

## Insider Information Policy

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Dhipaya Group Holdings Public Company Limited (the “**Company**”) has a policy and procedure to supervise the directors, members of subcommittees, advisors, executives, and employees of the Company in using insider information that has not been disclosed to the public for their own interest.

### Guidelines

- Clause 1. The Company will educate its directors, members of subcommittees, advisors, and executives (in accordance with the definitions of the Office of the Securities and Exchange Commission), and the auditors of the Company, as well as the planner, the plan administrator, and the interim plan administrator under the law on bankruptcy, on the duty to report any change in the holding of securities and derivative by themselves, their spouse(s), de facto partners, minor children, and specified juristic persons, to the Office of the Securities and Exchange Commission in accordance with the criteria specified in the Securities and Exchange Act B.E. 2535 (1992) (including any amendment thereto).
- Clause 2. The directors, members of subcommittees, advisors, and executives (in accordance with the definitions of the Office of the Securities and Exchange Commission), and the auditors of the Company, as well as the planner, the plan administrator, and the interim plan administrator under the law on bankruptcy, are required to prepare and disclose the report of any changes to the holding of securities and derivatives by themselves, their spouse(), de facto partners, minor children, and specified juristic persons, to the Office of the Securities and Exchange Commission in accordance with the criteria specified in the Securities and Exchange Act B.E. 2535 (1992) (including any amendment) and submit a copy of the report to the Company Secretary on the same day of submitting this report to the Office of the Securities and Exchange Commission.
- Clause 3. The directors, members of subcommittees, advisors, and executives (in accordance with the definitions of the Office of the Securities and Exchange Commission), and

the relevant persons who become aware of any insider information relating to the balance sheets, the financial position, or the operating results of the Company, as well as other material insider information that affects a change to the price of securities, are required to refrain from trading the securities of the Company during the period prior to the disclosure of the financial statements or the disclosure of the financial position and the position of the Company. In addition, they are prohibited from disclosing such material information to any third person until the Company has disclosed such information to the public. In this regard, the Company will issue a letter to notify the directors, members of subcommittees, advisors, and executives (in accordance with the definitions of the Office of the Securities and Exchange Commission) to refrain from trading in securities of the Company for at least one month prior to the public disclosure, and at least 24 hours after the information has become public.

- Clause 4. The directors, members of subcommittees, advisors, and executives (in accordance with the definitions of the Office of the Securities and Exchange Commission) and employees of the Company are prohibited from using any insider information of the Company that will affect or may affect any change to the prices of the securities of the Company, and that has not been disclosed to the public, of which they may become aware as a result of their position or status, on the purchasing, selling, offering to purchase or selling or soliciting others to purchase, sell, offer to purchase or to sell shares or other securities of the Company (if any), either directly or indirectly. Please note that this may damage the Company, irrespective of whether such an act will be for the benefit of themselves or for the benefit of others, or in respect of the disclosure of such information to others to perform such acts, whether or not any act is committed for any form of consideration.

- Clause 5. The directors, members of subcommittees, advisors, and executives (in accordance with the definitions of the Office of the Securities and Exchange Commission) and employees of the Company are prohibited from disclosing and/or exploiting the insider information or the confidential information of the Company, as well as the confidential information of its business partners, made available to them during the course of their duties, in any manner whatsoever, even though such act may not cause any damage to the Company and its business partners.
- Clause 6. The directors, members of subcommittees, advisors, and executives (in accordance with the definitions of the Office of the Securities and Exchange Commission) and employees of the Company has the duty to maintain the confidentiality of the confidential and/or insider information of the Company, and have the duty to use the insider information of the Company for the purpose of the business operations of the Company only. Accordingly, the directors, members of subcommittees, advisors, and executives (in accordance with the definitions of the Office of the Securities and Exchange Commission) and employees of the Company are prohibited from using the confidential information and/or the insider information of the Company for their own benefit or for others' benefit, either directly or indirectly, and irrespective of whether it is for any form of consideration or not.
- Clause 7. Any personnel who fail to comply with the Insider Information Policy will be subject to disciplinary action determined by the Company and/or to the sanctions of the law. Punishments will be assessed based on the intent of the action and the seriousness of the offence.
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