



## **Confidentiality Policy**

### **TEAM Consulting Engineering and Management Public Company Limited and Subsidiaries**

---

TEAM Consulting Engineering and Management Public Company Limited and its subsidiaries (“the Company”) realize the importance of data protection and use of inside information. To align with the Company's operational objectives, the Company has established this Confidentiality Policy to be a guideline on data management and prevention of leakage, including efficient operations in accordance with laws and regulations, and maintaining the trust of all stakeholders.

#### **1. Confidentiality Policy**

1.1 The Company must maintain the confidentiality of non-public information, Personal Data, and Sensitive Personal Data of employees, customers, suppliers, and stakeholders. Data management and usage must be restricted to relevant personnel, except in cases where disclosure is permitted by law.

1.2 Directors, executives, employees, and related persons must maintain the confidentiality of inside information, confidential documents, and/or trade secrets, including plans, operational processes, technological Information and Know-How Related to Internal Management Systems and Project Operations, and inventions which are the property of the Company. This information must not be disclosed to any persons or used for personal gain or the benefit of related persons, both during and after employment.

1.3 The Company establishes measures, procedures, and methods to ensure the security of the Company's data, documents, records, and information. This includes effective and robust data management guidelines to prevent the unintentional leakage or disclosure of confidential information.

1.4 In cases where third parties are involved in operations related to the Company's inside information, a Confidentiality Agreement must be executed, and the Company's policy must be adhered to prior to any data access.

#### **2. Compliance with Laws and Regulations**

Directors, executives, employees, and related persons must strictly comply with all applicable laws, regulations, policies, and practices related to confidentiality.

### **3. Preventive Measures**

To ensure the smooth implementation of this policy, the Company has established the following preventive measures:

3.1 Implement security and safety systems in the workplace to protect confidential files or data files and documents.

3.2 Restrict access to non-public information to only top management or only personnel who are relevant and necessary. Employees must be informed of the confidential nature of the information and the restrictions on its use.

3.3 The Company will maintain and regularly update its computer and information systems usage policy to reflect changes in laws and regulations from regulatory bodies, as well as changes due to technological advancements and internal developments within the Company.

3.4 The Company employs internationally recognized control systems, such as assigning usernames and passwords for accessing the Company's various systems based on roles, responsibilities, and scope of work, including access and approval authority, to be consistent with the Company's operations.

### **4. Penalties**

In the event of a violation of these regulations, the Company will take disciplinary action to consider and impose appropriate penalties for the case, namely verbal warnings, written warnings, salary deductions, suspension, termination, and legal action in cases of illegal activity.

If any violations are observed, they can be reported through the whistleblowing and complaint channels specified by the Company.

This Confidentiality Policy is effective from February 26, 2025 onwards, and all employees and related persons are required to acknowledge and comply with it.

*- Rapee Phongbupakicha-*

(Mr. Rapee Phongbupakicha)

Chairman of the Board