# Policy on the Use of Inside Information and Reporting of Company Securities Holdings

## (นโยบายการใช้ข้อมูลภายใน และ การรายงานการถือครองหลักทรัพย์ของบริษัท)

ASTRA

# Policy on the Use of Inside Information and Reporting of Company Securities Holdings

## 1. Objective

To comply with the company's good corporate governance policy and the relevant provisions of the Securities and Exchange Act regarding the prohibition of trading securities using inside information for the benefit of oneself or others, and the relevant announcements and regulations of the Office of the Securities and Exchange Commission ("SEC").

## 2. Definition

| Term | Definition |
|---|---|
| **Director** | Means a person holding the position of Director of ASTRA Enterprise Public Company Limited. |
| **Executive** | Means an employee of the company holding the position of Chief Executive Officer (CEO) and Chief Officer (C – Level). |
| **Inside Information** | Means material facts that are important to the change in the price of securities, which have not been disclosed to the public, and which would be an unfair advantage to third parties, whether directly or indirectly, and whether for the benefit of oneself or others, such as financial information, dividend payment information, and information regarding the acquisition of important commercial contracts, etc. |
| **Related Person** | Means a spouse or a person cohabiting as husband and wife, a minor child, and a juristic person holding more than 30% of the shares (including a spouse or a person cohabiting as husband and wife and a minor child) of the Director, Executive, and employees. |

| Term | Definition |
|---|---|
| **Securities** | Means ordinary shares and convertible securities, including debentures, convertible debentures, warrants to purchase shares or debentures (Warrants), or transferable subscription rights (TSRs), stock options (Stock Options), derivatives, and other financial instruments that are tradable in the financial market. |
| **Trading** | Means the purchase, sale, transfer, or acceptance of transfer of securities and/or various legal benefits in the securities, including the exercise of the right to purchase shares or the exercise of rights under warrants to purchase shares or convertible debentures. |

# 3. Operating Guidelines

3.1 Directors, Executives, and Employees, including Related Persons, are prohibited from buying, selling, offering to buy, offering to sell, or inducing others to buy, sell, offer to buy, or offer to sell the Company's securities, whether directly or indirectly, in a manner that takes unfair advantage of third parties by relying on Inside Information learned by virtue of their position or status, and regardless of whether such act is for the benefit of themselves or others, or whether they disclose the Inside Information for others to commit such act for which they receive a benefit in return.

3.2 Directors, Executives, and Employees, including Related Persons, are prohibited from trading the Company's securities during the restricted periods, categorized by the type of Inside Information as follows:

**3.2.1 Financial Statements:** Trading of the Company's securities is prohibited from the 15th day of the month following the end of the quarterly or annual accounting period until 24 hours after the Company has submitted the financial statements to the Stock Exchange of Thailand and disclosed them to the public. The Company Secretary will announce the black-out period for securities trading each time.

**3.2.2 Other Information:** Trading of the Company's securities is prohibited from the time the information is received until 24 hours after the Company has disclosed it to the public.

3.3 Directors and Executives must prepare reports on the holding and change of the Company's securities, categorized by the type of reporting as follows:

**3.3.1 Initial Reporting:** Directors and Executives must prepare a report on the securities holdings of themselves and their Related Persons according to the Company's securities holding report form and submit it to the Company Secretary within 30 days from the date of appointment.

**3.3.2 Quarterly Securities Holding Report:** Directors and Executives must prepare a report on the securities holdings of themselves and their Related Persons as of the end of each quarterly accounting period, according to the Company's securities holding report form, and submit it to the Company Secretary within 15 days from the date of the end of each quarterly accounting period. The Company Secretary will notify the reporting period each time.

**3.3.3 Reporting upon Change:** Directors and Executives must prepare a securities holding change report form as provided in the electronic system and submit it to the SEC Office according to the Notification of the Securities and Exchange Commission No. SorChor 38/2561 and notify the Company Secretary for acknowledgement within 3 working days from the date they or their Related Persons trade the Company's securities.

3.4 Directors and Executives are not required to prepare a securities change report in cases where the change occurs under the following exceptions to the reporting requirement:

3.4.1 Acquisition of securities in proportion to the number of shares held by each shareholder.

3.4.2 Acquisition of securities from the Company's stock dividend payment.

3.4.3 Exercise of rights under convertible securities.

3.4.4 Acquisition of securities by inheritance.

3.4.5 Acquisition of securities from the offer for sale of newly issued securities to the Company's directors or employees (Employee Stock Option Program "ESOP") or acquisition of securities from an Employee Joint Investment Program ("EJIP").

3.4.6 Lending or borrowing of securities with a securities company licensed to undertake the securities borrowing and lending business (SBL) or the Thailand Securities Depository Co., Ltd., including cases where collateral is required for such transactions.

3.4.7 Transfer or acceptance of transfer made with a custodian who holds securities on their behalf.

# 4. Related Policies / Announcements

- None -

This policy shall be effective from February 26, 2026, onwards.

Mr. Chatchaval Jiaravanon

Chairman of ASTRA Enterprise

Public Company Limited