INSIDER INFORMATION PREVENTION & SECURITIES TRADING POLICY

THAI UNION FEEDMILL PUBLIC COMPANY LIMITED

Revision on 30 October 2026

INSIDER INFORMATION PREVENTION AND SECURITIES TRADING POLICY

Thai Union Feedmill Public Company Limited (the "Company") conducts its business with due regard to shareholders, investors, stakeholders, the economy, and society. Therefore, in order to govern the conduct of directors, executives, and employees regarding the use of the Company's non-public inside information for personal benefit, and to comply with the Securities and Exchange Act B.E. 2535 (1992) (as amended) (the "SEC Act") and the Stock Exchange of Thailand's Regulations on Disclosure of Information by Listed Companies, the Board of Directors has approved this Insider Information Prevention Policy, as detailed below.

Objectives

1. To establish rules and guidelines governing securities trading by directors, executives, employees, and other persons as designated by the Company.
2. To ensure that directors, executives, and employees comply with the Securities and Exchange Act B.E. 2535 (1992) and other relevant regulations concerning securities trading.
3. To maintain the confidence and trust of the Company's shareholders and stakeholders.

Scope

1. This Policy applies to directors, executives, employees, and persons designated by the Company.
2. Securities trading under this Policy refers to transactions involving the securities of Thai Union Feedmill Public Company Limited.

Definitions

Inside Information means material information that has not yet been disclosed to the public and may affect the price or value of the Company's securities.

Top Four Executives or Equivalent means executives as defined under the Notification of the Capital Market Supervisory Board No. SorJor. 38/2561, comprising the first four highest-ranking executives below the Chief Executive Officer (or equivalent position), including all executives at a level equivalent to the fourth-ranking executive.

Securities Trading means the acquisition, transfer, or disposal of legal interests in securities, including the exercise of stock options or rights under warrants to purchase shares.

Securities means shares (ordinary and preferred), debentures, rights to purchase shares, derivatives (such as futures or options), warrants to purchase shares or debentures, and other financial instruments that are tradable in financial markets.

Employee means all employees of the Company, including both permanent and temporary employees engaged by the Company.

Impact on Securities Price means any impact that may cause the Company's securities price to increase, decrease, remain unchanged, or fluctuate significantly.

Designated Persons mean persons whose position or duties may enable them to access and/or possess the Company's inside information, including:

1) Directors.

2) Top four executives or equivalent.

3) Executives and employees in departments with access to inside information, as notified by the Company Secretary for the purpose of preparing securities holding reports.

4) Persons attending meetings of the Board of Directors, Board Committees, and/or other Company meetings involving external parties where discussions or negotiations include inside information, as notified by the Company Secretary for the purpose of preparing securities holding reports.

Duties and Responsibilities

1. The Board of Directors delegates oversight of this Policy to the Nomination, Remuneration and Corporate Governance Committee to ensure that directors, executives, and employees comply with the prescribed rules and guidelines regarding the Company's securities trading.
2. The Company Secretary is responsible for supporting the Board in communicating, monitoring, and overseeing compliance with this Policy.
3. All executives are responsible for ensuring that their subordinates understand the importance of this Policy and comply with it strictly.
4. Directors, executives, and employees must strictly comply with this Policy when trading the Company's securities and communicate this Policy to their spouses, persons living together as spouses, and minor children to promote transparency and good corporate governance.

Guidelines

1. **Prohibition of Insider Trading**

   Directors, executives, employees, designated persons, and any other person who has knowledge of and/or possesses the Company's inside information are prohibited from:

1) Buying, selling, transferring, receiving transfers, or otherwise dealing in securities, or entering into derivative contracts related to securities, in a manner that takes unfair advantage of others or uses inside information for personal benefit, as prescribed by applicable laws and regulations.

2) Disclosing inside information to any other person by any means where the disclosing person knows or should reasonably know that the recipient may use such information to buy, sell, transfer, receive transfers, otherwise deal in securities, or enter into derivative contracts involving securities for unfair advantage or personal benefit, as prescribed by applicable laws and regulations.

2. Blackout Period

Directors, executives, and designated persons are prohibited from trading the Company's securities during the period of one month prior to the disclosure of operating results, quarterly financial statements, and annual financial statements, as well as during any additional blackout periods that the Company may designate from time to time.

Directors, executives, and designated persons may engage in securities transactions during such blackout periods only where exceptional circumstances exist, such as severe financial hardship, legal obligations, or court orders. In such cases, a written explanation must be submitted and prior approval obtained from the Company before proceeding.

Where an exception is approved, the applicant must complete the securities transaction within three business days from the date of receiving written approval and must provide copies of the request and approval documents to the Company Secretary for record-keeping purposes.

3. Advance Notification Prior to Securities Trading

1) Directors, executives, designated persons, and other employees who have knowledge of and/or possess the Company's inside information and intend to trade the Company's securities must notify the Company Secretary or a person designated by the Board of Directors via email or other designated channels at least one day prior to the intended transaction.

2) The Company Secretary shall notify relevant persons in advance of blackout periods to enable proper compliance with the applicable rules and requirements.

4. Reporting of Securities Holdings

1) Directors and Top Four Executives or Equivalent

Directors and top four executives or equivalent must report their securities holdings, including holdings of their spouses, minor children, and persons living together as spouses, to the Securities and Exchange Commission of Thailand (SEC) within three business days from the date of any

purchase, sale, transfer, or receipt of transfer of the Company's securities. A copy of such report must also be submitted to the Company Secretary on the same day it is filed with the SEC.

2) Designated Persons

Designated persons other than directors and top four executives or equivalent who are instructed by the Company Secretary to prepare securities holding reports (including holdings of spouses, minor children, and persons living together as spouses) must:

- Submit an initial securities holding report within seven business days from the date of notification by the Company Secretary; and
- Submit an updated securities holding report within three business days from any change in securities holdings.

5. Exempt Transactions

This Policy does not apply to the following situations:

1) Acceptance of a tender offer for a business takeover.

2) Exercise of stock options or rights under warrants to purchase shares or debentures granted under the Company's schemes, provided that the securities acquired through such exercise must be held until the applicable blackout period has ended.

6. Other Restrictions on Securities Trading

1) The Company encourages designated persons and employees to invest in the Company's securities on a long-term basis and discourages short-term speculative trading.

2) Directors, executives, and designated persons should avoid:

- Speculative trading in the Company's securities, which may signal to the market a lack of confidence in the Company and/or its subsidiaries.
- Trading derivatives, such as futures or options, referencing the Company's securities for short-term speculation, including any trading based on inside information.

3) Directors, executives, employees, and designated persons must not disclose inside information to others or prepare any report or statement that may create a misunderstanding regarding the Company's financial position, operating results, securities prices, or any other information that could affect the price of the Company's securities or investment decisions.

4) Directors, executives, employees, and designated persons are prohibited from using another person's securities trading account, whether directly or indirectly, to trade the Company's securities for the purpose of concealing the acquisition, holding, or disposal of such securities.

In Case of Doubt

If any director, executive, employee, or designated person has questions regarding this Policy, is uncertain whether information in their possession constitutes material information that has already been publicly disclosed or is unsure whether securities trading is permissible in a particular situation, they should consult the Company Secretary before undertaking any securities transaction.

Violation of the Policy and Applicable Laws

Any director, executive, or employee who violates this Policy shall be subject to disciplinary action in accordance with the Company's regulations, which may include termination of employment.

Such persons may also be subject to civil and criminal liabilities under the Securities and Exchange Act B.E. 2535 (1992), as well as other applicable laws, regulations, and requirements imposed by relevant governmental and regulatory authorities.

Policy Review

The Company shall review this Policy on a regular basis. Any amendment or revision shall be submitted to the Nomination, Remuneration and Corporate Governance Committee and subsequently to the Board of Directors for approval.

Confidentiality

Information relating to securities trading by directors, top four executives or equivalent, and designated persons shall be maintained confidentially and securely, except where disclosure is required pursuant to a written request from a government authority, the Stock Exchange of Thailand, or a court order.

This Policy was approved by the Board of Directors and shall become effective on 30 October 2026.

-Signature-

(Mr. Rittirong Boonmechote)

Chairman of the Board of Directors