



## Insider Information and Securities Trading Policy

TQR Public Company Limited

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TQR Public Company Limited (the “**Company**”) and its subsidiaries have established policies and procedures to monitor and supervise directors, executives, employees, and staff of the Company and its subsidiaries in order to prevent the disclosure or misuse of confidential and/or inside information of the Company and its subsidiaries that has not yet been disclosed to the public, whether for personal benefit or for the benefit of others, directly or indirectly, and whether or not any consideration is received. In addition, directors, executives, employees, and staff are strictly prohibited from trading the Company’s securities by using inside information. To this end, the Company has established the following guidelines to prevent the misuse of inside information:

### 1. Definitions

“**Trading**” means the purchase, sale, transfer, or acquisition of any legal rights or benefits in securities, including the exercise of rights to purchase shares, or the exercise of rights under warrants to purchase shares or debentures.

“**Inside Information**” means any material fact that may affect the price of securities and that has not yet been disclosed to the public, including but not limited to the following:

- (a) Announcement of dividend payment / non-payment or announcement of profits or losses;
- (b) Joint ventures, mergers, or acquisitions;
- (c) Acquisition or loss of significant commercial contracts;
- (d) Changes in control or significant changes in directors and executive management;
- (e) Changes in par value or the issuance of stock dividends;
- (f) Borrowing of funds in amounts that are material to the Company’s financial position and operating results;
- (g) Significant legal disputes;
- (h) Significant changes in investment projects.

2. The Company shall provide knowledge to its directors and executives regarding their duties to report the holding of securities and derivatives of the Company by themselves, their spouses or persons living together as husband and wife, and their minor children, including juristic persons in which the directors or executives, their spouses or persons living together as husband and wife, and their minor children hold more than 30 percent of the total voting rights of such juristic persons, and such collective shareholding represents the largest shareholding in such juristic persons, to the Securities and Exchange

Commission, in accordance with Section 59 and the penalty provisions under Section 275 of the Securities and Exchange Act B.E. 2535 (1992) (as amended) (the “**Securities and Exchange Act**”), as well as the reporting of the acquisition or disposition of the Company’s securities in accordance with Section 246 and the penalty provisions under Section 298 of the Securities and Exchange Act.

3. The Company requires its directors and executives to prepare and submit reports on the holding of securities and derivatives of the Company by themselves, their spouses or persons living together as husband and wife, their minor children, as well as juristic persons in which such directors or executives, their spouses or persons living together as husband and wife, and their minor children hold more than 30 percent of the total voting rights of such juristic persons, and such collective shareholding represents the largest shareholding in such juristic persons, in accordance with the prescribed securities holding report form, to the Company Secretary prior to submitting such report to the Securities and Exchange Commission each time. Such report shall be prepared and submitted within 30 days from the date of appointment as a director and/or executive and every time there is a change, or a report of changes in securities holding shall be submitted in accordance with the prescribed securities holding change report within the period specified by law. The Company Secretary shall summarize the securities holding reports and changes in securities holding and report them to the meeting of the Board of Directors for acknowledgment on a quarterly basis.

4. Directors and executives, including executives in accounting or finance functions at the level of Division Director or higher or equivalent, and relevant personnel, including persons presumed to know or possess inside information under the Securities and Exchange Act, who have become aware of material inside information affecting the price or value of the Company’s securities, shall refrain from buying, selling, offering to buy or sell, or inducing others to buy, sell, offer to buy or sell the Company’s securities, whether directly or indirectly, during the period prior to the disclosure of financial statements or disclosure of information regarding the Company’s financial position and status, until such information has been disclosed to the public. Such restriction shall apply throughout the Embargo Period, which means one (1) month prior to and until the date of announcement of the Company’s quarterly and annual financial performance. The Company shall notify directors and executives in writing to refrain from trading the Company’s securities at least one (1) month prior to public disclosure, and they should wait at least 24 hours after the information has been disclosed to the public. Disclosure of such material information to other persons is strictly prohibited. Any violation of the above shall be considered a disciplinary offense under the Company’s and/or its subsidiaries’ work regulations, and disciplinary

actions shall be imposed as appropriate, ranging from verbal warning, written warning, probation, to termination of employment.

5. Directors, executives, and employees of the Company and its subsidiaries, as well as former directors, executives, and employees who have resigned, are strictly prohibited from disclosing any inside information or confidential information of the Company and its subsidiaries, including confidential information of the Company's and its subsidiaries' business partners obtained in the course of their duties, to any external persons, even if such disclosure does not cause damage to the Company, its subsidiaries, or their business partners.

6. Directors, executives, and employees of the Company and its subsidiaries, as well as former directors, executives, and employees, are required to maintain the confidentiality of and/or inside information of the Company and its subsidiaries, and to use such inside information solely for the benefit of the Company's and its subsidiaries' business operations. Directors, executives, and employees are strictly prohibited from using the Company's and its subsidiaries' confidential and/or inside information for the benefit of any other company in which they are shareholders, directors, executives, employees, or staff.

7. The Company shall conduct annual communication for directors, executives, and employees regarding the policy on the use of inside information and the code of conduct for securities trading, in order to promote understanding and awareness of the importance of compliance with laws and good corporate governance principles.

**This policy is reviewed and will be effective from November 10, 2025 onwards.**

**Note: Approved by the resolution of the Board of Directors' Meeting No. 7/2025 on November 10, 2025.**