



Policy on the Use of Internal Information and Securities Trading

TQR Public Company Limited

Policy on the Use of Internal Information and Securities Trading

TQR Public Company Limited (“the Company”) and its subsidiaries have established policies and procedures for monitoring and supervising directors, executives, employees, and staff of the Company and its subsidiaries. These guidelines aim to prevent the unauthorized disclosure or use of confidential and/or internal information that has not yet been made public for personal or third-party benefit, whether directly or indirectly, and regardless of whether compensation is involved. Furthermore, the policy prohibits securities trading based on internal information. The measures include the following:

1. Definitions

1.1 “Trading” refers to the buying, selling, transferring, or receiving of legal benefits related to securities, including exercising rights to purchase shares or exercising rights under warrants to purchase shares or debentures.

1.2 “Internal Information” refers to material facts that could influence the price of securities but have not yet been disclosed to the public, including:

- (a) Announcements regarding dividend payments or non-payments, and profit or loss statements.
- (b) Joint ventures, mergers, or acquisitions.
- (c) Significant contracts gained or lost.
- (d) Changes in control or significant changes in the board of directors or management.
- (e) Changes in par value or stock dividend declarations.
- (f) Substantial borrowing that significantly impacts the Company's financial condition or operational results.
- (g) Material legal disputes.
- (h) Significant changes in investment projects.

2. Education for Directors and Executives

The Company educates its directors and executives on their responsibilities to report their holdings of the Company’s securities, as well as those of their spouses, domestic partners, minor children, and associated entities where they hold more than 30% of the total voting rights. Such reports must be submitted to the Securities and Exchange Commission (SEC) per the requirements of Section 59 and Section 246 of the Securities and Exchange Act of 1992, including subsequent amendments.

3. Reporting and Disclosure

Directors and executives are required to prepare and submit reports on their securities holdings and changes to such holdings within 30 days of assuming office or whenever there is a change. These reports must also be summarized and presented to the Board of Directors quarterly.

4. Restrictions on Securities Trading

The policy restricts directors, executives, and employees from trading the Company's securities during the Embargo Period, defined as one month prior to and up to 24 hours following the public disclosure of quarterly or annual financial results. Any violations of this policy may result in disciplinary action, including verbal warnings, written warnings, suspension, or termination.

5. Confidentiality Obligations

Directors, executives, employees, and former staff are prohibited from disclosing confidential or proprietary information of the Company or its partners, even if such disclosure does not result in tangible damage to the Company or its partners.

6. Obligation to Maintain Confidentiality

All directors, executives, employees, and former staff are obligated to safeguard and use confidential and internal information solely for the benefit of the Company's operations. Disclosure or misuse of such information for personal gain or for the benefit of other companies is strictly prohibited.

This policy is reviewed and effective from October 3, 2024 onwards.

Note: Approved by the resolution of the Board of Directors' Meeting No. 5/2024 on October 3, 2024