

Use of Insider Information Policy

of

Pinthong Industrial Park Public Company Limited

Pinthong Industrial Park Public Company Limited (the “**Company**”) places importance on the prevention of the misuse of the Company’s inside information by relevant persons. The Company has established a policy prohibiting directors, executives, employees, and staff of the Company, as well as persons who are presumed to have knowledge of or possess inside information under the Securities and Exchange Act B.E. 2535 (1992) (as amended) (the “**Securities and Exchange Act**”), from disclosing or using confidential information and/or inside information of the Company which has not yet been disclosed to the public, or from seeking any benefit for themselves or others, whether directly or indirectly, and whether or not any consideration is received. Such persons are also prohibited from trading in the Company’s securities by using inside information. In this regard, the Company has prescribed guidelines for the prevention of the misuse of inside information as follows:

1. The Company shall notify the directors and executives of the Company of their duties to report their holdings of securities and derivatives relating to the Company’s securities in accordance with Section 59 of the Securities and Exchange Act B.E. 2535 (1992) (as amended) (the “**Securities and Exchange Act**”), including those held by themselves, their spouses or cohabiting partners as husband and wife, and their minor children, as well as juristic persons in which such persons hold more than 30 percent of the total voting rights, and where such combined shareholding constitutes the largest proportion in such juristic person, whereby the shareholdings of spouses or cohabiting partners as husband and wife and minor children shall be included, to the Office of the Securities and Exchange Commission (the “**SEC Office**”), including any changes in the holding of securities and derivatives relating to the Company’s securities as a result of any purchase, sale, transfer, or acceptance of transfer of securities, as well as the penalties prescribed under the Securities and Exchange Act. In the event that there is any holding of securities or derivatives, or any change in such holdings, the directors and executives shall notify the Company Secretary in order to facilitate and coordinate the submission of reports on the holding of securities and derivatives to the SEC Office. In addition,

the Company requires that the holdings of securities and derivatives of directors and executives be reported at every meeting of the Board of Directors.

2. The Company requires directors and executives, including persons holding executive positions in the accounting or finance functions or equivalent positions, to prepare and submit reports on their holdings of securities and derivatives, including those of their spouses or cohabiting partners as husband and wife, and their minor children, as well as juristic persons in which such persons hold more than 30 percent of the total voting rights, and where such combined shareholding constitutes the largest proportion in such juristic person, whereby the shareholdings of spouses or cohabiting partners as husband and wife and minor children shall be included, to the Company Secretary within 30 days from the date of their appointment as directors and/or executives. They shall also report any changes in the holding of securities and derivatives within 3 business days from the date of any purchase, sale, transfer, or acceptance of transfer of such securities. The Company Secretary shall summarize the reports on the holding of securities and any changes therein and submit the same to the Board of Directors' meeting for acknowledgement on a regular basis every six months.

3. The Company requires directors and executives, including persons holding executive positions in the accounting or finance functions at the level of department manager or above or equivalent, as well as relevant employees, including persons who are presumed to have knowledge of or possess inside information under the Securities and Exchange Act B.E. 2535 (1992) (as amended) (the "Securities and Exchange Act"), who are in possession of material inside information that may affect changes in the price or value of the Company's securities, to refrain from trading, making offers to purchase or sell, or soliciting others to trade in, make offers to purchase or sell, the Company's securities, whether directly or indirectly, during the period prior to the disclosure of the Company's financial statements or disclosure of information relating to the Company's financial position and status, until such information has been disclosed to the public. Such restriction shall apply throughout the embargo period (the "Embargo Period"), which means a period of one (1) month prior to, and until, the date of the announcement of the Company's quarterly and annual financial results. The Company shall notify the directors and executives in writing to refrain from trading in the Company's securities for at least one (1) month prior to the disclosure of such information to the public, and they should wait for at least 24 hours after such public disclosure before trading. In

addition, such persons are prohibited from disclosing such material information to any other person.

4. Directors, executives, and employees of the Company and its subsidiaries, including any persons deemed to possess inside information under the Securities and Exchange Act B.E. 2535 (1992) (as amended) (the “Securities and Exchange Act”), are strictly prohibited from using any non-public information of the Company or its subsidiaries that could affect the price of the Company’s securities for the purpose of trading in, or recommending or inducing others to trade in, the Company’s securities, whether directly or indirectly, and whether for their own benefit or for the benefit of others or disclose such material non-public information to any other person where such disclosure is likely to result in trading in the Company’s securities, regardless of whether any benefit is received in return.

5. The Company requires that directors, executives, and employees of the Company and its subsidiaries shall not disclose any inside information of the Company or its subsidiaries, nor use their positions in the Company and/or its subsidiaries, or any inside information or material information obtained or learned in the course of their duties with the Company and/or its subsidiaries, which has not been disclosed to the public, for any improper benefit, or disclose such information to any third party for their own benefit or for the benefit of others, whether directly or indirectly, regardless of whether any benefit is received in return.

6. The Company requires that directors, executives, and employees of the Company and its subsidiaries shall comply with the rules governing the use of inside information under the Act, as well as any other applicable laws and regulations.

7. The Company requires directors, executives, and employees of the Company and its subsidiaries, as well as former directors, executives, and employees, to maintain the confidentiality of the Company’s and its subsidiaries’ confidential information and/or inside information, as well as confidential information of business partners, obtained in the course of their duties. Such persons are prohibited from using such information for the benefit of other companies or disclosing it to any third party, even if such disclosure does not cause damage to the Company, its subsidiaries, or its business partners.

Any violation of the above policies shall be deemed a disciplinary offence under the Company’s work rules and regulations. The Company shall consider imposing disciplinary

actions as appropriate, which may include verbal warning, written warning, probation, and termination of employment.

This Policy on the Use of Inside Information was approved by the Board of Directors at its Meeting No. 3/2020 and became effective on 13 August 2020.

- Mr. Prasan Tanprasert -
Chairman of the Board of Directors