



CODE OF CONDUCT FOR INVESTOR RELATIONS

Neo Corporate Public Company Limited

Code of Conduct for Investor Relations

Neo Corporate Public Company Limited (“**Company**”) places importance on the performance of investor relations duties. That is because investor relations are responsible for communicating and disclosing various information and activities of the Company to shareholders, investors, analysts, journalists, relevant government agencies, as well as the general public. Therefore, the Board of Directors has established this Code of Conduct for Investor Relations to serve as a guide of practice for operations and to help promote to ensure that the Company’s investor relations operations are based on ethics and in accordance with the corporate governance, with an emphasis being placed on disclosure of information and strict compliance with applicable laws and regulations, taking into account the interests of shareholders and all stakeholders.

In addition to the Corporate Governance Policy and the Code of Conduct and Business Ethics of the Company, investor relations officers, directors, executives, and all employees involved in the Company’s investor relations work must strictly abide by the Code of Conduct for Investor Relations which is consisted of the following principles of practice:

1) Accurate, adequate and timely disclosure of important information that is necessary for investment decisions

- Important information that is necessary for investment decisions must be accurately, clearly, and adequately disclosed in a timely manner to various events that occur. The disclosure must be carried out with utmost care to avoid misunderstanding or misinterpretation. The requirements of government agencies, such as the Office of the Securities and Exchange Commission and the Stock Exchange of Thailand, must be complied with. Investor relations officers may refuse to disclose information that is a trade secret or confidential information, which such disclosure may put the Company at a disadvantage or cause the Company to lose its competitiveness.
- In the event that rumors or news that have not yet been disclosed to the public are revealed, the investor relations officers should promptly clarify the facts to the public in accordance with the requirements of the Stock Exchange of Thailand regarding the disclosure of information of listed companies.
- Disclosure of inaccurate information with an intention to push for a purchase of the Company’s shares is prohibited.
- Channels for disclosing information or sources of information must be provided equally to information users.

2) Maintenance of the Company’s inside information

- Laws, rules, and the Company’s inside information policy must be strictly complied with. As example, they must refrain from trading securities of the Company during the period of 30 days before the disclosure of financial statements or inside information to the public and during the period of 24 hours after such information of the Company and/or its subsidiary company has been disclosed to the public (Blackout Periods), and such information must not be disclosed to others until it is notified to the Stock Exchange of Thailand.
- Meetings must not be held and information must not be explained to investors and analysts within the period of 30 days before the date of disclosure of the Company’s quarterly/annual financial statements (Silent Period).

3) Equal and fair disclosure of information

- Stakeholders must be provided with equal opportunities to access information, but the relevant activities may be organized in different forms as appropriate. The information must be provided on an equal basis without causing any party to be at a disadvantage or lose investment opportunities.
- The information presented in specific group meetings, such as analyst or fund meetings, is required to be published through the Company's website after each meeting to provide information to the public on an equal basis.
- Caution should be used when communicating information via social networks. If it is found that an issue causes a misunderstanding, clarification would be necessary. Information must be clarified through the Stock Exchange of Thailand's system so that investors and the public are widely informed. That is also to prevent problems of the information being provided only to specific groups.
- Channels that allow all relevant groups of people to access and inquire about information must be provided. Inquiries may be made via email at ir@neo-corporate.com or telephone 02-017-8900.

4) Performance of duties with honesty and integrity

- Investor relations duties must be performed to the best of one's ability and knowledge with responsibility and professionalism as well as professional honesty and integrity. The principles of correctness and equality must be upheld without discrimination and preferential treatment for personal benefit or for any specific person or group of persons. As example, ones must not choose to carry out or participate in activities with an external party which provides certain benefits, must not use the Company's properties or information to seek personal benefits, and must not seek personal benefits from the relationships or information obtained from performing investor relations duties for the Company.
- Laws, notifications/announcements, regulations, and guidelines of relevant regulatory bodies, such as the Office of Securities and Exchange Commission and the Stock Exchange of Thailand, including the articles of association and the policies of the group company, such as the Code of Conduct and Business Ethics, the Code of Conduct for Investor Relations, etc., must be strictly complied with.

This Code of Conduct for Investor Relations is effective from 14 November 2023 onwards.

(Mr. Virapan Pulges)

Chairman of the Board of Directors
Neo Corporate Public Company Limited