

Insider Information Policy

1. Principles and Rationale

The Company recognizes the importance of the use of inside information as a key element in strengthening good corporate governance. The Company adheres to the principles of good governance, integrity, honesty, and ethical business conduct. Accordingly, the Company has established the “Policy on the Use of Inside Information” to prevent directors, executives, persons holding executive positions in accounting or finance at the level of department manager or higher (or equivalent), employees of the Company, as well as any other persons who have access to inside information, from using confidential or non-public information for personal benefit or for the benefit of others, whether directly or indirectly, and regardless of whether any compensation is received, including the use of such information for securities trading. This Policy is established in compliance with applicable laws, rules, and regulations of the Office of the Securities and Exchange Commission (SEC), the Stock Exchange of Thailand, and other relevant regulations, and to enhance confidence among shareholders, investors, and stakeholders that the Company has appropriate, transparent, and auditable governance measures in place.

2. Definitions

“Company” means Ornsirin Holding Public Company Limited, including its subsidiaries, associates, other entities under its control, and business representatives.

“Inside Information” means:

- (1) Financial information / financial statements / operating results of the Company and/or its joint ventures;
- (2) Information relating to land acquisition, design, and construction of the Company and/or its joint ventures;
- (3) Information regarding the acquisition of significant commercial contracts that may materially impact the overall operating results of the Company and/or its joint ventures;
- (4) Information relating to management and executives of the Company and/or its joint ventures.

“Securities” means instruments or evidence of rights in assets, such as treasury bills, bonds, bills, shares, debentures, investment units, warrants to purchase shares, warrants to purchase debentures, warrants to purchase investment units, and any other instruments as prescribed by the Securities and Exchange Commission.

“Derivatives” means derivatives contracts under the law governing derivatives, which have the following characteristics:

- (1) The contract specifies that counterparties receive returns based on the price or return of shares issued by a listed company;
- (2) The contract is traded on a licensed derivatives exchange under the law governing derivatives.

3. Insider Information Policy

This Policy on the Use of Inside Information applies to directors, executives, and employees of the Company who have access to inside information, including their spouses or persons cohabiting as husband and wife, minor children, and juristic persons in which such persons, their spouses or cohabiting partners, and minor children collectively hold more than 30% of the total voting rights and such combined shareholding represents the

largest proportion in that juristic person, as well as other persons who have access to the Company's inside information, such as auditors, financial advisors, legal advisors, etc. The guidelines are as follows:

1. The Company shall provide knowledge to directors and executives regarding their obligations to prepare and submit reports on their securities holdings, including those of their spouse, cohabiting partner, minor children, and juristic persons in which such individuals, their spouse or cohabiting partner, and minor children collectively hold more than 30% of the total voting rights and have the largest shareholding. Such reports must be submitted to the Securities and Exchange Commission (SEC) in accordance with Section 59 and the penalties under Section 275 of the Securities and Exchange Act B.E. 2535 (as amended), as well as reporting the acquisition or disposal of securities in accordance with Section 246 and penalties under Section 298 of the same Act

2. Directors and executives, including their spouse or cohabiting partner, minor children, and juristic persons in which such persons collectively hold more than 30% of voting rights and have the largest shareholding, must notify the Company Secretary (as assigned by the Board) at least one day prior to any purchase, sale, transfer, or acceptance of transfer of securities. They must also prepare and disclose reports on securities holdings and changes in holdings to the SEC within three business days from the transaction date, report such changes to the Board of Directors, and submit initial holdings within 30 days of appointment. Copies of such reports must be provided to the Company on the same date as submission to the SEC. Other persons not defined as directors or executives must report changes in securities holdings to the Company Secretary within three business days from the transaction date

3. Directors, executives, and employees who have access to inside information, including their spouse or cohabiting partner, minor children, and related juristic persons holding more than 30% of voting rights, are prohibited from trading the Company's securities or related derivatives during the period of 30 days prior to the public disclosure of quarterly and annual financial statements, and within 24 hours after such disclosure

4. Directors, executives, employees, and any other persons with access to inside information, such as auditors, financial advisors, or legal advisors, must not disclose or use such information for personal or third-party benefit, including trading or recommending securities transactions. Such information must not be disclosed to others who may use it for similar purposes, particularly competitors, whether directly or indirectly and regardless of any benefit received

5. Directors, executives, employees, and former personnel must not disclose inside information or confidential Company information, including customer data obtained during their duties, to external parties, even if such disclosure does not result in damage

6. Directors, executives, employees, and former personnel must maintain confidentiality of inside information and use it solely for the Company's business purposes, and must not use such information for the benefit of other entities in which they have involvement

7. The Company shall prevent misuse of inside information by restricting access to undisclosed information to only relevant and authorized persons, and by implementing appropriate data security measures, with data owners ensuring strict compliance

8. Disclosure of information must be made only by authorized personnel. General employees are not authorized to disclose information and must direct inquiries to designated responsible persons to ensure accuracy and consistency

9. Any violation of the insider information policy or unauthorized disclosure causing damage to the Company or related parties shall be considered a disciplinary offense, subject to penalties ranging from warning to termination, and may also result in legal action if applicable

Effective from 1 December 2025 onwards.