



## Code of Ethics of Investor Relations | TTW Public Company Limited

TTW Public Company Limited has prepared the Code of Ethics of Investor Relations as a practice in the performance of the Investor Relations, to set out guidance or framework of practice in case of any difficult problem or issue for making decisions based on the fundamental principles of accuracy, adequacy, timeliness, equality, fairness, integrity, honesty and compliance with the Company's good corporate governance policy and principles, the Investor Relations should conduct themselves as follows:

**1) Accurate, adequate and timely disclosure of essential and necessary information for investment decisions**

- (1) Disclose information accurately, adequately and timely under the rules of the Stock Exchange of Thailand and the Office of the Securities and Exchange Commission (SEC).
- (2) Exercise discretion in giving information with due care and prudence; refrain from disclosing trade secrets and inside information, or such information which may disadvantage the Company's business competition with any person or the public should the Company have not yet disclosed such information to the Stock Exchange of Thailand.
- (3) In the case where the Company possesses other information which may affect the decision-making on investment in securities, the Company may disclose additional information to the public other than that specified by the Stock Exchange of Thailand, which must be clear and adequately comprehensive without misleading investors on investment in the Company's securities; Such as Capital increase, Dividend payout/Not to pay dividends, Merger and Acquisition and Disposition of Assets, etc.
- (4) In case of any rumor or information leakage, promptly clarify facts to the public under the requirements of the Stock Exchange of Thailand to ensure correct understanding and address any other essential supporting conditions.
- (5) The information must be accurate and up-to-date. If the information is found to be inaccurate to the public. It must be resolved as soon as possible.
- (6) Determine information disclosure channels or sources of information to ensure users' equal access, as follows:
  1. Disclosure via the system of the Stock Exchange of Thailand.



2. Release of the Company's business information report (MD&A) in case of any change of more than 20 percent in the Company's operational results.
3. Printed materials, such as Annual Report, Sustainability Development Report, the Company's operational results report, quarterly IR presentations.
4. Meetings with analysts or investors (Physical Meetings and Virtual Meetings).
5. Electronic media, such as Website, e-mail, Facebook, Instagram, LinkedIn.
6. Site Visits.
7. Local and international Roadshows.

## **2) Retention of inside information**

- (1) Refrain from using inside information for personal advantage and others to unduly seeking personal gains or others.
- (2) Determine and restrict persons' access to the Company's inside information, provided that the Investor Relations with access to inside information shall not disclose such information to others until the information has been disclosed to the public by various rules.
- (3) Investor Relations must keep and disclose inside information in compliance with the relevant rules and regulations before disclosure to any specific group of investors.
- (4) Determine disclosure timeframe to investors/analysts, as follows:
  1. Quarterly operational results within 45 days following the date of the financial statements.
  2. Annual operational results within 60 days following the date of the financial statements.
  3. Form 56-1 One Report within 3 months from the end of the accounting period.
- (5) Determine the "Quiet Period" that is, a period during which the investor relations do not conduct any direct investor relations activities, including meetings or calls with any investor or analyst two weeks before results announcements.
- (6) The Board of Directors, the management, and IROs are prohibited trade the company's stock one calendar month before the announcement date until one calendar day after the announcement date.



**3) Equal and fair disclosure of information by means of access and inquiry by all parties concerned**

- (1) Specify types of information and disclosure timeframe and notify stakeholders of the disclosure to ensure equal access through various forms, such as Site Visit, Roadshow, Analyst Meeting, Annual General Meeting of Shareholders, Press Conference, as appropriate for each group, and refrain from causing any disadvantage and opportunity on investment to any party.
- (2) Determine the content of information in the disclosure for the Investor Relations to practice for the equal understanding of all parties concerned, to ensure as follows:
  1. Accuracy and clarity.
  2. Adequacy of financial and material information for investors to be able to assess merits.
  3. Plain language for general people's understanding.
- (3) As for the disclosed information, whether in writing or verbally, the Investor Relations may answer questions or provide additional information to those who are interested personally or any specific group, subject to equal treatment without discrimination.
- (4) In disclosing different information, Investor Relations may provide in-depth information per the purpose of use, with different levels of details, depending on the objective and appropriate use of information by each investor.
- (5) Disclose presentations in specific meetings to the public, e.g., Roadshow Presentation, Analyst Presentation, and Annual General Meeting of shareholders on the Company's website and/or Company's Social Media as soon as possible after the meetings.
- (6) Participate in activities organized by relevant agencies as channels to disclose information, to directly meet with investors and listen to their opinions, as well as create a good relationship with investors through various activities.
- (7) As for communication of information in case of any issues leading to misunderstanding and it is necessary to clarify the issues, the Investor Relations shall notify the information through the Stock Exchange of Thailand's system to prevent disclosure of information to any specific group.



## Treatment towards Stakeholders

Stakeholders	Practices
Investors	<ol style="list-style-type: none"> <li>1. Equally, treat both major and minor investors.</li> <li>2. Provide information to individual investors at the level equivalent to analysts and institutional investors.</li> </ol>
Analysts and Funds	<ol style="list-style-type: none"> <li>1. Invite and equally allow analysts, fund managers or representatives from all securities companies to attend analyst meetings.</li> <li>2. Respect works and opinions of analysts, but clarify accurate information in respect of any use or provision of incorrect information.</li> <li>3. To encourage the institutional investors' attending the Annual General Meeting of shareholders, the Investor Relations Unit coordinated with the institutional investors on their submission of registration documents to TTW 7-14 days in advance for document checking in order to facilitate the administrative procedures on the actual meeting day.</li> </ol>
Mass Media	Invite and equally allow all mass media to attend press conferences and provide information as appropriate.
Authorities	Provide cooperation by giving information to the authorities per request.
Internal Staff	<ol style="list-style-type: none"> <li>1. Coordinate for the Company's management to meet with stakeholders as appropriate.</li> <li>2. Report to the Board of Directors and management on various information which may create value added to the Company.</li> <li>3. Communicate with staff in the organization regarding the Code of Ethics of Investor Relations to encourage staff engagement in the same practice as Investor Relations.</li> </ol>
Other Stakeholders	<ol style="list-style-type: none"> <li>1. Provide information to other stakeholders at an equivalent level, except for any other necessity in the business operations.</li> </ol>



- 4) Performance of duties with integrity in the profession based on equal treatment without any discrimination and commission as personal incentives for personal gains other than for the benefit of the Company and relevant stakeholders
- (1) Strictly comply with the Company's work rules, policies and code of conduct of staff; avoid any act which may give rise to a conflict of interests with the Company, such as the use of the Company's property, information, and connection in the performance of duties as Investor Relations for personal gains.
  - (2) Conduct themselves and comply with the Code of Ethics of Investor Relations in the capacity as Investor Relations.
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