

Investor Relations Code of Conduct

The Siam Cement Public Company Limited



The Siam Cement Public Company Limited has compiled this Investor Relations Code of Conduct to establish guidelines for correct and proper practices to which investor relations officers (IROs) can adhere. The Code of Conduct details fundamental principles regarding information disclosure, inside information protection, fair and equitable treatment of stakeholders, and integrity, all of which are consistent with SCG Corporate Governance and form a basis on which added value can be created and the Company can inspire confidence in its shareholders, investors, the general public, and every stakeholder.

The Investor Relations Code of Conduct comprises four main principles as follows:

1. Disclosing information material to investment decisions accurately, sufficiently and timely
2. Handling and protecting inside information
3. Disclosing information fairly and equitably
4. Performing duties with integrity

1. Disclosing information material to investment decisions accurately, sufficiently and timely

- 1.1 Disclose information material to investment decisions accurately, sufficiently, and in a timely fashion in accordance with the rules and regulations of the authorities concerned such as the Securities and Exchange Commission (SEC) and the Stock Exchange of Thailand (SET).

- 1.2 Exercise their discretion and caution in disclosing information and refuse to divulge trade secrets or information that may compromise the Company's competitive.
- 1.3 Disclose information in a regular and clear manner and exercise caution to prevent misunderstanding or misinterpretation. In addition, they must provide both positive and negative facts, ensure sufficient details for a clear understanding, and recognize that a disclosure of complete information will enable information receivers to better approximate and predict the Company's current and future performance.
- 1.4 Clarify facts to the general public in the timely manner in accordance with the rules and regulations of the SET and relevant authorities upon the surfacing of rumors, news leaks, inaccurate understanding among stakeholders, or any information about the company that may significantly influence investment decisions or the price or value of the Company's securities.
- 1.5 Do not disclose inaccurate information or information that is conjectural or predictive in nature, either verbally or in written forms, prior to public disclosure with the intention to manipulate the purchasing of the Company's shares.
- 1.6 Do not provide negative or slanderous information about the Company's competitors or stakeholders.
- 1.7 Establish information dissemination channels or sources to ensure equitable disclosure of information.

2. Handling and protecting inside information

- 2.1 Do not use inside information which is material and not yet to be publicly disclosed for IROs' own interest or the interest of others and must not disclose such information until it has been publicly disclosed in accordance with relevant rules and regulations.
- 2.2 Comply with laws, rules, regulations, and the Company's policies related to handling of inside information. Material information that may affect performance should be disclosed through channels provided by the SET before it is relayed to any specific investor group.
- 2.3 Adopt a "Quiet Period" of at least two weeks prior to the disclosure of the Company's financial statements, during which IROs will not host a meeting or provide analysts and investors with information or answer questions related to the Company's short-term performance.

3. Disclosing information fairly and equitably

- 3.1 Host activities for different stakeholder groups as deemed appropriate to offer opportunity to each group for equal and fair access to information and ensure that no group is placed in a disadvantageous position or has their investment opportunities compromised.
- 3.2 Provide channel with equal opportunity for all stakeholders to contact and make enquiries and must not extend special privileges to any particular group of stakeholders.
- 3.3 Disclose promptly the information presented in exclusive meetings such as roadshow and analyst presentations on the Company's websites and the channels provided by the SET after such meetings so that it becomes publicly available.
- 3.4 Treat each stakeholder group as the following guidelines:

(1) Investors

- Treat all investors, retail or institutional, equally.
- Provide opportunity to retail investors for the same level of access to data as analysts and institutional investors.
- Do not discriminate in accepting one-on-one meetings with institutional investors or investor groups.

(2) Analysts

- Offer analysts from every securities company equal opportunities to attend analyst meetings arranged by the Company.
- Do not give any gift or reward to analysts with the intention to influence them to write analysis for the Company or write reports on the Company in a positive light.
- Respect the report and opinion of analysts. Should such a report of opinion includes or provides inaccurate information, IROs may offer clarifications.

(3) Media

- Give opportunity to the media equal access to accurate, clear, and pertinent information.
- Do not disclose information that is about to be publicly disclosed in the media to any specific media outlet in advance.
- Do not give any gift or reward to analysts with the intention to influence them to write groundless news or articles for the Company.

(4) Regulators

- Cooperate in providing vital and appropriate information when requested by regulators.

- Do not give any gift or reward to regulators with the expectation of special treatment in return.

(5) Internal parties

- Host activities occasionally so that the executives of the Company can meet different stakeholder groups as deemed appropriate.
- Report to the Board of Directors and the executives all useful information that helps add value to the Company such as results of investor relations activities, opinions of analysts and investors, and capital market sentiment.
- Communicate the Company's Investor Relations Code of Conduct to employees with responsibilities relating to investor relations so as to establish a uniform practice consistent with that of IROs.

(6) Other stakeholders

- Disclose information to other stakeholders accurately, sufficiently, timely, and equitably. Should a disclosure be necessitated for certain business operations, utmost caution must be exercised to safeguard confidentiality.

4. Performing duties with integrity

- 4.1 Do not receive gifts or reward that may be construed as personal incentives or gain.
 - 4.2 Avoid actions that constitute conflicts of interest with the Company such as the use of the Company's assets or information for personal gain.
 - 4.3 Do not exploit their relationship or information obtained as IROs to seek personal gain.
 - 4.4 Comply with SCG policies and Code of Conduct and report to supervisors should noncompliance of the Investor Relations Code of Conduct arise.
-