

Gunkul Engineering Public Co., Ltd. and GUNKUL Group			
	Investor Relations Ethics Policy	Doc. No.	POL-BOD_68-036
		Effective date	13 NOV 2025
	Approved by the Resolution of the Board of Directors Meeting No. 7/2025, dated 13 November 2025	Issue No.	8.0
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1. Intro

The Board of Directors, sub-committees, regulatory agencies, as well as executives and employees of the organization give importance to conducting business according to the Good Corporate Governance Policy and the Business Ethics Policy in order to ensure that organizational operations are correct, complete, transparent, and consistent with the laws, terms and regulations of the Securities and Exchange Commission (“SEC”) and the Stock Exchange of Thailand (“SET”). There is an emphasis on disclosure of information and strict compliance with relevant laws and regulations, and adhering to the interests of shareholders and all stakeholders as important. Accordingly, the Company has established the “Investor Relations Ethics Policy” for executives and employees involved in the Company's investor relations work to use as a guideline for performing duties correctly and appropriately.

2. Objectives

1. To use as a guideline for supervision, monitoring, control, and management of those assigned by adhering to it as a framework for performing duties based on the principle of caution.
2. To maximize the benefits of all stakeholders equally and fairly.
3. To build confidence among investors and the capital markets through the provision of accurate, complete, and transparent disclosures.
4. This policy and practice guideline are required to be reviewed regularly on an annual basis.

3. Basic Principles of Investor Relations Ethics

1. To disclose important and necessary information for investment decisions accurately, adequately, and in a timely manner, in accordance with the regulations and requirements of the SEC, the SET, and other relevant authorities, including the Company's regulations and policies by taking into account the disclosure information of environmental, social, and governance (ESG) with the guidelines prescribed by the Stock Exchange.
2. To maintain confidentiality, not use and disclose the internal information of the Company and its Group for personal or third-party gain in an improper manner.
3. To disclose information equally and fairly by providing the stakeholders an opportunity to access and inquire about information equally.
4. To perform duties with professional honesty on the basis of the principles of accuracy and equality.

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4. Practices according to Investor Relations Ethics

1. To perform duties with full knowledge and capability, responsibility, professionalism, and continuously seek knowledge to improve work efficiency. Uphold principles of correctness and equality, with a focus on the interests of all shareholders, including both major and minority shareholders, Thai and foreign shareholders, executive and non-executive shareholders, and stakeholders, without discrimination or favoring any individual.
2. To comply with the laws, regulations, requirements, and guidelines of regulatory authorities, such as the SEC, the SET, as well as the Company's rules and policies strictly.
3. To disclose important and necessary information for investment decisions accurately, completely, clearly, adequately, and timely, in a fair and equal manner to all stakeholders, while exercising utmost caution to avoid misunderstanding or misinterpretation.
4. To provide all stakeholders with access to and the ability to inquire about information as appropriate through the Company's channels, such as the investor relations contact number and the Company's website, without discrimination by contacting only specific individuals and/or groups.
5. To maintain confidentiality, do not use and disclose any internal information of the Company and its Group for personal or third-party gain in an improper manner, until the information is publicly disclosed.
6. To disclose information or resources to users of the information, such as shareholders, investors, securities analysts, financial institutions, official agencies, mass media, people within the organization and all groups of stakeholders, equally, such as through the information reporting system of the SET, the SEC and/or the Company's website, etc. However, the format and activities to provide information may vary as appropriate.
7. To refrain from providing information about operating results to shareholders, investors, analysts, and stakeholders for not less than 15 days before the financial statements are disclosed to the public through the information reporting system of the SET.
8. To build confidence, strengthen the image and good attitude of the Company, including building good relationships to all stakeholders.
9. To designate the Chief Executive Officer to designate persons that provide information to shareholders, investors, analysts, and stakeholders.
10. To assign executives and employees involved in investor relations work to comply with the Good Corporate Governance Policy regarding securities trading and use of the Company's internal information. They are prohibited from buying and selling the Company's securities from the date of acknowledgment of the Company's financial statements until the 24-hour

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period after the financial statements are disclosed to the public through the information reporting system of the SET.

11. If there is a violation of any of the principles of this investor relations ethics, such violations and impacts shall be reported without delay to the Head of Investor Relations and/or the Chief Executive Officer and/or the Executive Committee of the Company (depending on the case).

5. Policy Review

This policy is required to be reviewed regularly on an annual basis.

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Revision Record

Document No.	Issue No. /Revision No.	Date	Revised Part	Reason of Revision	Date of Cancellation
OMD 2561/12	1.0	19 NOV 2018	Newly written	To comply with the principles of the supervising agency and the current operations	8 NOV 2019
OMD 2562/23	2.0	8 NOV 2019	Reviewed	To comply with the principles of the supervising agency and the current operations	1 MAR 2021
POL-BOD 64-018	3.0	1 MAR 2021	Reviewed	To comply with the principles of the supervising agency and the current operations	12 NOV 2021
POL-BOD 64-037	4.0	12 NOV 2021	Reviewed	To comply with the principles of the supervising agency and the current operations	27 FEB 2023
POL-BOD 66-008	5.0	27 FEB 2023	Reviewed	To comply with the principles of the supervising agency and the current operations	28 FEB 2024
POL-BOD 67-015	6.0	28 FEB 2024	Reviewed	To comply with the principles of the supervising agency and the current operations	13 NOV 2024
POL-BOD 67-038	7.0	13 NOV 2024	Reviewed	To comply with the principles of the supervising agency and the current operations	13 NOV 2025
POL-BOD 68-036	8.0	13 NOV 2025	Reviewed	To comply with the principles of the supervising agency and the current operations	