



## Inside Information Policy

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P.S.P. Specialties Public Company Limited

## Inside Information Policy

PSP Specialties Public Company Limited (the “Company”) and its subsidiaries and trading partners (“Group”) reinforce IIP guidelines under strict Company Compliance Policy (CCoP) prohibiting and preventing any Group personnel or anyone from insider trading—the use or disclosure of any non-public inside information in any way that may affect or change the price or value of Group securities, including trading securities on the stock exchange or entering into a related futures contract, albeit harmful, harmless, or beneficial, directly or indirectly, to either the Group or anyone else.

The Group implements the following plans under IIP guidelines to prevent insider trading:

1. Establish an Internal Control system for preventing inside information leakage by setting and reviewing appropriate procedures and measures in writing for all Group personnel to acknowledge and follow when handling inside information.
2. Limit the number of personnel with inside information access to a need-to-know basis minimum and ensure that all Group personnel with authorized access are aware of their responsibility in maintaining confidentiality as a professional representing the Group.
3. Designate a responsible person as the central agent for disclosing any Group information to the public.
4. Assign the Internal Audit Unit to monitor the implementation of measures and procedures in item 1. and report to the Audit and Corporate Governance Committee quarterly.
5. Secure a confidentiality agreement from anyone, including a third-party consultant, contractor, or service provider, before authorizing access to transact with any material involving inside information. The person authorized access must meet Group Internal Control system requirements to effectively prevent inside information leakage.
6. Group personnel are prohibited from insider trading or disclosing any inside information of a Group partner ascertained through conducting business on the Group's behalf, albeit directly or indirectly harmless, harmful, or beneficial to the Group or anyone else. Such information can only be applied on behalf of the Group for the originally intended operational purposes.
7. Foster a professional corporate culture and train Company directors and executives on their professional duty to prepare and submit the Stakeholding Report, i.e., a report declaring current holdings and changes of securities and derivatives along with any acquisition or disposition of securities of themselves

and that of legally recognized family members, including their spouse, cohabitant as husband or wife, or adopted children ("Family Stakeholder"), including a juristic person with a Family Stakeholder that is Company personnel, of whom together hold shares in aggregate exceeding 30 percent of the total number of voting rights of the juristic entity. The Stakeholdings Report is submitted to the Office of the Securities and Exchange Commission ("SEC") under Sections 59 and 246, and the penalty provisions under Sections 275 and 298 of the Securities and Exchange Act B.E. 2535 and Amendments ("Securities Act"). A copy of the report is submitted to the Company Secretary the same day the report is submitted to the SEC Office.

8. Company directors and executives are obligated to prepare and disclose their reports, including that of Family Stakeholders, if any, to the SEC Office per Section 59 of the Securities Act and related notifications, and submit a copy of the report to the Company Secretary on the same day the report is submitted to the SEC Office.
9. The term "executive" in Clause 7. and Clause 8. above is defined under the Securities Act announcement Section 59. All directors, executives, employees, and temporary employees of the Group, or Group personnel, former and existing, have a duty to uphold and protect Group inside information and use it on the Group's behalf for the originally intended purposes only, where insider trading, knowingly or on a should-know basis that the recipient may use that information for unintended purposes, is strictly prohibited.
10. Require Group personnel with involvement or access to Group financial statements or any inside information to refrain from (i) trading Group securities for a period of 30 days prior to the public disclosure of the information and (ii) disclosing such information for a period of 24 hours thereafter or until it has been formally communicated to SEC.
11. Regard any violation of the above rules as a disciplinary offense under Group bylaws and Human Resource Management Regulations and consider appropriate disciplinary action or punishment, or both, depending on the intent of the action, and damage or loss incurred. Disciplinary action can range from verbal warning, written reprimand, suspension, and possibly termination of employment per relevant guidelines, under the Company Code of Conduct

This Inside Information Policy (IIP) is approved by the Board of Directors and is effective from the 19<sup>th</sup> of December 2023, onwards.