Use of Internal Information Policy

Siamese Asset Public Company Limited ("**company**") recognizes the importance of use of internal company information to prevent exploitation of internal company information not yet disclosed to the public and which have future effects on changes in the value of company stocks which are traded in the Stock Exchange of Thailand. Thus, the company has a policy and procedures on handling use of internal information by company directors, executives and employees according to the following details:

- 1. Company directors, executives and employees as well as those of subsidiaries are required to maintain the confidentiality of internal information under their responsibility that belong to the company and subsidiaries to prevent it from falling into the hands of external parties and unrelated company personnel.
- 2. The company must protect use of internal information by restricting access to information not yet disclosed to the public to ensure that such is accessed only as necessary and by persons involved with it, and persons responsible for internal information must remind persons involved for strict compliance.
- 3. Directors, executives and employees of the company and subsidiaries must not disclose secrets and/or internal information of the company and subsidiaries, nor exploit it for their own gain or for the benefit of other persons, whether directly or indirectly and regardless of whether or not it is in exchange for remunerations.
- 4. The company has assigned persons or agencies to be responsible for disclosing company information to the public to ensure that information is correct, complete and is disclosed in accordance with the law.
- 5. The company must supervise and oversee persons involved with internal information such as financial advisors, legal advisors and auditors, including persons with work responsibilities involved with information not yet disclosed to the public, that is under negotiation or that fits the criteria for protection of internal information, that might influence changes in the price or value of stocks or that cause the company to lose interest. Accordingly, said persons are required to maintain the confidentiality of contracts until information is disclosed to the Stock Exchange of Thailand and the Securities and Exchange Commission.
- 6. Directors, executives and employees of the company and subsidiaries are responsible for protecting internal information belonging to the company and subsidiaries and are to not exploit internal information even after they no longer hold their statuses or have finished working at the company.
- 7. Directors and executives have the duty of reporting their stock holding and reporting their stock holding changes in accordance with Section 59 of the Securities and Exchange Act, B.E. 2535 (1992) within 3 business days after the date of purchase, sale, transfer or receipt of transfer of stocks or futures contracts by reporting through the electronic system via www.sec.or.th to the Securities and Exchange Commission, and they are prohibited from trading company stocks in the 1 month period before financial statements are disclosed to the public. These requirements also extend to the spouses and persons living as spouses and the children who are not of majority age of directors and executives and the juristic persons in which directors and executives or spouses or persons living as spouses or

children not of majority age of directors and executives hold shares together in excess of 30% of all company voting rights.

- 8. The directors, executives and employees of the company and subsidiaries are prohibited from trading or receiving transfers of company stocks by using secrets and/or internal information of the company and subsidiaries and/or conduct other juristic acts by using the secrets and/or internal information of the company and subsidiaries in a manner that takes advantage of outside parties. These requirements extend to the spouses and children who are not of majority age of the directors, executives and employees of the company and subsidiaries, and persons who violate these regulations will be deemed to have committed a serious violation, against which the company and/or subsidiary will take legal actions.
- 9. The company requires directors and executives who come into knowledge about significant information that can influence changes in the price or value of stocks to refrain from trading company stocks in the 1-month period before the financial statements or internal information in question is disclosed to the public. Additionally, said significant information is prohibited from being disclosed to other parties in the 30-day period before announcement of performance results, and the company's secretary will prepare letters to notify directors, executives and agencies that have come into knowledge of said internal information to not disclose the internal information to outside parties or parties without duties related to it and to wait at least 24 hours after the public disclosure of said information and, in cases where the disclosure of said information is not widespread or is highly complex, to wait for 48 hours after the public disclosure of said information before trading in company shares, and the aforementioned persons and persons involved with the internal information are prohibited from disclosing said information to other parties.
- 10. The company is required to educate directors and executives about their duties to prepare and disclose reports of their holding of company stocks as well as those of their spouses and children who are not of majority age to the Office pursuant to Section 59 and penalties under the Securities and Exchange Act, B.E. 2535 (1992) (including amendments).

Accordingly, the company deems actions in violation of the internal use of information policy and unauthorized information disclosures that cause damage to the company, subsidiaries and connected persons to be wrongdoing requiring disciplinary penalties and/or legal punishment, which penalties will be judged based on the intent of such actions and the severity of the wrongdoing that occurred.