

Use of Inside Information and Securities Trading Policy

Symphony Communication Public Company Limited (Revised Edition 2023)

*(Approved by the resolution of the Board of Directors' Meeting No. 6/2023 held on
18 December 2023 and takes effect from 18 December 2023 onwards.)*

Use of Inside Information and Securities Trading Policy

1. Significance

Symphony Communication Public Company Limited (hereinafter referred to as “**the Company**”) is a listed company on the Stock Exchange of Thailand. The Company recognizes the importance of conducting its business in accordance with the good corporate governance principles and is committed to operating with transparency, fairness, and equality toward all shareholders.

2. Objective

This Use of Inside Information and Securities Trading Policy has been established to define guidelines and measures to prevent the Company’s personnel from using inside information that has not yet been disclosed to the public and may materially affect price or value of the Company’s securities, as well as confidential information of the Company, for their own benefit or for the benefit of related persons. This includes any securities trading activities or other actions that may result in unfair practices within the capital market. Furthermore, this Policy aims to ensure that all Company personnel comply strictly with the relevant laws, rules, and regulations governing the use of insider information and securities trading. It also seeks to uphold shareholders’ and investors’ confidence in the Company’s securities and to promote the long-term best interests of the Company’s shareholders.

3. Scope

This Use of Inside Information and Securities Trading Policy shall apply to all business operations of the Company; and all personnel at every level within the Company as well as any individuals acting as representatives of or on behalf of the Company, are required to strictly comply with this Policy.

4. Definitions

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| 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. |
| Inside information | refer to | information that has not been yet disclosed to the public and may materially affect securities price or value, for instance, operating results, investment project, joint investment, merger, acquisition or disposition of business or material assets, dividend payment, change of major shareholders, controlling person, Chief Executive Officer, or senior executives. |

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| Confidential information | refer to | information that is not available to the public and, if made public of or in hand of competitor, may cause serious harm on the business operation or affect competitiveness of a company. |
| Securities | refer to | common stocks, preferred stocks, debentures, stock rights, derivatives (e.g., forwards, futures, options), warrants and other financial instruments that can buy, sell, transfer, or receive transfer in financial market. |
| Convertible Securities | refer to | securities subject to any of any of the following rules and conditions: <ol style="list-style-type: none">1. debt repayment may be converted into settlement of shares issued by a company,2. the securities holder shall have the right to buy shares issued by a company,3. the right to gain return shall be based on the price of the returns from shares issued by a company. |
| Derivatives | refer to | derivatives under the Law on Derivatives, having all of following characteristics: <ol style="list-style-type: none">1. specifying that the counterparty shall gain based on the price or the returns from shares issued by a company,2. traded on a licensed derivatives exchange under the Law on Derivatives. |
| The SEC Office | refers to | the Office of the Securities and Exchange Commission. |
| Executives under the definition of the SEC Office | refer to | Chief Executive Officer (CEO), the first four executives succeeding the CEO, the persons holding equivalent position to the fourth executives, including the persons holding the position of manager or equivalent in accounting or finance department. |
| Related persons | refer to | person having relationship with director or executive in any of the following ways: <ol style="list-style-type: none">(1) spouse or de facto partner,(2) underage children or adopted children,(3) ordinary partnership where director or executive as well as (1) or (2) are partners,(4) limited partnership where director or executive as well as (1) or (2) are partners with unlimited liability or with limited liability provided that their holdings are over 30%, |

- (5) limited company or public company where director or executive plus (1) or (2) or (3) or (4) collectively hold more than 30% stakes,
- (6) limited company or public company where director or executive plus (1) or (2) or (3) or (4) or (5) collectively hold more than 30% stakes,
- (7) juristic person as per Section 246 and 247 of the Securities and Exchange Act authorized to take actions on behalf of the juristic person.
- Close relatives refer to person having blood relations or legal relations by registration, who are:
- (1) spouse,
 - (2) father/mother,
 - (3) siblings,
 - (4) children/adopted children,
 - (5) spouse of children/adopted children.
- Short sales refer to a sale of securities which have been borrowed for settlement.

5. Practical Guidelines

- 5.1 Personnel of the Company who have access to, are involved with, or are in possession of the Company's insider information or confidential information shall not disclose or transmit such information to any external party, including family members, relatives, friends, or colleagues.
- 5.2 Personnel of the Company who have access to, are involved with, or are in possession of the Company's insider or confidential information shall not reproduce or duplicate any such information, whether in printed form or electronic media.
- 5.3 Personnel of the Company are entitled to the right and freedom to trade the Company's securities. However, they must refrain from engaging in any unfair practices related to the trading of the Company's securities or those of entities for their own or others' direct or indirect benefit. Examples of such prohibited conduct include, but are not limited to:
- Not purchasing, selling, transferring, or receiving transfers of the Company's securities by exploiting insider or confidential information for personal or others' benefit. (Insider Trading)
 - Not purchasing, selling, transferring, or receiving transfers of the Company's securities in a manner that misleads others or distorts the normal price or trading volume, with the intent to deceive and benefit from such misrepresentation. (Market Manipulation)
 - Not disseminating false or misleading information that may cause misunderstanding or misrepresentation concerning the Company or the price of its securities. (Misstatement)

5.4 The Company has established a “**Blackout Period**”, during which any personnel of the Company who have access to, are involved with, or are in possession of insider or confidential information, including their close relatives and related persons, are prohibited from subscribing, purchasing, selling, transferring, or receiving transfers of the Company’s securities. This prohibition applies during the 30-day period prior to the disclosure of the Company’s quarterly and annual financial statements, as well as any other periods that the Company may determine from time to time, and shall remain in effect until at least 24 hours after such information has been publicly disclosed.

The Company Secretary shall notify all personnel of the applicable Blackout Periods accordingly.

5.5 Directors and executives under the definition of the SEC Office, who have newly assumed positions, as well as the Company’s external auditors, are required to report their holdings of the Company’s securities, both direct and indirect, including those held by related persons, to the Company Secretary.

5.6 Directors, executives under the definition of the SEC Office, and the Company’s external auditors shall prepare and submit reports on any changes in their holdings of the Company’s securities or derivatives, both direct and indirect, including those of related persons, through the SEC’s electronic filing system within three (3) business days from the date of such purchase, sale, transfer, or receipt of transfer, in compliance with Section 59 of the Securities and Exchange Act B.E. 2535 (1992). A copy of such report shall also be submitted to the Company Secretary for recordkeeping purposes.

However, the following cases are exempt from the requirement to prepare and submit such reports:

- (a) acquisition of securities in proportion to the existing shareholding ratio;
- (b) receipt of securities as dividend payments (stock dividends) from the Company;
- (c) exercise of rights under convertible securities;
- (d) acquisition of securities through inheritance;
- (e) receipt of securities under the Employee Stock Option Plan (ESOP) in accordance with the notifications and criteria prescribed by the SEC Office;
- (f) receipt of shares under the Employee Joint Investment Program (EJIP) in compliance with the SEC Office’s regulations;
- (g) changes in securities or derivatives holdings resulting from transfers between the owner and the custodian acting on behalf of such owner;
- (h) changes in securities holdings arising from securities borrowing and lending transactions conducted with licensed securities borrowing and lending businesses or the Thailand Securities Depository, in accordance with SEC notifications;

- (i) pledging or accepting securities as collateral through the transfer of ownership of such securities, only in relation to transactions under (g);
- (j) changes in securities holdings resulting from a forced sale of securities under the following circumstances:
 1. forced sales pursuant to the conditions governing the acquisition of securities by virtue of being a director or executive of the Company under (e);
 2. forced sale of employer-matching shares under the conditions of the Employee Joint Investment Program (EJIP) under (f).

5.7 The Board of Directors assigns the Company Secretary to compile, prepare, and present a summary report on the securities holdings of the Company's directors and executives under the definition of the SEC Office, including those of their related persons, to the Board of Directors on a quarterly basis. The Company Secretary shall also disclose the number of securities held at the beginning and end of each fiscal year, as well as any transactions made during the year, both direct and indirect, by directors and executives under the definition of the SEC Office, and their related persons, in the Company's Annual Registration Statement/Annual Report (Form 56-1 One Report).

5.8 Personnel of the Company should avoid engaging in the following types of transactions:

- (a) Short selling of the Company's securities, which may send a negative signal to the market regarding the confidence in the Company.
- (b) Trading in derivatives related to the Company's securities, which may give rise to insider trading implications.
- (c) Holding the Company's securities in a Margin Account, which may result in a forced sale of such securities by the brokerage firm without the holder's consent if additional collateral cannot be provided.

6. Violation of the Policy and Disciplinary Actions

Any personnel of the Company who violate this Policy shall be subject to disciplinary action as deemed appropriate, which may include termination of employment. In addition, such individuals may be subject to criminal and/or civil liabilities under the Securities and Exchange Act B.E. 2535 (1992) (as amended) and relevant notifications issued by the competent regulatory authorities.

7. Other Related Policies and Regulations

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

- Corporate Governance Policy
- Business Code of Conduct

8. Policy Communication and Dissemination

The Company provides continuous communication and education regarding the Policy and Guidelines on the Use of Insider Information and Securities Trading to all personnel through orientation programs, training sessions, and meetings. In addition, the Company communicates and disseminates such Policy and Guidelines to relevant stakeholders and the general public through various communication channels to ensure proper understanding and appropriate compliance.

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.