



Securities Holding Reporting and Insider Information Policy

Effective from 13 August 2025

Securities Holding Reporting and Insider Information Policy

Introduction

Precise Corporation Public Company Limited (the “Company”) places great importance on preventing the use of inside information of the Company and its subsidiaries. The Company intends to prohibit directors, executives, and relevant employees from using, disclosing, or exploiting confidential or inside information that has not yet been disclosed to the public for their own benefit or for the benefit of others, either directly or indirectly, whether any consideration is received. They must also not trade the Company’s securities by using inside information.

To achieve this objective, the Company has established this Securities Holding Reporting and Insider Information Policy for the Company group as a guideline for proper conduct.

Objectives

1. To prescribe criteria and practices relating to the trading of securities by directors, executives, and employees of the Company group.
2. To help directors, executives, and employees of the Company group who are responsible for such matters to perform their duties correctly in accordance with the Securities and Exchange Act B.E. 2535 (1992) (as amended) (the “Securities and Exchange Act”) with respect to insider trading, and in accordance with notifications of the Securities and Exchange Commission (“SEC”) relating to the reporting of securities holdings of directors and executives.
3. To maintain the confidence of shareholders and investors in the Company’s securities.

Scope

This Policy applies to directors, executives, and relevant employees. Certain parts of this Policy also extend to their spouses or persons living together as husband and wife, and their minor children.

Accordingly, directors, executives, and relevant employees must communicate the key provisions of this Policy to such persons so that they are aware of it.

Definitions

Securities

Refer to shares (common and preferred) and convertible securities, Including:

- Debentures
- Convertible debentures
- Warrants
- Transferable Subscription Rights (TSR)
- Stock options
- Derivatives (e.g. futures and options)
- Futures contracts relating to securities
- Any other instruments as prescribed by the Securities and Exchange Act or by the SEC Office.

Trading

Includes the purchase, sale, transfer, or acceptance of transfer of securities and/or other legal interests in securities, including the exercise of rights to purchase shares or to exercise rights under warrants or convertible debentures.

Short Sale

Refer to the sale of shares that the seller has borrowed from a securities company or an institution providing stock-lending services. The short seller must deposit margin with the lending firm in an amount not less than the rate prescribed by the Stock Exchange of Thailand, and the proceeds from the sale must be held by the brokerage firm as collateral until the borrowed shares are returned on the due date (or earlier, if returned before maturity).

While the borrowed shares have not yet been returned, if any entitlements arise such as dividends, rights to subscribe for additional shares, or other benefits granted by the issuing company the short seller must deliver such entitlements to the brokerage firm, which will then forward them to the original lender of the shares.

Inside Information

Refers to material facts that are significant to investment decisions regarding the purchase or sale of securities, or information that can reasonably affect the price of securities either positively or negatively that has not yet been disclosed to the public. Examples of inside information include, but are not limited to:

- a) Financial position and financial performance
- b) Financial projections

- c) Joint ventures, mergers, or acquisitions
- d) Announcements of dividend payments, non-payment of dividends, or declarations of profit or loss
- e) Changes in par value or issuance of stock dividends
- f) Obtaining or losing significant commercial contracts
- g) Changes in control, or significant changes in the Board of Directors and executives
- h) Redemption of securities
- i) Business plans, including strategic plans, marketing plans, and fundraising plans
- j) Borrowing funds in amounts that materially affect the financial position or operating results.
- k) Significant capital increases offered to the public or any specific persons
- l) Major legal disputes
- m) Purchase or sale of significant assets
- n) Tender offers for the securities of another company
- o) Major changes in investment plans or investment projects
- p) Significant changes in accounting policies
- q) Changes to the company's objectives
- r) Delisting of the company's securities from the stock exchange

Impact on Securities Prices

Refers to any effect that causes the price of securities to rise, fall, remain unchanged, or be artificially maintained.

Director

Refers to the director of the Company or its subsidiaries.

Executive

Refers to the Chief Executive Officer or the highest-ranking executive, the first four executives immediately below the highest-ranking executive, any person holding a position equivalent to the fourth executive level, and all executives in the accounting or finance functions at the department manager level or equivalent and above (in accordance with the definition of the Office of the SEC). This also includes executives of the Company's subsidiaries.

Relevant Employees

Refers to employees or contractors of the Company or its subsidiaries, including full-time employees, special contract employees, and temporary employees, who hold positions or responsibilities that allow them to access inside information of the Group, or who are responsible for safeguarding such information. This includes, but is not limited to, the following persons:

- (1) Employees working in departments such as Accounting/Finance, New Business Development, Investor Relations, Corporate Secretary, Internal Audit, Legal, Risk Management, Compliance, etc.
- (2) Employees who attend meetings of the Board of Directors, Board committees, or any other meetings where inside information is used or discussed.
- (3) Persons who act as representatives of, or present themselves on behalf of, the Company or its subsidiaries.
- (4) Any other persons designated by the Company, such as consultants or appraisers.

Designated Persons

Refers to:

- Directors and executives of the Company, including their spouses or partners living together as husband and wife, minor children or adopted children, and any juristic person in which such individuals collectively hold more than 30% of total voting rights.
- Relevant employees of the Company, as well as directors, executives, and relevant employees of the Company's subsidiaries.

Duties and Responsibilities

1. The Board of Directors has assigned the Chief Executive Officer (CEO) to be responsible for overseeing this Policy to ensure that all Specified Persons strictly comply with it.
2. The Company Secretary is primarily responsible for implementing this Policy, monitoring its effectiveness, and explaining and answering questions in case of any doubts.
3. Executives are responsible for ensuring that their subordinates recognize the importance of, and understand, this Policy.
4. Directors, executives, and employees of the Company group must strictly comply with this Policy and communicate it to their spouses or persons living together as husband and wife, and to their minor children, so that they are aware of it, to promote transparency and adherence to principles of good corporate governance.

5. The Company Secretary shall provide training and information to directors, executives, and relevant employees regarding their duties in complying with measures to prevent the use of inside information for personal gain, so that they adhere strictly to these measures.

Guidelines

As a rule, directors, executives, or relevant employees may trade the Company's securities. However, they must comply with the prohibitions on insider trading prescribed in Section 242 of the Securities and Exchange Act, as follows:

- (1) They must not trade the Company's securities unless they do not hold inside information.
- (2) They must not trade the Company's securities, directly or indirectly, through family members or through any person/juristic person controlled by family members, unless they are confident that they do not hold inside information.
- (3) They must not disclose inside information to family members or to any person/juristic person controlled by family members.

The above prohibitions on trading the Company's securities apply to all Specified Persons who are involved with inside information, such as in the preparation of financial statements, preparation of project information that is confidential or not yet disclosed to the public, etc. These persons must comply with the Company's measures to prevent the use of inside information for personal gain.

1. Establishment of Designated Persons and Blackout Periods

- 1.1 The Company identifies individuals who know or possess inside information ("Designated Persons") in accordance with applicable laws and relevant regulations. The Company also sets a *Blackout Period* of 30 days prior to the disclosure of quarterly and annual financial statements, and 24 hours after such disclosure. This includes any additional periods that the Company may specify from time to time.
- 1.2 The Company Secretary announces the Blackout Period in advance to all Designated Persons.
- 1.3 Designated Persons are prohibited from trading the Company's securities during the Blackout Period.

2. Advance Notice Prior to Securities Trading

- 2.1 When directors, executives, or relevant employees wish to trade the Company's securities in their own name or on behalf of any related person whose name appears in the register of persons specified by the Company, such directors, executives, and relevant employees must notify the Company through the Company Secretary, in the form and manner prescribed by the Company, at least 1 day in advance before executing the trade.
- 2.2 Each notice of intention to trade shall be valid for 7 days from the date on which such notice is given.

3. Approval to Sell Securities During the Blackout Period

In exceptional circumstances, people designated by the Company may be permitted to sell the Company's securities during the blackout period if they are in situations such as severe financial hardship, being required to comply with legal or regulatory obligations, or being subject to a court order. In such cases, they must prepare a written memorandum stating the reasons and submit a request for approval to the authorized person, as follows:

Person requesting to sell securities	Approving authority
(1) Chief Executive Officer / Director / Company Secretary	Chairman of the Board
(2) Chairman of the Board	Chairman of the Audit Committee
(3) Other people designated by the Company (apart from (1) and (2))	Chief Executive Officer

The request must be submitted through the Company Secretary, in the form and manner prescribed by the Company, at least 3 days in advance.

4. Reporting Changes in Securities Holdings

- 4.1 Directors, executives, and relevant employees of the Company and its subsidiaries have a duty to report changes in their own securities holdings, as well as those of related people who are designated by the Company, to the Company via the Company Secretary, in the form and manner prescribed by the Company.

- 4.2 Directors and executives of the Company specifically are required to report changes in their securities holdings to the Office of the SEC on Form 59 within the time limits prescribed by the SEC, as follows:
- 1) Within 7 business days from the date of purchase or sale of securities, in cases where the reporting person is a director or executive of the Company or a subsidiary, and all the following conditions are met:
 - a) The Company has already submitted the list of its directors and executives into the information system for directors and executives of securities-issuing companies, in accordance with the form and method prescribed by the SEC in the notification on the form and method for reporting or changing information on directors and executives of companies issuing securities; and
 - b) The duty to report the purchase or sale of securities arises **before** the date on which the person's name appears in the said director and executive information system under a).
 - 2) Within 3 business days from the date of purchase or sale of securities in all other cases apart from 1).

5. Exceptions

Changes in securities holdings in the following cases do not require the submission of a change-in-securities-holding report on Form 59:

- 5.1 Acquisition of securities in proportion to the number of shares held by each shareholder (Rights Offering)
- 5.2 Acquisition of securities from the Company's stock dividend (Stock Dividend)
- 5.3 Exercise of rights under convertible securities (Warrants)
- 5.4 Acquisition of securities or futures contracts by inheritance
- 5.5 Acquisition of securities from the offering of newly issued shares, or from the exercise of rights under warrants or convertible debentures issued to directors or employees of the Company (Employee Stock Option Program: "ESOP"), or acquisition of securities from an Employee Joint Investment Program ("EJIP")

In all such cases, directors, executives, and relevant employees still have a duty to report these changes to the Company through the Company Secretary, in the form and manner prescribed by the Company.

6. Other Restrictions on Securities Trading

- 6.1 The Company encourages designated people to invest in the Company's securities on a long-term basis. They should not trade the Company's securities in the short term (a holding period of less than 3 months) or engage in speculative trading in the Company's securities.
- 6.2 Designated persons should avoid the following types of transactions:
 - Short sale of the Company's securities, which may send a signal to the market that the seller lacks confidence in the Company and/or its subsidiaries.
 - Trading in derivatives (such as futures and options) that are related to the Company's securities, which may create a pattern resembling insider trading.
 - Holding the Company's securities in a margin account, which may result in the securities company force-selling such securities without the holder's consent if additional collateral cannot be provided.

Penalties for Violations

Directors, executives, and relevant employees who act in violation of this Policy, its guidelines, or the measures prescribed by the Company to prevent the use of inside information for personal gain, including the handling of inside information that affects the price of securities, shall be deemed to have violated the Company's Code of Conduct and shall be subject to disciplinary action. They may also be subject to criminal and civil liability under the Securities and Exchange Act.

Actions in Case of Doubt Regarding the Policy

If any director, executive, or employee has any questions or doubts about this Policy or is unsure whether material inside information has already been disclosed to the public, or whether they may trade securities in any situation, they may consult the Company Secretary.