

# Information Disclosure Policy

## Symphony Communication Public Company Limited

### (Revised Edition 2025)

*(Approved by the resolution of the Board of Directors' Meeting No. 6/2025 held on 14 November 2025 and takes effect from 14 November 2025 onwards.)*

# Information Disclosure Policy

## 1. Significance

Symphony Communication Public Company Limited (hereinafter referred to as “**the Company**”) is committed to ensuring compliance with all applicable laws, rules, and regulations related to the disclosure of its information. The Company places great importance on accurate, complete, transparent, and verifiable disclosure of both financial and non-financial information, ensuring that all stakeholders and relevant parties receive information equally.

## 2. Objective

This Information Disclosure has been established to serve as a guideline for the Company’s information disclosure practices, ensuring that all disclosures are accurate, complete, transparent, equitable, and in compliance with relevant laws, regulations, and requirements. The objective is to provide shareholders, investors, regulators, and all stakeholders with appropriate, timely, and reliable information, thereby enhancing transparency, accountability, and confidence in the Company’s business operations.

## 3. Scope

1. This Information Disclosure Policy shall apply to all information disclosed by the Company and its subsidiaries, including financial and other material information, through all official disclosure channels utilized by the Company; and all personnel of the Company and its subsidiaries are required to comply strictly with this Policy.
2. Information disclosures relating to public relations activities, such as product and service promotions, marketing campaigns, sales promotions, or corporate social and environmental responsibility (CSR) activities, are not subject to this Policy.

## 4. Definitions

Personnel	refer to	the Company’s directors, executives, and employees, including consultants, representatives, authorized persons, workers, or any other individuals who perform work on behalf of or act in the name of the Company.
Subsidiary	refers to	a company having any of the following characteristics: (1) a limited company or a public limited company in which the Company owns or holds, directly or indirectly, more than fifty percent (50%) of the voting shares; or (2) A limited company or a public limited company over which the Company has the power to control the financial and operating policies in order to

		obtain benefits from the activities of such company or legal entity.
Information	refers to	data that have been collected, processed, analyzed, and refined so as to possess meaning and be capable of being utilized, and which may be presented in the form of reports, graphs, or other summaries.
Inside information	refer to	any information that has not yet been publicly disclosed and that is material to changes in the price or value of the Company's securities, including but not limited to the Company's operating results, investment projects, joint ventures, mergers or acquisitions, the acquisition or disposal of a business and/or material assets, dividend payments, and changes in major shareholders, controlling persons, or senior management.
Stakeholders	refers to	any person, group of persons, or legal entity that is directly or indirectly affected by the Company's or its subsidiaries' business operations, or that has any interest in the business operations of the Company or its subsidiaries, or that has influence over person or entity in a manner that may impact the business operations of the Company or its subsidiaries. Stakeholders include, but are not limited to, employees, customers, suppliers, business partners, shareholders, investors, creditors, competitors, government agencies, regulatory authorities, as well as communities and society at large.
The SEC Office	refers to	the Office of the Exchange and Securities Commission
The SET	refers to	the Stock Exchange of Thailand

## 5. Practical Guidelines

- 5.1 Information disclosed shall be accurate, complete, clear, transparent, verifiable, timely, and in compliance with the notifications and regulations of the SET concerning the correct and complete disclosure of information.
- 5.2 Stakeholders, including shareholders, investors, securities analysts, and other interested parties, shall have equal rights to receive the information disclosed by the Company.
- 5.3 Any information that may affect the price of the Company's securities, or that is considered material to investors' investment decisions, or that may impact the rights of shareholders or stakeholders, shall be immediately disclosed to the public through the channels of the SET and the Company's website

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- 5.4 Only the Chief Executive Officer, the Chief Financial Officer, the Head of Finance Division, or the Company Secretary shall have the authority to report or disclose material information on the Company to the SEC Office, the SET, and other relevant regulatory authorities.
  - 5.5 The disclosure of material information of the Company to the public must be approved by the Board of Directors or the Chief Executive Officer (as the case may be). The Chief Executive Officer may choose to disclose the information himself or herself or delegate the authority to the Company Secretary, Investor Relations Officer, or any other person to disclose such information. With respect to information relating to joint ventures, the Company must obtain the approval of the joint venture partner prior to disclosure, in accordance with the terms and conditions of the relevant agreement. All disclosures by the Company shall be made in compliance with the rules and regulations of the SEC Office and the SET.
  - 5.6 The disclosure of financial information, particularly financial statements, must be reviewed or audited by a certified auditor to ensure that they are materially accurate in accordance with generally accepted accounting principles, and must be approved by the Audit Committee and the Board of Directors respectively prior to public disclosure.
  - 5.7 The Company has established the **“Silent Period”** for a period of 30 days prior to the announcement of the Company’s financial statements and operating results to the SET, in order to avoid unequal disclosure of information that may lead to the use of inside information for securities trading (insider trading) or stock price manipulation. During such period, the Company shall refrain from providing any information relating to financial information and operating performance, including refraining from meetings, arranging discussions, or responding to inquiries related to financial statements and performance results from shareholders, investors, securities analysts, and the media.
  - 5.8 Personnel of the Company who know, are involved with, or possess significant non-public information must not disclose such information to any executive, employee, group of persons, or any other person who is not authorized to receive it, including investors, analysts, or the media, until the information has been disclosed to the public through the channels of the SET. Exceptions may be made where disclosure is required by regulations or law to government agencies or regulatory bodies overseeing the Company, or where business necessity requires the disclosure of such information to relevant parties such as auditors, underwriters, financial institutions, financial advisors, legal advisors, or other consultants. In such cases, the Company shall ensure that those parties exercise due care to maintain confidentiality.
  - 5.9 Personnel of the Company must not disclose material information, trade secrets, information the disclosure of which may result in loss of benefits or competitive capability, or information that is inconclusive or under negotiation and subject to uncertainty. Personnel must refrain from disclosing overly

speculative or promotional information without reasonable supporting grounds and avoid the use of inappropriate language or formats that may cause misunderstanding concerning the Company's securities price.

- 5.10 Inquiries made by shareholders, investors, securities analysts, the media, or the general public concerning financial information, operating performance, business operations, corporate policies, plans and investments, projects under development, shareholding structure, or material factors affecting changes in operating performance shall be addressed only by the Chief Executive Officer, Investor Relations Officer, Company Secretary, or personnel assigned by the Chief Executive Officer. Any information provided must already be publicly disclosed, and responses must comply with the requirements of the SEC Office and the SET.
- 5.11 In the event that any information disclosed is inaccurate, deviates from facts, or is materially misinterpreted, the Chief Executive Officer or personnel assigned by the Chief Executive Officer shall have the authority to immediately clarify the facts to ensure accurate understanding.
- 5.12 Upon the occurrence of any significant event, material misinformation, incorrect reference to the Company's information, leakage of material information to unauthorized parties, or premature disclosure that may result in rumors affecting the Company's securities price and/or business operations, whether positively or negatively, the Chief Executive Officer or the Company Secretary must promptly provide clarification of significant information and facts through the channels of the SET and other disclosure channels to ensure correct understanding.
- 5.13 If Company personnel are asked or requested to disclose information for which they are not responsible or authorized to disclose, they must politely decline to provide any information or comment and refer the inquirer to the designated department or responsible personnel to ensure that the information or views provided are accurate and consistent.

## **7. Other Related Policies and Regulations**

The Company's personnel are encouraged to study and understand this policy in conjunction with other Company policies, as follows:

- Corporate Governance Policy
- Business Code of Conduct
- Use of Inside Information and Securities Trading Policy

## **8. Policy Communication and Dissemination**

The Company communicates its Policy and Guidelines on Information Disclosure to all personnel and disseminates such Policy and Guidelines to relevant stakeholders and the general public through various communication channels to ensure proper understanding, appropriate compliance and effective implementation.

## 9. Policy Review and Revision

The Board of Directors assigns the Company Secretary to be responsible for regularly reviewing this Policy to ensure its consistency with applicable laws, regulations, rules, and the guidelines and criteria prescribed by relevant regulatory authorities. The review also aims to enhance the effectiveness and appropriateness of the Policy's implementation. Any amendment or revision to this Policy shall be reviewed and endorsed by the Nomination, Compensation, Corporate Governance and Sustainability Committee, and subsequently approved by the Board of Directors prior to implementation.