

Insider Information Management Policy

The company emphasizes on the prevention of insider information misuse so that directors, management, staff and related person will not take advantage over the acquired information for their own or others' benefit. Such actions might cause the conflict of interest and effect on the company's reputation. In order to comply with law and regulations regarding to securities and exchange, the company has set the policy as follow.

"Insider Information" means non-public information which has impact on the change of company's security price and value.

1. The company has duty on disclosing news regarding to material operation immediately and thoroughly by channels and methods specified by the Stock Exchange of Thailand to ensure equal access of the investors in timely manner.
2. Directors, managements, staff of the company including other person working with the company who access or possess insider information must:
 - 2.1 Managements and staff sign the non-disclose information agreement as a part of hiring contract.
 - 2.2 Maintain insider information of the company with due care and safe in order to prevent its leakage.
 - 2.3 Not disclose insider information to any other person not being engaged with assigned work in order to prevent usage of insider information for benefits of such person or others.
 - 2.4 Not purchase or sell securities relating to insider information which he or she gains more advantage than other persons not knowing insider information.
 - 2.5 The other person engaging in specific projects during the negotiation or non-disclosed to public which could have influence to the change of prices of the company's securities must sign confidential agreement and maintain until the project is disclosed to public.

This is due to the fact that there might be the change of the securities price and value of the company and other related listed companies or might affect to investment decision.

3. The company's directors and top executive are required to notify chairman and/or the company's secretary regarding to the transaction of purchase or sell the company's stock at least 1 day prior to the transaction date.
4. The company must specify the information classification to manage and secure the information safety based on the IT and information security and safety policy. This action must maintain to prevent information leakage and misuse for personal or other person' insider trading.
5. The information disclosure must be taken by authorized person. The information dissemination must be complied with scope of duty and assigned responsibility.

6. The directors, management and assigned staff must not make appointment or giving information regarding to the company's upcoming operating result to investors and analysts at least 10 working days prior to the operating result announcement date.
7. Any director, management and staff failing to comply with this policy is considered breaking discipline and subject to punishment including those prescribed by laws if it is breach of laws.
8. The directors, executives and employees of the company have their own duties to strictly comply with their charters, code of conduct and corporate governance handbook of the company as well as the rule of using insider information under the Securities and Exchange Act B.E. 2535 (and its amendments) ("Securities Act") and Public Limited Companies Act B.E. 2535 (and its amendments) and other applicable rules.

Blackout period measurement

The Company's directors, executives* including persons holding an executive position in accounting or finance at a divisional manager or equivalent level, employees of the offices relating to insider information including their related person* knowing insider information are prohibited from trading the securities during a period of 1 month before disclosure of any financial statements and other material information and within 24 hours after such disclosure. This includes other period occasionally specified by the company. (Blackout Period)

Reporting of Holding and Changing of Holding of Securities and Derivatives

1. The Company will provide knowledge to the board of directors and executives of the company including persons holding an executive position in accounting or finance at a divisional manager or equivalent level regarding their duties on preparing, disclosing and submitting the reports on their holding and changing of holding of securities and derivatives, and their spouse or cohabiting couple and minor children to the Office of the Securities and Exchange Commission ("Office of SEC") according to Securities Act, Notification of the Securities and Exchange Commission and applicable notifications of Capital Market Supervisory Board including punishment according to relevant laws.
2. The board of directors and executives of the Company including persons holding an executive position in accounting or finance at a divisional manager or equivalent level of the Company must prepare, disclose and submit the reports on holding and changing of holding of their securities and derivatives and/or their

* Based on the definition specified by The Stock exchange of Thailand and The Securities and Exchange Commission

related person to the company secretary before every submitting to the Office of SEC in a form and within the following periods:

2.1 within 3 working days from the date of purchase, sale, transfer or acceptance of transfer of securities or derivatives in the case where the person with the duty to report is a director or an executive of the company, and in accordance with all of the following regulations:

(a) the Company shall report the names of the directors and executives through the Directors and Executives Information System according to the method specified by the Office of SEC in the Notification of the Office of SEC concerning Forms and Methods for Reporting or Changing the Information of Company Directors and Executives;

(b) the persons with the reporting duty report shall report purchase, sale, transfer or acceptance of transfer of securities or derivatives before having their names listed in the Directors and Executives Information System under (a).

2.2 within 7 working days from the date of purchase, sale, transfer, or acceptance of transfer of securities or derivatives in any case other than 2.1. And notify to the company's secretary to record the change and balance of individual securities holding to report in the next board of directors meeting.

The Report of Conflict of Interest

Directors and management have duty on preparing and reporting "The report of Conflict of Interest of the director and executive" in compliance with the Securities and Exchange Act B.E. 2535 (1992) and related laws. This report is annually used to govern the scope of conflict of interest. Directors and executive must prepare the report and notify the company's secretary of the change and report to the next board of directors' meeting.

This Insider Information Management Policy was approved by the board of director in the meeting no. 9/2022 held on December 16, 2022. The policy is effective starting from December 16, 2022 onwards.

(Mr. Sujarit Patchimnan)

Chairman