includes information received from sources or in circumstances indicating that the information has not been publicly circulated.
Insider Person	is generally referred to a person who possesses material information and non-public information about the Group and who has a duty to the Group to keep such information confidential
Relevant Person(s)	is referred to all employees, management and directors of the Group, as well as any person who represents SCCC or performs work on behalf of SCCC and/or its Subsidiaries, including Insider Person who are subject to this Policy.
Insider Trading	is generally referred to the use of material information and non-public information to trade securities or the communication of material information and non-public information to others who may trade on the basis of such information or for his/her or other benefit which cause damage to SCCC.
Blackout Period	is duration of time when the Relevant Person are restricted from buying or selling securities of SCCC for a minimum period of 30 days before the disclosure or announcement of the financial statements and 24 hours after the disclosure or announcement of the financial statements or other period notify by the Company Secretary.

4. Responsibilities

The Company Secretary shall notify the Blackout Period for each quarter to the Relevant Persons based on the schedule of SCCC's Board of Directors Meeting.

The Human Resources Function of each Group Company in Thailand shall provide the Company Secretary with a quarterly updated list of Relevant Persons, as confirmed by the appropriate management based in Thailand. In the case of overseas Group Companies, the Company Secretary shall contact Human Resources in each country to update the list of Relevant Persons.

The Legal Department, upon request from relevant function, shall request that any external third party who has access to the Group's Material Information sign a confidentiality agreement and retain such documentation.

The Group Internal Audit and Compliance is responsible for informing and communicating with relevant personnel of Group Companies through the Learning Management System. This includes matters such as acceptance to comply with the Insider Trading Policy.

All Relevant Persons shall be responsible for strictly complying with this Policy. Thus, they shall be ethically and legally obligated to maintain the confidentiality of information of the Group and not to trade SCCC securities, while in possession of material and non-public information.

The Relevant Persons who receive the notification of the Blackout Period shall extend such notification to other Relevant Person(s) who is/are not included in the distribution list of the Blackout Period.

5. Policy Directives

5.1 Directives relating to trading

In general, the Relevant Persons of the Group are entitled to subscribe, purchase and sell SCCC securities.

- a) The Relevant Persons of the Group shall not trade SCCC securities, unless they are certain that they do not possess material and non-public information.
- b) The Relevant Persons of the Group shall not trade SCCC securities, directly or indirectly through the family members or other members in a person's household and entities controlled by them, unless they are certain that he or she does not possess material and non-public information.

As a preventive measure, the Company Secretary shall determine the Blackout Period and notify to the Relevant Person. Such Relevant Person shall not subscribe, purchase, and sell SCCC securities in that period.

The above restriction in dealing with SCCC securities shall be applicable when the Relevant Person as mentioned above is involved with non-public information such as the confidential project preparation which is not yet disclosed publicly. SCCC and/or the Relevant Persons shall fully comply with the securities law and the SCCC Code of Business Conduct.

5.2 Directives relating to Non-public Information

The Relevant Persons of the Group shall not disclose material and non-public information to others, who have no reason for receiving such information and to their family members or other members in a person's household and entities controlled by them. The Relevant Persons should sign the confidentiality agreement as provided under this Policy.

If any information is or may be considered "Material Information" or "Non-public Information" for communication within the Group, the department responsible for disseminating such information shall consult with the Company Secretary prior to communicating. This is to determine whether the Company is required to submit such information to the Stock Exchange of Thailand before discussing it within the group.

The person in charge of the relevant function together with the Company Secretary shall ensure that the Company complies with the Disclosure Rule of the Stock Exchange of Thailand.

6. Compliance and Consequence for Non-Compliance

All entities and their employees, management, directors as well as any person who represents or performs work on behalf of any entity under the Group shall ensure full compliance with this Policy. They are expected to assure that appropriate resources are available. Reviews are always regularly undertaken to ensure that the implementation and application of this Policy remain robust.

Anyone who breaches this Policy shall be subject to disciplinary action and penalty under the Section 241 of the Securities and Exchange Act B.E. 2535 that prohibiting insider trading (Penalty is imprisonment up to 2 years, or fine up to 2 times of benefit received but not less than THB 500,000 or both fine and imprisonment).

7. Policy Measurement Metrics

Not Defined.

8. Policy Exemptions

No exceptions are permitted.

This Policy may be amended in accordance with any changes in law and regulation issued by The Authority on the subject.

Variations to this Policy shall be reviewed by the Document Manager and proposed to the Document Owner prior to submitting to the Board of Directors for approval.

Buying SCCC securities under the Employee Joint Investment Program (EJIP) scheme whereby securities can be scheduled to be bought on a fixed day in advance on a monthly basis is not restricted during this "Blackout Period".

9. Reference

- 9.1 Code of Business Conduct
- 9.2 Securities and Exchange Act B.E. 2535
- 9.3 Regulation of the Stock Exchange of Thailand Re: Rules, Conditions and Procedures Governing the Disclosure of Information and Other Acts of a Listed Company B.E. 2560 (Bor.Jor./Por. 11-00)

- End of the document -