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Insider Information Policy and Blackout Periods for Securities Trading of HaadThip Public Company Limited

In operations of HaadThip Public Company Limited, Directors, Management, Employees and Related persons will consider and acknowledge non-disclosed information to shareholders, investors and public that might impact price of securities. The use of insider information is important and needs appropriate management to protect the leakage of information, inappropriate use or taking advantage of others which are illegal and impact to the Company's reputations.

The Company's Insider Information Management

Definition

1. "Insider information" is the information which has not yet been disclosed to public and its material content could influence changes in securities prices or values of HaadThip Public Company Limited' Securities.

Enforcement

This policy enforced:

- 1) Directors of HaadThip Public Company Limited and its subsidiaries.
- 2) Executive and Employee of HaadThip Public Company Limited and its subsidiaries who acknowledge insider information.
- 3) Person who acts as representative or outside person who works with and acknowledges insider information of HaadThip Public Company Limited and its subsidiaries.

Regulations

- 1) No indirect and direct disclosure to others in any means, with and without acknowledgement that others will use information to trade securities or future contract for themselves or others.
- 2) Company's insider information is kept with care and safety to protect the leakage of insider information to third parties.
- 3) No disclosure of insider information to anyone who is not related to operations for the protection of the use of insider information for anyone's benefit which might impact the prices and values of securities of the company or other listed companies that are related to such insider information or might result in investment decision.

- 4) No trading of securities related to insider information which he/she acknowledges, processes and connects, and take advantage of others who trade securities and do not acknowledge insider information.

HaadThip Public Company Limited' Securities Trading Blackout Periods

Definition

1. "Insider information" is the information which has not yet been disclosed to publics and its material content could influence changes in securities prices or values of HaadThip Public Company Limited' Securities.
2. "Company Secretary" is a person that HaadThip Public Company Limited reported his/her name to the Office of the Securities and Exchange Commission to be Company Secretary in accordance with the Securities and Exchange Act B.E. 2535 (as amendments).

Enforcement

This policy enforced:

- 1) Directors of HaadThip Public Company Limited and its subsidiaries.
- 2) Executive and Related Employee (level 5 and above in accordance with HaadThip Public Company Limited' structure).
- 3) Employee in accounting, finance, and legal departments or any other function who acknowledges insider information before releasing to public.
- 4) Spouse, cohabiting couple and dependent under the age of 20 years of persons in No.(1) - No.(3).

Regulations

1. Company Secretary is to set 30 days before and 24 hours after the disclosure of disclosure of any quarter and annual financial statements and any period by an announcement of HaadThip Public Company Limited and announces in advance.
2. During each blackout period, Directors, Executive, Related Employees including their spouse, cohabiting couple and dependent under the age of 20 years (in accordance with enforced persons No.(1) – No. (4)) are prohibited from the trading and any action that impact HaadThip Public Company Limited' Securities.