



บริษัท ร่มโพธิ์ พร็อพเพอร์ตี้ จำกัด (มหาชน)

**RHOM BHO PROPERTY PUBLIC COMPANY LIMITED**

53 ถนนสุขุมวิท แขวงลาดพร้าว เขตลาดพร้าว กรุงเทพฯ 10230 โทร: 02-907-8443-4 แฟกซ์: 02-907-8144

## Prevent Internal Information Policy

To ensure fair and equitable treatment of all stakeholders and having recognized the importance of prevention of insider information abuse, the company has set the policy and measures to prevent directors, executives, and employees from using non-public insider information for personal gain, including insider trading, as follows:

1. The company has set guidelines for safeguarding information and preventing the misuse of insider information in writing to ensure fair treatment of all shareholders, customers, partners, and stakeholders in accordance with the law and principles of good corporate governance.
2. The company prohibits its directors, executives, and employees from using non-public information material to the company's securities trading and could affect the price of the company's securities for personal benefit or the benefit of others, whether directly or indirectly and whether the benefit is received.
3. Directors, executives, staff members, and employees obtaining non-public material insider information which could affect securities prices by virtue of their positions are prohibited from buying or selling, or offering to buy or sell, or inducing others to buy or sell shares or other securities (if any) of the company, whether directly or indirectly, in a way that may cause direct or indirect damages to the company, whether such action is to seek personal gain or for the benefit of others, or disclosing this information with the intention to allow others to conduct such action, whether or not the benefit is received in return. This regulation shall also apply to the spouses and minor children of the company's directors, executives, staff members, and employees.
4. The company prohibits directors, executives, employees at the management-level or higher in accounting or finance, and staff members working with material insider information that could affect securities prices from buying and/or selling the company's securities within the period of one (1) month prior to disclosure of the company's financial statements or operating results and financial status or material information that could affect securities prices and within at least twenty four (24) hours after disclosing such information to the public. In case that the information disclosed is not well-disseminated or is very complex, they shall wait for 48 hours after disclosing such information to the public before buying or selling the company's securities. These individuals and individuals related to insider information are also prohibited from disclosing such information to other parties.
5. The company requires directors, executives, and employees at the management-level or higher in accounting or finance to submit report of their and their spouses and minor children's holdings of the company's securities to the Company Secretary within thirty (30) days after assuming the position.



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Furthermore, directors and executives must notify the Board of Directors or individual designated by the Board of Directors of any purchase or sale of the company's securities at least one (1) day in advance of the purchase or sale to be reported to the Securities and Exchange Commission within three (3) days of the date of purchase, sale, transfer, or taking a transfer of such securities as required by the Securities and Exchange Act.

6. The company requires directors and executives to prepare and submit a report of interests to the Company Secretary in accordance with the rules set forth in the Securities and Exchange Act.
7. The company requires directors and executives to report changes in their holdings of securities and submit a report of interests to the Company Secretary who will submit the report to the Board of Directors at the next Board's meeting and disclose changes in directors and executives' holdings of securities in the annual report.
8. The company places importance on preventing the misuse of insider information to gain personal benefits or cause the company's benefits to decrease or cause conflicts of interests as specified in the Corporate Governance Policy, Code of Ethics, Code of Best Practice, employment contracts, and workplace regulations.
9. The company places importance on confidential information of customers and shall not use such information for the interest of directors, executives, staff members, and other related persons, unless the information is required to be disclosed by laws.
10. The company places importance on information security by controlling and/or preventing access to information of external parties and determine the right to access to information of employees at different levels according to their duties and responsibilities.
11. In case that external parties are involved in ad hoc tasks related to non-public and negotiating information deemed to be within the scope of insider information that could affect the price of the company's securities, such external parties must sign a confidentiality agreement to keep the information secret until it is disclosed to the Stock Exchange of Thailand and Securities and Exchange Commission.

Directors, executives, employees violating the Insider Information Policy shall be subject to disciplinary and/or legal actions, whichever the case may be.