

# Measure of preventing misuse of insider info

## The Insider information policy

The Board of Directors has been aware of the importance of good corporate governance in order to run a business with transparency and prevent seeking individual benefit from the use of insider information which not disclose to the public, the company, therefore, set the insider information policy as follows;

1. Educated Directors, executives, the management in accounting and finance and employees about related legal and regulatory in order to be a pattern for them to follow strictly.
2. Educated Directors, executives, the management in accounting and finance about duty of initial reporting on their securities holding in the company also their spouse, people who live and cohabit together as husband and wife, their minor child and juristic person that they held shares more than 30 percent of all eligible vote according to section 59 to the Securities and Exchange Commission.
3. Directors, executives, the management in accounting and finance, are always required to initially report on their securities holding in the company also their spouse, people who live and cohabit together as husband and wife, their minor child and juristic person that they held shares more than 30 percent of all eligible vote to company secretary before send to the Securities and Exchange Commission within 30 days of the date on which they are appointed. They are also required to report on any changes in securities holdings as a result of the purchase, sale, transfer or acceptance of transfer of securities within 3 business days of the date of any changes.
4. Directors, executives, the management in accounting and finance, employees and any related persons who acknowledge the significant insider information which may affect to the change of securities' pricing, shall be prohibited from trading company's shares as well as be prohibited from disclose significant insider information to anyone at that time and prior to the release of the company's financial statements or financial status and the company's status until the release of the company's disclosure. The company shall inform all concerned persons in writing of the silent period, which is at least 30 days prior to the release of the company's disclosure, and 24 hours after the release.
5. Penalties for insider trading shall be imposed for any breaches e.g. caution, suspension and dismissal depends on intention and effect of the action. Moreover, violation of the prohibition on insider trading can result in a prison sentence and civil and criminal fines for the individuals and the entities who commit the violation.

## Measure of preventing misuse of insider information by the management officers

1. To prevent misuse of insider information, each department/section shall not disclose any information of one's own department/section to any other departments/sections or to other parties not entitled to that information.
2. The management officers who are entitled to the company's financial reports/information shall not seek any benefits from that information prior to public disclosure. One of the rules to prevent misuse of information is that the management officers shall not engage in security trading for one month before public disclosure of the company's financial statements.
3. All directors and management officers are required to report on the company's shares hold by them as specified in Section 59 and in accordance with Announcement of Securities Exchange Commission no. Sor.Jor.14/2540 about report and disclosure of shareholding as dated May 12, 1997, and the requirements of SET. The penalty for not following the rules and requirements is described in Act of Securities and Securities Exchange B.E. 2535. Besides, any directors and management officers who break the rules are subjected to penalization according to the company's Regulation ie. receiving verbal warning, written warning, suspension, or terminating employment, as the case may be.

At the same time, the company also developed internal control system regarding inside information, by applying information technology system to classify inside information access level for each employee level, through the setting of ID code for accessing such information.

## Securities Trading Policy

Eason & Co Public Company Limited is committed to treating all of its shareholders with transparency and fairness in accordance with good corporate governance principles. In order to achieve this, the Board of Directors has adopted the following Securities Trading Policy as follows;

1. Compliance with the law
  - 1.1 All directors, executives and employees must comply with the insider trading prohibition, as defined in the Securities and Exchange Act, B.E.2535, at all times.
  - 1.2 Any director, executive or employee who knows or possesses inside information related to a securities issuing company must not:
    - (1) Purchase or sell securities or enter into a derivatives contract related to securities for their own or another person's benefit.

- (2) Disclose inside information to other persons, either directly or indirectly and by any means, while one knows or ought reasonably to know that the recipient of such information may exploit it for trading securities or entering into a derivatives contract related to such securities, either for their own or another person's benefit.

## 2. Policy on trading of the company's securities

### 2.1 Designated Persons

2.1.1 "Designated persons" are the persons who, because of their positions or responsibilities, have access to the Company's inside information. (This term includes their spouses and minor children, as well as any juristic person in which the aforementioned persons hold an aggregated amount of shares exceeding 30% of its total voting rights if this amount constitutes the largest proportion of the shareholding) These include:

- (1) Directors
- (2) Senior executives
- (3) Executives and employees who have access to the company's inside information, such as members of Portfolio Management & Investor Relations, Corporate Accounting, Corporate Finance, Venture Capital & Business Development, Internal Audit, Legal and Compliance Office
- (4) All executives and employees who participate in the meetings of the company's board of directors and/or its sub-committees
- (5) Any other person whom the compliance office and related persons (e.g. supervisor or head of unit) have mutually agreed to define as such

2.1.2 The office of managing director responsible for maintaining the register of designated persons and reviewing it on an annual basis, as well as notifying these persons and their heads of department when their names are added or removed

### 2.2 Blackout Periods

2.2.1 All designated persons are prohibited from trading the company's securities for a period of thirty (30) days prior to the disclosure or publication of the quarterly and annual financial statements, or any other period that the company might specify from time to time.

2.2.2 In exceptional circumstances, a designated person may sell the company's securities during the blackout period if he or she suffers severe financial hardship or has to meet legal or regulatory requirements, especially under a court order. In this case, the designated person must submit a written request,

explaining his or her reasons for selling the securities, to one of the following persons for approval:

- (1) The Chairman of the Board (in the case of a director or the company secretary)
- (2) The Chairman of the Audit Committee (in the case of the Chairman of the Board)
- (3) The Chief Executive Officer (in the case of any designated person other than a director, executives and employees)

A copy of the request must also be submitted to the company secretary.

2.2.3 The company secretary will publish the dates of every blackout period in advance in order to help the designated persons comply with this requirement

## 2.3 Prior Notification for Trading

2.3.1 Any designated person who intends to trade The company's securities must notify the Board of Directors at least one day in advance

2.3.2 The designated person must notify to the company secretary no later than 10.00 a.m. on the business day before the intended date of transaction.

2.3.3 Upon receipt of the notification, the company secretary shall determine whether the proposed trade by the designated person is within the terms of this policy.

2.3.4 Each notification can be submitted via email.

## 2.4 Report of Securities Holdings

### 2.4.1 Initial reporting

All designated persons must report their holdings of the company's securities to the company secretary as follows;

- (1) Report of Directors' and Executives' must be submitted within seven (7) days of appointment
- (2) Any designated person must be submitted within seven (7) days of notification by the company secretary

### 2.4.2 Reporting of changes

All designated persons must also report any changes in their holdings of the company's securities to the company secretary

### 2.4.3 Reporting by directors and executives

All directors and executives responsible for completing disclose their holdings in the company's securities and any changes thereof, and submitting to the Office of the Securities and Exchange Commission in compliance with Section 59 of the Securities and Exchange Act, B.E.2535, and all relevant notifications

## 2.5 Trading Exemptions

### Shares holding of the Board of Directors in 2022

No.	Name	No. of Shares			
		Dec 31, 2021	Changed	Dec 31, 2022	%
1.	Mrs. Pismai Boonyakiat	-	-	-	-
2.	Mr. Jane Wongissariyakul	-	-	-	-
3.	Ms. Thipawan Uthaisang	-	-	-	-
4.	Prof.Dr. Tharapong Vitidsant	-	-	-	-
5.	Mr. Sanan Eksangkul	19,855	-	19,855	0.004
6.	Ms. Petcharat Eksangkul	8,497,067	-	8,497,067	1.499
7.	Mr. Sanit Eksangkul	2,826,808	-	2,826,808	0.499
8.	Mr. Wichai Eksangkul	1,231,111	-	1,231,111	0.217
	Spouse	19,001	-	19,001	0.003
9.	Ms. Sirinun Eksangkul	784,336	-	784,336	0.138
	<b>Total</b>	<b>13,138,674</b>	<b>-</b>	<b>13,138,674</b>	<b>2.317</b>

o had no observations on internal control