



TCoC Newsletter

D. OUR EMPLOYEES – Insider trading

Issue November 2024

TATASTEEL (THAILAND)



Our employees must not indulge in any form of insider trading nor assist others, including immediate family, friends or business associates, to derive any benefit from access to and possession of price sensitive information that is not in the public domain. Such information would include information about our company, our group companies, our clients and our suppliers.

This policy provides the standards of TSTH (the “Company”) on trading of the Company’s securities while in possession of confidential information.

This policy applies to all directors of the Company and its subsidiaries, management team and key employees of the Company. All employees of the company (including management team) covered under this policy will be addressed as “Designated Employees”.

Blackout Periods

All designated employees are prohibited from trading in the Company’s securities during blackout periods as follows:

(a) Quarterly Blackout Periods

Trading in the Company’s securities is prohibited during the period beginning two weeks before the board meeting date in each fiscal quarter and ending at the close of business on the second day following the date the Company’s financial results for such fiscal quarter are publicly disclosed. During these periods, designated employees generally possess or are presumed to possess material non-public information about the Company’s financial results.

(b) Other Blackout Periods

From time to time, other types of material non-public information regarding the Company (such as negotiation of mergers, acquisitions or dispositions or new product developments) may be pending and not be publicly disclosed. While such material non-public information is pending, the Company may impose special blackout periods during which designated employees are prohibited from trading in the Company’s securities. If the Company imposes a special blackout period, it will notify the Designated Employees affected.

Trading window

Designated employees are permitted to trade in the Company’s securities when no blackout period is in effect. Generally, this means that designated employees can trade during the period beginning at the close of business on the second day following the date the Company’s financial results for such fiscal quarter are publicly disclosed and ending at the close of beginning two weeks before the board meeting date in each fiscal quarter. However, even during this trading window, a designated employee who is in possession of any material non-public information should not trade in the Company’s securities until the information has been made publicly available or is no longer material.

Designated employees who wish to trade in the Company’s securities are requested to notify the Board of Directors of their intention at least 24 working hours before the proposed transaction. For this, information can be sent in writing to Company Secretary, Ms. Somjai Jarukitcharoon at somjaij@tatasteelthailand.com. If no response is received within 24 hours of written request, the request is deemed approved.

Whistleblower Channels :

TCoC Helpline : Monday – Friday at 8:30 – 17:30 hrs. (except Public Holiday)

1-800-292-777 (Toll Free) or 0-2677-2800

email : tell@thailand-ethicsline.com

Post: TCoC Helpline Services, P.O. Box 2712 Bangrak Post Office, Bangkok 10500

Ethics Counselor : Ms. Somjai Jarukitcharoon

Tel. : 0-2937-1000 Ext. 3210

email : somjaij@tatasteelthailand.com

