

| Gunkul Engineering Public Co., Ltd. and GUNKUL's Group                            |   |                |                |
|---|---|----------------|----------------|
|  | Investor Relations Ethics Policy  | Document No.   | POL-BOD_64-037 |
|   |   | Effective date | 12 NOV2021     |
|   | Approved by the Resolution of the Board of Directors Meeting<br>No. 9/2021 dated 10 November 2021 | No.            | 4.0            |
|   |   | Page           | 1 / 5          |

|  | <u>Page</u> |
|--|-------------|
| 1. Intro   | 2           |
| 2. Objectives  | 2           |
| 3. Basic Principles of the Investor Relations Ethics | 2           |
| 4. Practices of the Investor Relations Ethics        | 3           |
| 5. Policy Review                                     | 4           |

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|   |   | Page           | 2 / 5          |

## 1. Intro

The Board of Directors, Sub-committee, Organization supervision, Executives and employees of the organization have focused on the business operations according to the policy on Good Corporate Governance and Policy on Business Ethics in order to ensure that the operation of the organization is accurate, complete, transparent, in accordance with the law, regulations of the Securities and Exchange Commission (SEC) and the Stock Exchange of Thailand (SET) with emphasis on disclosure of information and compliance with relevant laws and regulations and adhering to the interests of all shareholders and stakeholders. Therefore, the Company has prepared an "Investor Relations Ethics Policy" for the executives and employees that involved in the investor relations work to be used as a guideline or framework for performing the duties of the investor relations of the Company.

## 2. Objectives

1. To be used as a guideline for supervision, monitor, control and supervision of delegates, based on the framework of performing duties on the principle of caution.
2. To maximize the benefits of all stakeholders equally and fairly.
3. To require regular review of this policy and practice on an annual basis.

## 3. Basic Principles of the Investor Relations Ethics

1. Disclose important and necessary information for making accurate and timely investment decisions.
2. Do not use internal information for personal gain and others.
3. Disclose information equally and fairly, by giving opportunities for all related parties to access and inquire information.
4. Perform duties with honesty, based on the principle of equality.

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|   |   | Page           | 3 / 5          |

#### 4. Practices of the Investor Relations Ethics

1. Disclose important and necessary information with accurately, completely, sufficiently and in a timely, equitable and fair manner to all stakeholders, including giving the opportunity for all related parties to access and inquire information.
2. Perform duties with full knowledge and ability as a professionalism; as well as, regularly study for knowledge to develop work efficiency regularly.
3. Perform duties with integrity that based on the principle of equality.
4. Perform duties by adhering to the interests of shareholders and stakeholders.
5. Maintain the confidentiality of the company, by not using inside information for personal gain and others.
6. Provide channels for disclosure of information or sources of information to users of information equally, such as through the information system of the Stock Exchange of Thailand. Office of the Securities and Exchange Commission and / or the Company's website etc.
7. Do not disclose information that has no conclusion, or under negotiation which is still uncertain.
8. Abstain from providing information about the performance to shareholders, investors, analysts and stakeholder, not less than 15 days before the disclosure of financial statements to the public through the information system of the Stock Exchange of Thailand.
9. Operate in accordance with the relevant laws and regulations according to the regulations of the Securities and Exchange Commission (SEC), the Stock Exchange of Thailand (SET) and regulatory agencies that related to the business of the Company.
10. Create confidence, enhance image and good attitude of the Company; as well as, build good relationships with all stakeholders.
11. Assign the Chief Executive Officer and the Chief Executive Officer to determine the person to provide information to shareholders, investors, analysts and stakeholders.
12. The executives and employees that involved in investor relations work need to comply with the good corporate governance policy regarding the trading of the Company's securities, by not trading the Company securities since the date of acknowledging the financial statements of the

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|   |   | Page           | 4 / 5          |

Company until disclose the financial statements to the public through the information system of the Stock Exchange of Thailand.

13. If there is any violation of this Investor Relations Ethics, it must to report violations and consequences without delay to the Chief Executive Officer and / or the Executive Committee of the Company. (As the case may be)

## 5. Policy Review

The Investor Relations Ethics Policy need to be reviewed and submitted to the Board of Directors for approval every year.

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|   |   |  | Page           | 5 / 5          |

#### 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 | Rewritten    | 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<br>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<br>64-037 | 4.0                     | 12 NOV 2021 | Reviewed     | To comply with the principles of the supervising agency and the current operations | -                    |