

# Internal Information, Confidentiality and Data Retention Policy



Sikarin Public Company Limited

## Internal Information, Confidentiality and Data Retention Policy

### Objective

Sikarin Public Company Limited (“Sikarin” or “the Company”) is committed to conducting business under the principles of Good Corporate Governance, with transparency, ethics, and fairness toward all stakeholders. The Company recognizes the importance of controlling the use of insider information, maintaining confidentiality, and protecting sensitive data, especially in the process of securities trading by directors, executives, and employees. This is a crucial mechanism in fostering investor confidence and ensuring fairness in the capital market.

This policy is created to define practices in accordance with the Securities and Exchange Act B.E. 2535 (including its amendments), regulations of the Securities and Exchange Commission (SEC), the Stock Exchange of Thailand (SET), and international best practices, such as the OECD Guidelines for Multinational Enterprises.

The implementation of this policy will help mitigate the risk of reputational damage and legal issues for the company, prevent the misuse of insider information, promote a transparent corporate culture, and enhance the company’s image in the eyes of investors and stakeholders, which will ultimately contribute to increasing the long-term business value.

#### **1.1. Securities Trading Practices**

All personnel of the Company must maintain the confidentiality of the Company's internal information and those of patients or customers, without disclosing the Company's information or news that, if disclosed to the public, will cause a serious impact on the Company, and not providing any information or information that has not been authorized by the authorized person.

- 1) Educating the directors and executives regarding the obligation to report their securities holdings, their spouses and minor children to the SEC under Section 59 and the penalty provisions under Section 275 of the Securities and Exchange Act B.E. 2535 (1992) (as amended), including the reporting of the acquisition or disposal of their securities, their spouse and minor children to the SEC under Section 246 and the penalty under Section 298 of the Securities and Exchange Act B.E. 2535 (1992).
- 2) The directors and executives of the Company, including their spouses and minor children, shall prepare and disclose the report on their securities holdings and the report on changes in the Company's securities holdings to the Office. The SEC has filed a copy of this report with the SEC under Section 59 and the penalty under Section 275 of the Securities and Exchange Act B.E. 2535 (1992) (as amended) and sent a copy of this report to the Company on the same day as the

report submitted to the SEC.

- 3) Directors, executives, and employees of the Company and its subsidiaries who are informed of material inside information that affects changes in the price of securities must exercise caution in trading the Company's securities in the month before the financial statements or inside information are disclosed to the public and during the 2 4-hour period after the Company's internal information has been disclosed to the public. Persons involved in inside information must not disclose such information to others until such information has been notified to the SET. Penalties for violations of the above regulations. The Company considers the disciplinary offense according to the Company's Articles of Association, and will consider the appropriate punishment in the case, including verbal warning, written warning, probation, as well as dismissal from the employee status due to dismissal, dismissal, or dismissal etc.
- 4) Directors and executives as defined by the Securities and Exchange Commission are responsible for preparing and reporting on trading-transfer transfer. The Board of Directors has assigned the Company Secretary to compile a report on the change in the securities holdings of the directors and executives to be included on the agenda for the Board of Directors meeting at every meeting.
- 5) Require directors and executives (as defined by the SEC) to notify the Board of Directors or the person designated by the Board of Directors about the trading of the Company's shares at least 1 day in advance before trading.
- 6) Directors, executives and employees are prohibited from using the Company's internal information that has or may affect the change in the price of the Company's securities which has not been disclosed to the public. The Company has been in such a position or position for the purpose of buying or selling or offering to buy or sell, or soliciting any other person to buy or sell, or offering to buy, or offering to sell the shares or other securities (if any) of the Company, whether directly or indirectly, in a manner that is likely to cause damage to the Company, whether directly or indirectly, and whether such act is done for the benefit of oneself or others, or to disclose such facts for others to do so in return.
- 7) Directors, executives and employees will not seek benefits for themselves or others by relying on confidential information of the Company or its subsidiaries, such as work plans, revenues, meeting resolutions, business forecasts, research experiments, and auctions for personal benefit, regardless of whether the Company suffers damages.
- 8) Prevention of the use of inside information for abuse of benefits, or to reduce the Company's interests, or to cause conflicts of interest, as stipulated in the Good Corporate Governance Policy, Code of Ethics and Conduct, Labor Contracts, and Work Regulations.
- 9) Confidentiality of customer information the Company prohibits directors, executives, employees, and related persons from using such information for their own benefit or those of other persons, except for information that must be disclosed as required by law.
- 10) Information security in the information system by the Company controls and/or prevents access

to the Company's information from third parties and assigns the right of access to information to employees at various levels according to their authority, duties and responsibilities.

- 11) If there is a case where a third party is involved in an ad hoc work on information that has not been disclosed to the public and is under negotiation. This is subject to the retention of internal information that may affect the movement of the Company's securities price. Those persons must enter into a confidentiality agreement until the information is disclosed to the Stock Exchange of Thailand and the SEC.
- 12) Directors, executives and employees must strictly comply with this policy in trading. The Company's listed securities on the Stock Exchange of Thailand or securities traded on the Center shall also communicate this policy to their spouses and minor children.
- 13) The Board of Directors has assigned the Audit Committee to supervise this policy to ensure that the directors and executives comply with the prescribed rules and guidelines for trading the Company's securities.
- 14) Require caution in trading the Company's securities before the Disclosure of inside information to the public Blackout Period.

#### **1.2. Confidentiality Guidelines**

- 1) Determine the confidentiality hierarchy of information, including information that can be disclosed and information that cannot be disclosed. However, the sharing of inside information must only be within the framework of the duties and responsibilities assigned to them.
- 2) Retention and Concealment of Customer and Commercial Information: The Company shall maintain and conceal customer and commercial information confidentially. Not to disclose to the Company's employees and unrelated third parties, unless it is required by law to be disclosed for the purpose of litigation or the Board of Directors approves the disclosure.

#### **1.3. Data Logging and Retention Guidelines**

Disclosure of inside information to the public must be approved by the Managing Director. Managing Director may respond by himself in the case of very significant information or may assign the person in charge to provide information to the public. If the information has not been disclosed to the public, The Company prohibits the disclosure of inside information to third parties arbitrarily to create equality and fairness in the use of the Company's inside information to increase the confidence of shareholders, investors and all related parties. The Company prohibits persons designated by the Company from knowing the Company's internal information as material facts to changes in the price of securities and that have not been disclosed to the public. Whether for the purpose of trading in securities or soliciting other persons to buy, sell, offer or offer for sale the Company's shares, either by themselves or through brokers, regardless of whether such actions are done for the benefit of themselves or others. The Company will consider the misuse of inside information for the purpose of trading the Company's securities as trading securities for

speculation or to create an advantage for a particular group, which is considered an offense under the Securities Act and is considered a disciplinary offense.

1) Report on Securities Holding

The Board of Directors and executives, including those holding positions in the accounting or finance sector, are obliged to report the securities holdings of themselves, their spouses and minor children in accordance with the provisions of the Securities and Exchange Act B.E. 2535 (1992) (as amended) (the "Securities Act"), the Notification of the Securities and Exchange Commission and the relevant Notification of the Capital Market Supervisory Board. The report must be submitted to the Company Secretary before being submitted to the SEC or the Stock Exchange.

2) Report on Securities Holding

The Company shall appoint the Executives, including those who hold positions in the accounting or finance fields. Person in charge of operations, executives Auditors, employees, spouses and minor children of the 39 Corporate Governance Handbook. Report on the change in securities holdings to the SEC under Section 59 of the Securities and Exchange Act B.E. 2535 (as amended) and send a copy of this report to the Company Secretary. On the same day as the report is submitted to the SEC every time.

**1.4. Penalties for the use of inside information**

Violators will be disciplined or may be punished according to the relevant law.

**\* The Company's internal information refers to:**

- Financial Information/Financial Statements/Results of the Company Subsidiaries and/or joint venture companies that have not yet been disclosed to the public through the SET system.
- Production information (including production recipes) of the company Subsidiaries and/or Joint Venture Companies
- Information on the acquisition of important commercial contracts that will have a significant impact on the Company's overall operating results. Subsidiaries and/or Joint Venture Companies
- Information about the Company's administration and management Subsidiaries and/or joint ventures, except for information disclosed in accordance with the law.

The Internal Information Confidentiality and Data Retention Policy is effective from 16 January 2025 onwards by the resolution of the Board of Directors at the meeting No. 1/2025 on 15 January 2025.



Mr. Seni Chittakasaem  
Chairman