



## Directors, Executives and Employees' Securities Trading Policy

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Thai Steel Cable Public Company Limited recognizes the importance of good corporate governance, transparency, and the equitable treatment of shareholders. Accordingly, the Company has established this Securities Trading Policy to prescribe the principles and requirements governing the trading of the Company's securities by directors, executives, employees, and any persons who possess the Company's inside information. The Policy is intended to ensure compliance with the Securities and Exchange Act B.E. 2535 (1992), as amended, as well as the applicable laws, rules, regulations, and requirements of the Securities and Exchange Commission (SEC), the Stock Exchange of Thailand (SET), and other relevant regulatory authorities.

### Objectives

1. Establish the principles and guidelines governing the trading of the Company's securities by directors, executives, and employees.
2. Ensure that directors, executives, and employees comply with the Securities and Exchange Act B.E. 2535 (1992, as amended (the "Securities and Exchange Act"), particularly with respect to insider trading, and with the applicable notifications of the Securities and Exchange Commission ("SEC") relating to the reporting of securities holdings by directors, executives, and employees of listed companies.
3. Promote transparency and strengthen the confidence of shareholders and investors in the Company's securities.

### Scope

This Policy applies to all directors, executives, and employees of the Company, including their spouses and minor children, in relation to the trading of the Company's securities listed on the Stock Exchange of Thailand.

**Roles and Responsibilities**

1. The Board of Directors delegates the Managing Director to oversee and ensure the strict implementation of the Company's Securities Trading Policy by the Company's directors, executives, and employees.
2. Directors, executives, and employees shall strictly comply with this Securities Trading Policy and shall communicate the Policy to their spouses and minor children to ensure that they are aware of and comply with the relevant requirements.
3. Executives are responsible for ensuring that their subordinates are aware of, understand, and strictly comply with the Company's Securities Trading Policy applicable to directors, executives, and employees.
4. The Company Secretary is responsible for implementing the Company's Securities Trading Policy for directors, executives, and employees, monitoring its effectiveness, and providing clarification and guidance in response to any inquiries regarding the Policy.

**Policies and Guidelines**

1. Prohibition of Securities Trading Using Inside Information

All Directors, Executives, Auditors, and Employees must comply with the prohibition of securities trading using inside information as stipulated in Section 242 of the Securities and Exchange Act: "No person who knows or possesses inside information concerning a securities-issuing company shall: (1) Buy or sell securities or enter into futures contracts related to securities, whether for oneself or another person, except: (a) In compliance with laws, court orders, or orders of competent authorities. (b) In compliance with obligations under futures contracts entered into before acquiring knowledge or possession of inside information concerning the securities-issuing company. (c) Through a person who has been licensed or registered under the law to manage funds or investments, and where such person independently decides on the purchase or sale of securities or entering into futures contracts related to securities, without the knowledge or decision of the person possessing inside information. (d) In a manner that does not take unfair advantage of others or as prescribed by the SEC Office; and (2) Disclose inside information to another person, whether directly or indirectly, and by any means, knowing or ought to know that the recipient may use such information to trade securities or enter into futures contracts related to securities, whether for oneself or another person, except in a manner that does not take unfair advantage of others or as prescribed by the SEC Office."

## 2. Designated Persons

2.1 "Designated Persons" means individuals who, by virtue of their position and/or responsibilities, have access to or become aware of the Company's inside information, including their spouses and minor children. Such persons include:

- (1) Directors;
- (2) The first four executives;
- (3) Executives and employees of key functions, including Accounting and Finance, Business Development, Investor Relations, Internal Audit, and the Company Secretary;
- (4) All executives and employees who attend meetings of the Board of Directors and/or Board Committees; and
- (5) Any other persons designated by the Company.

2.2 The Company Secretary shall be responsible for maintaining the register of Designated Persons and notifying such persons whenever they are added to or removed from the register.

## 3. Reporting of Securities Holdings

### 3.1 Initial Reporting

Newly appointed directors and executives whose names have not yet been recorded in the Securities and Exchange Commission's electronic database of directors and executives shall report any purchase, sale, transfer, or acceptance of transfer of securities or futures contracts by themselves or their related persons through the electronic reporting system of the Securities and Exchange Commission within seven (7) business days from the date of the transaction.

### 3.2 Reporting of Changes

Directors, executives, and the Company's auditor shall report any purchase, sale, transfer, or acceptance of transfer of securities or futures contracts by themselves or their related persons through the electronic reporting system (Form 59) of the Securities and Exchange Commission, as follows:

- 1) Where the aggregate transaction value is THB 3 million or more, the report shall be submitted within three (3) business days from the date of the purchase, sale, transfer, or acceptance of transfer of the securities or futures contracts.
- 2) Where the aggregate transaction value is less than THB 3 million, either of the following reporting methods may be adopted:
  - (1) Submit the report within three (3) business days from the date of the purchase, sale, transfer, or acceptance of transfer of the securities or futures contracts; or
  - (2) Submit the report within three (3) business days from the date on which six (6) months have elapsed since the date of the first transaction.
- 3) Where spouses or persons living together as husband and wife are both directors and executives of the same listed company, the submission of a report by either person to the Securities and Exchange Commission shall be deemed sufficient compliance by the other in accordance with applicable legal requirements.
- 4) Where securities are acquired through a rights offering, conversion of convertible securities, or any other event, the reporting shall be made in accordance with the rules, procedures, and reporting period prescribed by the Securities and Exchange Commission.

### 3.3 Responsibilities of Reporting Persons

Directors, executives, and other persons required to report their securities holdings shall be responsible for the accuracy, completeness, and timely submission of the reports in accordance with applicable laws. Although the Company Secretary or other designated departments may assist in facilitating the preparation of the reports, the legal responsibility for filing the reports remains solely with the reporting person as required by law.

### Blackout Period

1. Designated Persons shall not trade the Company's securities during the period commencing thirty (30) days prior to the public disclosure of the Company's quarterly or annual financial statements and ending twenty-four (24) hours after the financial statements have been publicly disclosed. The Company may also designate additional blackout periods from time to time.

2. Under exceptional circumstances, a Designated Person may sell the Company's securities during the Blackout Period if such person is experiencing severe financial hardship, is required to comply with legal obligations, or is acting pursuant to a court order. The Designated Person shall prepare a written request stating the reasons for the proposed transaction and submit it for prior written approval from:
- (a) the Chairman of the Board of Directors, where the applicant is a director or the Company Secretary;
  - (b) the Chairman of the Audit Committee, where the applicant is the Chairman of the Board of Directors;
  - (c) the Managing Director, where the applicant is a Designated Person other than a director or the Company Secretary.

The applicant shall complete the securities transaction within three (3) business days from the date of receiving the written approval and shall submit a copy of the written request to the Company Secretary for record-keeping.

#### **Prior Notification before Trading Securities**

All Designated Persons intending to trade the Company's securities shall provide prior notification to the Board of Directors and/or any person designated by the Board of Directors at least one (1) day before executing the transaction.

#### **Policy Review**

The Corporate Governance Committee shall review this Policy regularly and submit it to the Board of Directors for approval in the event of any amendments.

#### **Violation of the Policy**

Any director, executive, employee, or any person subject to this Policy who violates or fails to comply with its provisions may be subject to disciplinary action in accordance with the Company's regulations, depending on the severity of the violation. The disciplinary action may include a warning, suspension, or termination of employment, as applicable. In addition, the violator may be subject to civil, criminal, or administrative liabilities under the Securities and Exchange Act B.E. 2535 (1992), as amended, as well as other applicable laws, regulations, and regulatory requirements.

### **Confidentiality**

Securities trading information of directors, the first four executives or in similar positions or Designated Persons shall be kept confidential except for a formal written request from competent authorities, the Stock Exchange or court orders.

### **Inquiries**

Should any Director, Executive, Auditor, or Employee have any questions or doubts regarding this Policy, or be unsure whether material inside information has been publicly disclosed, or have questions regarding the permissibility of securities trading in any situation, please contact the Compliance and investor relations Department through the following channels:

Compliance and investor relations Department

Thai Steel Cable Public Company Limited

Address: 700/737 Moo. 1 Tambol Panthong, Amphur Panthong, Chonburi 20160

Telephone: 038-447-200-05 ext. 118

Email: [ir@tscpcl.com](mailto:ir@tscpcl.com)

This Directors, Executives and Employees' Securities Trading Policy was reviewed by the Corporate Governance Committee Meeting No. 2/2026, and approved by the Board of Directors Meeting No. 4/2026, held on 4 August 2026. Therefore, this Policy shall be effective from 4 August 2026 onwards.

Thai Steel Cable Public Company Limited

(Mr. Sunsum Jurangkool)

Chairman of the Board of Directors