

## Insider Information Policy

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Pro Inside Public Company Limited

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The Board of Directors realizes the importance of using the Company's material and non-public information for personal gain. Therefore, to protect the interests of shareholders and retail investors, promote transparency in the use of inside information, and prevent the seeking of personal gain from the use of such inside information, the Company has the following guidelines for directors, executives, and employees to follow:

1. Directors, executives and employees of the Company must keep the secrets and/or internal information of the Company, must not disclose or seek benefits for themselves or for the benefits of others, whether directly or indirectly, including not trading, transferring or receiving transfers of the Company's securities by using the secrets and/or internal information of the Company and/or entering into any legal transactions by using the secrets and/or internal information of the Company that may cause damage to the Company, whether directly or indirectly.
2. Directors, executives and employees in units that receive inside information of the Company must not use such information before it is disclosed to the public and must not trade, transfer or receive transfer of the Company's securities during the period of 1 month before the quarterly financial statements and annual financial statements are disclosed to the public and at least 24 hours after the disclosure of such information.
3. Directors, executives, including those in accounting and finance positions, those responsible for operations, executives, employees, and family members of all such personnel are prohibited from knowing any inside information of the Company, which is a fact that is material to the change of the price of securities and has not yet been disclosed to the public, whether for the purpose of trading securities or persuading others to buy, sell, offer to buy or offer to sell the Company's shares, whether by themselves or through an agent, regardless of whether such action is for themselves or for others.
4. Directors, executives, including those in accounting and finance positions, those responsible for operations, executives, employees, and family members of all such personnel are prohibited from disclosing material facts regarding changes in the price of securities and that have not yet been disclosed to the public for others to do so and gain benefits in return.

**Inside information** means

1. Facts that are material to changes in the price or value of securities, which may affect investors' decisions to buy or sell the Company's securities, or may cause damage to investors who intend to invest in the Company's securities, and are information that cannot yet be disclosed to the public.
2. Information that is prohibited from being disclosed to the public.
3. Information that is prepared to be disclosed to the public, but has not yet reached the official disclosure deadline.

**Guidelines for Preventing the Use of Inside Information**

1. Provide knowledge to the Company's directors and executives about their duties to report their securities holdings, their spouses' and minor children's holdings to the Securities and Exchange Commission ("SEC") in accordance with Section 59 and the penalties under Section 275 of the Securities and Exchange Act B.E. 2535 (including amendments), including reporting the acquisition or disposal of their own securities, their spouses' and minor children's holdings to the SEC in accordance with Section 246 and the penalties under Section 298 of the Securities and Exchange Act B.E. 2535 (including amendments).
2. The directors and executives of the Company, including their spouses and minor children, are required to prepare and disclose a report on their securities holdings and a report on changes in their securities holdings of the Company to the SEC Office in accordance with Section 59 of the Securities and Exchange Act B.E. 2535 (including any amendments) and submit a copy of this report to the Company on the same day that the report is submitted to the SEC Office.
3. The directors, executives, employees and staff of the Company and its subsidiaries who have received material inside information that affects or may affect the change of securities prices must refrain from trading the Company's securities for a period of 1 month before the financial statements or such inside information are disclosed to the public and for a period of 24 hours after such information of the Company is disclosed to the public. Persons related to such information must not disclose such information to others until such information has been notified to the Stock Exchange of Thailand. In the event of any action that violates the above-mentioned regulations, the Company will consider it a disciplinary offense under the Company's work regulations, and will consider appropriate punishment, ranging from verbal warning, written warning, reprimand, to termination of employment.

### Inside Information Protection

1. Directors, executives and employees of the Company who know or possess inside information of the Company must protect such inside information with care and safety to prevent the leakage of inside information outside.
2. Directors, executives and employees of the Company must not disclose inside information of the Company or its subsidiaries to other persons who are not responsible for such inside information to prevent the use of inside information for their own benefit or that of others.
3. The Company must have a system for the protection and prevention of the use of inside information that ensures that inside information will not be leaked and will not be used to buy or sell securities for themselves or others.
4. The Company will arrange for a confidentiality agreement with an advisor or other service provider before allowing such persons access to transactions related to inside information.
5. Set measures to protect the security of computer systems and information as follows:
  - 5.1 Limit access to information that is not disclosed to the public, allowing it to be known only to executives at specified levels and disclosing it to the Company's employees only as necessary and informing employees that it is confidential information and has limited use.
  - 5.2 Set up a security system in the workplace to prevent access to, use of confidential files and documents.
  - 5.3 Owners of information that is not disclosed to the public must strictly instruct those involved to comply with security procedures.

### Penalties

1. If there is any violation of this policy, the Company will consider it a disciplinary offense under the Company's work regulations, and will consider appropriate punishment, ranging from verbal warnings, written warnings, reprimands, to termination of employment.
2. Persons who fail to comply with the duty to report changes in securities holdings under Section 59 of the Securities and Exchange Act B.E. 2535 (including amendments) to the Securities and Exchange Commission will be subject to penalties under Section 275 of the Securities and Exchange Act B.E. 2535 (including amendments).

Approved by the Board of Directors Meeting No. 3/2024

On February 27, 2024