

Insider Trading Policy

Group

Framework

The Insider Trading Policy comprises the following sections:

1. Objective
2. Scope
3. Definitions
4. Responsibilities
5. Policy Directives
6. Compliance and Consequences for Non-Compliance
7. Policy Measurement Metrics
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Annex 1: Document Approval and Version History

1. Objective

The Insider Trading Laws prohibit trading in securities on the basis of inside information and sharing of such information with third parties. As such, the Insider Trading Policy is established to ensure that Siam City Cement Public Company Limited (“the Company” or “SCCC”) and its subsidiaries (“Group Companies”), whether directly and indirectly held (collectively referred to as “the Group”) comply with rules and regulations relating to trading of the Company’s securities. In addition, the Policy is conceived as a means to communicate with all insider persons on the Company’s practice guideline in relation to inside information that may affect the trading in securities of the Company and the Group Companies that are listed under the Stock Exchange of Thailand (SET.)

2. Scope

This Policy applies to all Employees, Management, and Directors, as well as any person who represents or performs work on behalf of any entity within the Group. However, Group Companies listed under the SET that are compliant with the SET’s rules and regulations may continue their use of their existing insider trading policies, provided that their insider trading policies are aligned with this Insider Trading Policy.

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 the Company and Group Companies listed under the SET, in accordance with the Thai Securities and Exchange Act.
Inside Information	is material information which a reasonable investor would consider important when deciding to buy, sell or hold the securities and is still non-public information, or the information which the Company is required to disclose to the SET, per the disclosure regulations of the SET.
Insider Person	refers to a person who possesses the inside information. This includes Directors, Executives, employees, or representatives of the Group, holding a position or having a responsibility which allows access to the inside information, as well as those whose duties involve the access to or the handling of the inside information.
Using the inside information in breach of the Policy	refers to using the inside information to trade securities or to disclose the inside information to other persons either directly or indirectly, wherein these persons may use such inside information to trade securities for their own or others' benefit.
Blackout Period	is the duration of time when an Insider Person is restricted from buying or selling the Securities 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 notified by the Company Secretary of SCCC

4. Responsibilities

The Human Resources Function of each Group Company shall provide the Company Secretary of SCCC with an up-to-date quarterly list of Insider Persons, as confirmed by the appropriate management.

The Company Secretary of SCCC shall monitor the compilation and updating of the list of Insider Persons and notify all Insider Persons the periods in each quarter wherein trading of Securities is forbidden, based upon the Company's Board meeting schedule. The Company Secretary of SCCC is also responsible for communicating with and providing training to the Company's Directors and its subsidiaries' Directors in the matter of insider trading.

The Group Internal Audit and Compliance is responsible for launching training and communicating with all insider personnel, including employees and Executives, through the company's learning platform. This platform also serves as a tracking system that records employees' and Executives' acknowledgment of the policy, which is considered equivalent to signing a Confidentiality Agreement.

Insider Persons (who are on the list of Insider Persons or otherwise) have the duty to comply to this Policy to the best of their ability and have the moral and legal obligation to safekeep the Group's Inside Information and to refrain from trading the Securities of the Company and the Group Companies so long as they are in possession of the Inside Information. All Insider Persons also have the duty to notify others who may not be on the notification list of any imminent Blackout Period, such that every Insider Person is informed.

5. Policy Directives

5.1 Directives relating to trading of the Securities

An Insider Person is forbidden from:

- 1) Trading the Securities or entering into futures contracts either for their own benefit or that of others, unless
 - a) The action is in full compliance with the law, a court order, or an order from a legal authority
 - b) The futures contract was entered into prior to the insider person being aware of or being in possession of insider information
 - c) It is an action that the insider person is not aware of or an action that is not a decision by the insider person, but has delegated a permitted or registered fund or investment manager to make a decision on buying or selling of securities, or entering into futures contracts relating to such securities, or
 - d) It is an action that is not considered unfair according to the Securities and Exchange Commission (SEC)
- 2) With the assumption that the person is aware of the potential that insider information may be used in relation to securities trading or entering into futures contracts for self-benefit or the benefit of others, disclosing insider information to others either directly or indirectly, unless the action is not considered unfair according to SEC.

Directors and Executives of SCCC have the duty to notify the person designated by the Chairman of the Board of Directors or the Company Secretary of SCCC at least one day prior to trading securities.

5.2 Directives relating to protection of non-public Information

Employees, Executives, and Directors all have the duty to safekeep confidential information and information yet to be disclosed to the public, as dictated the Group's Code of Business Conduct.

Any potential communication of the Inside Information must be consulted with the Company Secretary of SCCC first before the communication to determine whether such information is required to be disclosed to SET's platform prior to being publicly communicated.

The highest-level Executives of all entities within the Group and the Company Secretary of SCCC have the duty to oversee disclosure through SET's platform as is legally obligated.

6. Compliance and Consequences for Non-Compliance

All entities within the Group, including their Employees, Management, and Directors, as well as any individuals who represent or perform work on behalf of the Group, must fully comply with this Policy. They are also responsible for ensuring that appropriate resources are allocated to support its effective implementation. Regular reviews will be conducted to ensure that the implementation of the Policy remains robust, suitable, and effective.

Any individual who breaches this Policy may be subject to disciplinary action, up to and including dismissal or termination of employment.

7. Policy Measurement Metrics

Not Defined.

8. Policy Exemptions

No exceptions are permitted.

This Policy shall be reviewed and amended as necessary to comply with any changes in laws and regulations issued by the authority on the subject.

Variations to this Policy shall be reviewed by the Document Manager and proposed to the Document Owner before submission 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. References

- 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)

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