

Translation

Policy for Reporting of Securities Holdings and the Use of Inside Information

1. Introduction

TEKA Construction Public Company Limited (“The Company”) places great emphasis on the prevention of the use of the Company's internal information and its subsidiaries with the aim of prohibiting the Company's directors, sub-committees, executives, auditors, and employees from disclosing secrets or inside information that has not yet been disclosed to the public or for the benefit of oneself or others, whether directly or indirectly, and whether they receive a return or not, including not trading in the Company's securities. To achieve this purpose, the Company has established a policy for reporting on the holding of securities and the use of inside information of the Company as a guideline for further practice.

2. Objectives

- 2.1 To determine the rules regarding the trading of securities of the Company's directors, sub-committees, executives, auditors, and employees of the Company.
- 2.2 To help the Company's directors, sub-committees, executives, auditors, and employees of the Company comply with the Securities and Exchange Act B.E. 1992 (“**Securities Act**”) relating to securities trading by inside information and the notification of the Office of the Securities and Exchange Commission (“**SEC**”) regarding reporting of securities holdings of directors and executives of listed companies.
- 2.3 To maintain the confidence of the shareholders and investors in the Company's securities.

3. Scope

- 3.1 This policy applies to the Company's directors, sub-committees, executives, auditors, and all employees of the Company.
- 3.2 This policy covers the trading of securities of the Company and its subsidiary listed on the Stock Exchange of Thailand or the Market for Alternative Investment (all to be referred to as, "Securities of the Company Group").

4. Definition

Any statements or words in this policy shall have the following meanings, unless the aforementioned statement is shown or otherwise described.

- 4.1 "**Securities**" means shares (ordinary and preferred) and convertible securities, such as debentures, convertible debentures, warrants, or transferable subscription rights, stock options, derivatives (such as futures and options) and other financial instruments that can be traded in the financial markets. Derivative warrants (DW) with the Company's securities as a reference (excluding DWs that are indexed

as underlying factors) or bonds with embedded derivatives or warrants for benefits arising from Thai underlying securities (Non-Voting Depository Receipt (NVDR) or futures contracts in which the company's securities are the underlying and are traded in single stock futures.

4.2 **"Trading"** means buying, selling, transferring, or accepting transfer of securities and/or legal benefits in securities, including the exercising of the right to purchase shares or the exercising of the rights under warrants to purchase shares or convertible debentures.

4.3 **"Inside information"** means facts that are material information that affect the decision to purchase and sell securities that have not yet been disclosed to the public . The examples of inside information include:

- a) Financial position and financial performance
- b) Financial Projections
- c) Joint ventures, mergers, or acquisitions
- d) Payment declaration or not paying dividends or the declaration of profit or loss
- e) Change in par value or paying stock dividends
- f) Acquisition or loss of important commercial contracts
- g) Change in authority to control or significant changes in the board of directors and executives
- h) Redemption of securities
- i) Business plans, including strategic plans, marketing plans, and fundraising plans.
- j) A loan amount that is significant to the financial position and operating results
- k) The issuance of the significant increase capital shares by offering to the public or any persons
- l) Major legal disputes
- m) Buying or selling important assets
- n) Making a tender offer for securities of other companies
- o) Major changes in investment plans or investment projects
- p) Significant changes in accounting policy
- q) Changes in the Company's objectives

4.4 **"Director of the Company"** means the director of the Company.

4.5 **"Sub-Committees"** means the sub-Committees of the Company.

4.6 **"Executives"** means the Chief Executive Officer, the first four executive positions from the Chief Executive Officer position downward, every person holding a position equivalent to a person holding a fourth management position and shall include person holding a management position in the accounting or finance field at the level of department manager or higher or equivalent of the Company (According to the definition of the SEC).

4.7 **"Employee"** means an employee of the Company and subsidiary, including regular employee, special contract worker, temporary employees of the Company.

4.8 "Person designated by the Company" means a person who has a position or duty to know the inside information of the Company (This includes the relationship person). The examples of individuals who may have acquired inside information include:

- a) Sub-committee members who do not under Section 59 of the Securities and Exchange Act
- b) Company Secretary
- C) Secretary of the CEO
- D) Personnel in accounting and finance, positions from accounting manager upwards (Excluding executives according to the definition of the Stock Exchange of Thailand)
- E) Any other person designated by the Company

4.9 "Related persons" means Persons have the following relationship with the director, CEO, C-level as defined by the Stock Exchange of Thailand and the Securities and Exchange Commission Including the person designated by the company

- a) Being a spouse or people living together as husbands or wife
- b) Underage children
- c) Being a juristic person responsible for reporting or a) or b) holding shares in aggregate more than 30% of the total voting rights of that juristic person and such combined shareholding is the largest proportion of that juristic person.

5. Duties and Responsibilities

5.1 The Board of Directors has assigned the Chief Executive Officer to supervise this policy to ensure that the person at the Company strictly follows the policy.

5.2 The Company Secretary is primarily responsible for implementing this policy, including monitoring the effectiveness of this policy as well as clarifying and answering questions and interpreting it in case of doubt. And sent the received from the Person designated by the Company to the Board of Directors by e-mail and deliver it to SEC if requested.

5.3 All executives are responsible for ensuring that their subordinates are aware of the importance of this policy and understand it.

5.4 The directors, sub-committees, executives, auditors, and all employees of the Company shall strictly comply with this policy, including informing their related persons for acknowledgment.

6. Guidelines

6.1 Prohibition of Property Trading by Using Insider Information

The director, sub-committees, executives, auditors and all employees shall comply with the prohibition on insider trading which is defined in Securities Act, Section 242, "No person who knows or possesses inside information related to a securities issuing company shall:

- (1) Purchase or sell securities or enter into a derivatives contract related to securities, either for oneself or other persons, except in the following cases:
 - a) action in compliance with the law, the court's order, or the order of an agency with the legal power;
 - b) action in accordance with the obligations to a derivatives contract that has been made before one becomes aware of or possesses inside information related to the securities issuing companies;
 - c) action not agreed upon or decided by oneself but assigned to an approval or registered person under the law on management of capital or investment to make a securities trading decision or enter into a derivatives contract related to such securities; or
 - d) action not having a characteristic of taking an advantage of other person or any characteristic as specified in the notification of the SEC.
- (2) Disclosure inside information to others persons, either directly or indirectly and by any means, while one knows or ought reasonably to know that the receiver of such information may exploit such information for trading securities or entering into a derivatives contract related to such securities, either for the benefit of oneself or other persons, except when such actions does not have the characteristics of taking an advantage of other persons or has the characteristics as specified in the notification of the SEC.

6.2 Blackout Period

6.2.1 Persons designated by the Company are prohibited from trading in the securities of the Company Group during the period of 30 days prior to the disclosure of the quarterly and annual financial statements and within 24 hours after the disclosure of such financial statements, including other periods that the Company will specify from time to time.

6.2.2 In exceptional circumstances, the person designated by the Company shall sell the securities of the Company Group during the prohibition period if that person is in a situation such as being in a severe financial hardship, having to comply with various legal requirements, or falling under a court order requiring the preparation of a memorandum specifying the reasons for requesting further approval.

- (1) Chairman of the Board (In case the seller is a director of the Company, sub-committees or company secretary)
- (2) Chairman of the Audit Committee (In case the seller is the chairman of the Company)
- (3) Chief Executive Officer (in case that the seller is a person designated by the Company who is not a director of the Company, sub-committees and company secretary)

In this regard, a copy of the aforementioned request memorandum shall be sent to the company secretary.

6.2.3 The company secretary shall announce the prohibition period for securities trading to the person specified by the Company in advance.

6.3 Reporting on Securities Holdings

6.3.1 First Reporting

- (1) In case of newly appointed directors or executives whose names have not been shown in the director and executive database Report the purchase, sale, transfer, or acceptance of transfer of securities or futures contracts of yourself and those associated with them. Through the electronic system of the Securities and Exchange Commission within 7 business days from the date of purchase, sale, transfer or acceptance of transfer of securities or futures contracts.
- (2) The persons designated by the Company other than the Company's directors, executives, and auditors has a duty to prepare a report on the holdings of securities of the Company Group and send it to the company secretary within 7 working days from the date of taking office.

6.3.2 Reporting of Changes

- (1) The directors, executives, and auditors of the Company have a duty to report on the purchase, sale, transfer or acceptance of transfer of securities or futures contracts of yourself and those associated with yourself. through the electronic system of the Securities and Exchange Commission within 3 business days from the date of change in securities holding in accordance with Section 59 of the Securities and Exchange Act.
- (2) Persons designated by the Company other than the Company's directors, executives and auditors has a duty to prepare a report on the change of securities holdings of the Company Group to the company secretary within 3 business days from the date of purchase, transfer or acceptance of transfer of securities.

6.3.3 Exception

Change of securities holdings in the following cases without the need to prepare a report on the Securities Holdings Report.

- (1) The offering of shares to existing shareholders in proportion to their respective shareholdings (Rights Offering)
- (2) The exercise of rights under convertible securities
- (3) Offer for sale or exercise of rights under warrants to purchase shares or convertible debentures (Warrants) newly issued to the Company's directors or employees of the Company (Employee Stock Option Program "ESOP") or receiving securities from the Employee Joint Investment Program ("EJIP")
- (4) Security Inheritance
- (5) Transfer or accept transfer of securities from placing as collateral for futures contracts.

- (6) The acquisition of securities from the payment of dividends of a listed company;
- (7) Borrowing or lending securities to securities companies licensed to undertake securities lending and lending business (SBL) or securities depository centers together in the case where collateral is required from the such transactions as well
- (8) The transfer or acceptance of the transfer made to the securities custodian (custodian) holding securities on behalf of such person.

6.4 Other Restrictions in Securities Trading

6.4.1 The Company encourages the persons designated by the Company to invest in the securities of the Company's group in the long term. However, this shall not be a trade in the Company's securities in the short term or as speculation on the securities of the Company's group.

6.4.2 The designated person shall avoid the following transactions:

- (1) Short sales of securities of the Company Group which may signal to the market that the seller has no confidence in the Company and/or its subsidiaries.
- (2) Trading in derivatives (such as futures and options) related to the Company Group's securities, which may give rise to the characteristics of securities trading using inside information.
- (3) Securities holdings of the Company Group in a margin account, which may be compelled by a securities company to sell such securities without consent in the event that the collateral cannot be added.

7. Penalties for Violating the Policy

7.1 Company Directors and Executives

Directors and executives who violate this policy shall be dismissed from the position, and shall be subject to criminal and civil penalties under the Securities and Exchange Act.

7.2 Persons designated by the Company other than the Company's directors and executives

Persons designated by the Company other than the Company's directors and executives who violate this policy shall be subject to disciplinary action to the point of dismissal, including being liable for the criminal and civil penalties under the Securities and Exchange Act.

8. Policy Review

If the company director, sub-committees, executives, auditors or any employees have questions or concerns about this policy or are not sure whether the inside information with material information is made public or not or will be able to trade securities in any situation shall gain consultations from the company secretary.

Approved	The resolution of the Board of Directors Meeting No. 4/2019 on August 9, 2019
1 st amendment	The resolution of the Board of Directors Meeting No. 5/2022 on November 11, 2022

Signature

(Mr. Vithool Jearkjirm)

Chairman of the Board

TEKA Construction Public Company Limited

**Form Changes the Securities Holding of the Group
For the person designated by the company**

Name.....Tel.....

Position.....Affiliation.....

Request a report on the change in shareholding report form of the group of companies in accordance with the Company's securities holding and inside information reporting policy as follows:

- Me
- People living together as husband and wife / spouse Name.....
- Minor children
- Juristic person designated by the company, spouse, cohabiting person Minor children holding shares in aggregate of more than 30% of the total voting rights of that juristic person and such combined shareholding is the largest proportion of that juristic person. Name of juristic person.....

Type of Securities	<input type="radio"/> The stock <input type="radio"/> Other, specify
<ul style="list-style-type: none"> ➤ Day/Month/Year of transaction.....time..... ➤ Type of transaction <input type="radio"/> Purchase <input type="radio"/> Sell <input type="radio"/> Transfer <input type="radio"/> Receive transfer <input type="radio"/> Others, specify ➤ Number of securities available prior to the transaction date..... ➤ Number of securities that have been transacted..... ➤ Number of securities available after the transaction..... ➤ Name of the securities company used in the transaction..... ➤ If it is a transfer or acceptance of a transfer, Please specify the name of the transferor or transferee..... 	
Endorsement	<input type="radio"/> I hereby certify that the transaction related to securities has not occurred during the period of 30 days prior to the date of announcement of the financial statements. And not within 24 hours after the announcement of the financial statements. or did not perform the transaction during the blackout period announcement

Sign.....Informant As of (.....)	Sign.....Company secretary As of..... (.....)
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