

## Communication and Disclosure Policy

TCM Corporation Public Company Limited recognised the importance of the equitable disclosure of information to all groups of individuals. The revelation of information that affects the stock prices shall be complete, accurate, appropriate, transparent, and punctual to foster confidence among investors and shareholders in accordance with the Company's good corporate governance policy. To comply with the rules and regulations, the Company has developed a communication and disclosure policy to be used as a guideline for the Board of Directors, executives and employees who take responsibility for internal and external communications as follows:

### Principles

The Company shall be responsible for disclosing information that affects the stock prices, which significantly impacts investors' decisions. The information disclosure shall be complete, accurate, sufficient, and timely so that all groups of individuals have equal access to information. The information includes the Company profile, major shareholders, controlling persons, key executives, quarterly and annual financial statements, performance, financial position, long-term business strategy, future investment projects, and significant mergers and acquisitions. In addition, it also includes other relevant information related to significant events which may influence the decision to invest in the Company's securities or cause changes in stock prices.

### Information Disclosure Authorities

The disclosure authorities include the executives in the following positions:

- Chairman of the Board of Directors
- Chief Executive Officer
- Financial Executive Committee

and Investor Relations or other persons whom the authorities above have authorised.

### Information Disclosure Guidelines

1. The disclosed information must be accurate, transparent, verifiable, punctual, not misleading, and sufficient for the decision-making of the users. The disclosure of information must be equitable to all parties to prevent any specific group of individuals from gaining an advantage, which may lead to unfair trade practices in the securities market.

2. Information about quarterly performance reports must be submitted to the Stock Exchange of Thailand (SET) within 45 days after the end of the quarter.

3. Information about the annual financial statements must be submitted to the SET within 60 days after the end of the year.

4. Do not disclose information between 9.00-12.30 and 13.00-17.00 so that the public has enough time to acknowledge and study the information before the SET trading hours in each session.

5. Do not disclose confidential business information or the information that would make the Company lose the ability to compete or the information under negotiation, which is yet to be determined.

6. Information that the Company cannot disclose before reporting to the Stock Exchange of Thailand consists of performance, profits, dividend payments, capital increase or decrease, product development related to natural resources, significant changes in accounting policies, and revenue forecasts.

7. The Company shall act against rumours, leaked information, or news that has a negative impact on securities prices. The authorised person must explain the facts to the public to avoid misunderstanding as soon as possible through the Stock Exchange of Thailand and other appropriate channels following the regulations of the Stock Exchange of Thailand.

8. Abstain from giving information or answering questions about quarterly financial performance for 14 days before the announcement of the financial statements (Silent Period).

#### Information Dissemination Channels

- Disclose information via the Stock Exchange of Thailand (SET)

According to the rules of the Stock Exchange of Thailand, listed companies are responsible for periodic disclosure of information that is material to investment decisions through the SET to provide all groups of investors with equal access to information.

- Disclose information via the Company's website ([www.tcm-corporation.com](http://www.tcm-corporation.com))

The Company can disclose general information through its website as appropriate. If the information must be disclosed to the Stock Exchange of Thailand, it must be announced simultaneously or through the Stock Exchange of Thailand before the Company's website.

- Disclose information in the shareholder meeting, analyst meeting, investor meeting, factory visit, press conference, and other investor relations activities.

## Insider Trading

Insider information is information that has yet to be revealed to shareholders and influences the price of securities. The persons who have access to insider information include the Board of Directors, executives and the employees involved in the financial statements or the third parties who have received insider information, such as the auditor, legal advisor and so forth.

All persons with access to insider information must not trade in the Company's securities during the 45 days before the quarterly financial statements are released to the public and 60 days before the annual financial statements are released to the public, and within 24 hours after the financial statements are released to the public. Additionally, they must not buy, sell, transfer, or accept the transfer of the Company's securities by using insider information that has not been disclosed to the public, regardless of whether it is for personal gain or the benefit of others.

When complaints or investigations indicate the improper use of inside information by employees, executives, or directors for personal gain or other wrongful purposes, the audit committee will appoint a dedicated committee to investigate such incidents thoroughly. If individuals are found guilty, appropriate disciplinary actions will be taken, and legal consequences may follow if the actions are deemed illegal.

## Investor Relations

The Board of Directors requires the management team to appoint investor relations officers to communicate with shareholders and other stakeholders, such as investors and analysts, appropriately, fairly, and timely as follows:

(1) Establish communication and disclosure policies to ensure that the communication and disclosure of information to third parties shall be conducted appropriately, equitably, and timely through the specified channels. This aims to secure confidential information and information that affects stock prices. Notably, internal communication about policy implementation shall be established to promote mutual understanding within the organisation.

(2) Designate the Chief Executive Officer to have the authority to oversee the investor relations unit, which is responsible for providing information to third parties. The team shall be qualified for the duties, understand the nature of the business, main objectives, and corporate values, and communicate effectively with the capital market.

(3) Determine the investor relations direction and support. It is required to provide information disclosure guidelines and policies on managing information that affects stock prices. In addition, the duties and responsibilities of investor relations officers should be stipulated to provide effective communication and disclosure of information.

(4) Promote the application of information technology for information disclosure in addition to the channel of the Stock Exchange of Thailand. The Company requires that information shall be publicly disclosed in both Thai and English via the Company's website ([www.tcm-corporation.com](http://www.tcm-corporation.com)).

(5) The investor relations unit must perform the duties based on the investor relations code of conduct as follows:

- (5.1) Perform the duties with integrity, fairness, and responsibility.
  - (5.2) Information disclosure shall be complete, accurate, timely, and fair to all parties. It is vital to avoid using inappropriate words or misleading statements that may cause a misunderstanding about the Company's securities.
  - (5.3) Provide opportunities for all relevant parties to access and make enquiries.
  - (5.4) Do not reveal any information that may affect the Company's stock price, investment decisions, or the benefits of shareholders before the official publication of the Stock Exchange of Thailand.
  - (5.5) Do not reveal information that has yet to be concluded or information under negotiation which is uncertain or exaggerated.
  - (5.6) Perform the duties by adhering to the interests of shareholders and stakeholders.
  - (5.7) Build confidence and create a positive image of the Company with solid relationships with all stakeholders.
  - (5.8) Safeguard the confidentiality of the Company and avoid seeking personal gain or any benefits for oneself or others by exploiting insider information.
  - (5.9) Perform the duties with full knowledge and skills, be professional, and conduct continuous self-development to improve work efficiency.
  - (5.10) Perform the duties in compliance with the rules and regulations, relevant legal requirements, and other regulatory guidelines from the regulators.
- (6) The Investor Relations of the Company can be contacted at [ir@tcm-corporation.com](mailto:ir@tcm-corporation.com)

By the resolution of the Board of Directors on 9<sup>th</sup> August 2023

TCM Corporation Public Limited Company



(Mr. Pimol Srivikorn)  
Chairman of the Board of Directors