



INSIDE INFORMATION POLICY

Neo Corporate Public Company Limited

Inside Information Policy

Neo Corporate Public Company Limited (“**Company**”) places importance on the prevention of the use of the Company’s inside information. The Company’s policy is that directors, executives, staffs, and employees of the Company and its subsidiary company are prohibited from disclosing the information which is not yet disclosed to the public and is material to the change of price or the value of securities of the Company (“**Inside Information**”), to any persons, or exploiting Inside Information for themselves or others, whether directly or indirectly, and whether any compensation is received or not. They must also refrain from trading securities or being bound by futures contracts related to the Company’s securities by using Inside Information. In this regard, the Company has established the guidelines for preventing the use of Inside Information as follows:

1. The Company will arrange an internal control system to prevent leakage of Inside Information by prescribing written measures and processes for management of such information for implementation by all directors, executives and employees. Such measures and processes must be reviewed on a regular basis to ensure their appropriateness.
2. The Company will limit the number of persons who have access to the Inside Information to the minimum number and on a need-to-know basis. The Company will ensure that directors, executives, staffs, and employees of the Company and its subsidiary company whose position or responsible work involves Inside Information realize their confidentiality duties.
3. The Company will designate a responsible person to act as center in disclosing the Company’s information to the public. The Company will assign the Internal Audit Department to monitor the implementation of such measures and processes and report to the Board of Directors on a quarterly basis.
4. The Company will have in place the confidentiality agreements with its advisors or other service providers before allowing such persons to access transactions involving Inside Information. In this regard, in the selection of advisors or other service providers, the Company will also consider to be assured that such advisors or other service providers have adequate and efficient internal control systems or are able to prevent leakage of Inside Information received from the Company and its subsidiary company.
5. The Company will provide knowledge to its directors and executives on the duty to report the change in their securities holding and futures contracts, the same of their spouse or cohabiting couple and underage children, to the Office of Securities and Exchange Commission (“**SEC Office**”) in accordance with Section 59 and the provision setting out penalties in Section 275 of the Securities and Exchange Act, B.E. 2535 (as amended) (“**SEC Act**”), as well as reporting the acquisition or disposal of securities by themselves, their spouse or cohabiting couple and underage children, to the SEC Office in accordance with Section 246 and the provision setting out penalties in Section 298 of the SEC Act.
6. The Company requires its directors and executives, including their spouse or cohabiting couple and underage children, to prepare and disclose the reports on the changes in their holding of the Company’s securities to the SEC Office in accordance with Section 59 of the SEC Act and applicable notifications, as well as delivering copies of such reports to the Company’s secretary and the SEC Office. In this regard, the directors and the executives must prepare the report on the change of securities

holding within seven business days from the date on which such securities are purchased, sold, transferred or accepted the transfer in the event that the director or executive's name has not yet shown on the SEC Office's database of directors and executives, or within three business days in the event that the director or executive's name is shown on the SEC Office's database of directors and executives, or such other period prescribed by the SEC Office.

7. Directors, executives, and employees of the Company have the duty to maintain the Inside Information of the Company and its subsidiary company and use the Inside Information only for the benefit of the business operation of the Company and its subsidiary company. They are prohibited from using the Inside Information relating to the Company and its subsidiary company to trade securities or enter into futures contracts related to securities, whether for their own benefit or for the benefit of others. They are also prohibited from disclosing the Inside Information relating to the Company and its subsidiary company to others, whether directly or indirectly, by whichever methods, where they know or should know that the recipient of information may use such information for the benefit of securities trading or entering into futures contracts related to securities, whether for the benefit of the information recipient or others, and whether compensation is received or not.
8. The Company requires directors, executives, staffs, and employees of the Company and its subsidiary companies who know the Inside Information to refrain from trading the Company's securities during 30 days before the financial statements or such Inside Information is disclosed to the public and during 24 hours after such information of the Company and/or its subsidiary company is disclosed to the public. Persons involving such information must not disclose such information to others until such information is notified to the Stock Exchange of Thailand. In this regard, a violation of such regulation would be considered by the Company as disciplinary offense under the Company's work rules and the Company will consider the punishment as appropriate to the circumstance, with the penalties ranging from oral warning, warning in writing, outing on probation, to termination of employment.

This Inside Information Policy is effective from 31 August 2023 onwards.

(Mr. Virapan Pulges)

Chairman of the Board of Directors
Neo Corporate Public Company Limited