



# **Central Plaza Hotel Public Company Limited**

## **Policy to Prevent Misuse of Insider Information**

**(2026 Edition)**

Approved by the Board of Directors Meeting No. 7/2025

on 14 November 2025

**PUBLIC**

Prepared by Company Secretary Department

## **Policy to Prevent Misuse of Insider Information**

Refer to the “Policy to Prevent Misuse of Insider Information” announced on 1 December 2022. Central Plaza Hotel Public Company Limited (“the Company”) realizes the importance of preventive measures against misuse and abuse of inside information by directors, executives, employees and related parties, directly or indirectly for their own or others’ benefits. Whether returns are obtained or not, such an act violates the Securities and Exchange Act, puts pressure on the Company’s interests, causes conflict of interest and is harmful to the Company’s credibility. To conform with laws on securities and exchange; the guidelines of the Securities and Exchange Commission and the Stock Exchange of Thailand regarding listed companies’ disclosure and safeguarding of information that influences share prices as well as the handling of such information; and the Board of Directors meeting No. 6/2024 held on 14 November 2024, reviewed this policy as the following details.

### 1. Definition

“the Company”	means Central Plaza Hotel Public Company Limited
“Directors”	refer to the directors according to the regulations on the Board of Directors.
“Executives”	means a manager or the first 4 executive positions after the manager and all persons with equivalent positions to the 4th including positions in accounting or finance at the level of department manager or equivalent.
“Employees”	refer to the employees according to the regulations on personnel management.
“Inside information”	means the information that has not yet been disclosed to the general public and may influence the price of securities. It concerns financial results, earnings forecasts, dividends, issuance of new securities, borrowings, significant changes, liquidity problems, acquisitions, investment, mergers, significant lawsuits, the Board of Directors’ resolutions, etc.

“Confidential information”	means the information not available to the public and, if made public of in the hands of competitors, may cause serious harms on the operations or affect the Company’s competitiveness.
“Impact on securities prices”	means the impact that may raise, lower, maintain or support the securities prices.

2. Directors, executives and those holding the positions of vice president or higher in the accounting and finance functions are educated on the duty to report their own shareholding, including that of spouse, cohabiting couple and children under legal age, according to the Section 59 and the Section 275 of the Securities and Exchange Act B.E. 2535 (1992) (as amended), as well as the acquisition or disposal of shares held by themselves, spouse, cohabiting couple and children under legal age according to the Section 246 and the Section 298 of the Securities and Exchange Act B.E. 2535 (1992) (as amended) to the Securities and Exchange Commission, Thailand (“SEC”).
3. Report on Securities Holdings of Directors and Senior Executives
  - Directors and senior executives are responsible for reporting changes in the holding of the Company’s securities that holding by directors and senior executives when on board, as well as their spouses or cohabiting couple and children not yet of age, to the Securities and Exchange Commission with three (3) business days according to section 59, Securities and Exchange Act, fifth amendment, B.E. 2559 (2016) and other revised in additional.
  - Directors and senior executives who are responsible for reporting the holding of the Company’s securities to the Securities and Exchange Commission, they must inform the Board or company secretary or their delegate at least one (1) day before transaction is made.
  - The Company Secretary is responsible for compiling the information of securities holding of the directors and senior executives, including their spouses or cohabiting couple and children not yet of age and report to the Board meeting in every quarter and disclose in annual report.

4. The Company is dutifully bound to disclose the information of significant operations including financial and non-financial information instantly and thoroughly to the public, shall not discriminate against both positive and negative information. However, the disclosure of information of the Company shall be accordance with the rules and regulations of the Stock Exchange of Thailand, to reach all groups of investors in an accurate, timely and equal manner.
5. Directors, executives, employees of the Company and its subsidiaries must not release the internal information or confidential information of the Company or its counterparties, which is obtained from the performance of duties to other persons, to prevent impacts or damage to the Company.
6. Directors, executives, and employees who know or possess the Company's inside information are prohibited from disclosing or passing the information, directly or indirectly and through any means, to outsiders or irrelevant persons including family members, friends, relatives, knowing or supposed to know that the recipients may use that information in buying, selling, or entering futures contracts related to the Company's securities, whether for themselves or other persons.
7. The Company's inside and confidential information can be made known or shared with individuals within the Company as necessary or as relevant to their work.
8. Directors, executives, those holding the positions of vice president or higher in the accounting and finance functions and relevant operators including their spouses and minor children or other persons knowing of the Company's significant inside information that may influence securities prices are prohibited from selling, buying, or advising others to sell or buy the Company's securities during the 30-day period before the public disclosure of financial statements or such inside information. Share trading is also prohibited within the 24-hour period after the disclosure or during any blackout period. The persons, who involve with such information, must not release it to others until it is reported to the Stock Exchange of Thailand.

9. Executives and individuals in the Investors Relations Department are prohibited from accepting appointments or answering questions about future results to investors and analysts at least 10 days prior to the disclosure of financial results.
10. The Company will educate directors, executives and employees on relevant laws and regulations for their strict compliance.
11. In the event that a third party engages in special activities that have not been made public or are under negotiation process, they will be bound to safeguard the inside information that may influence the Company's securities prices. They must enter into confidential agreements which are enforced until such information is made public.
12. The Company deems that the wrongful use of the inside information of the Company is a disciplinary offense in accordance with the Company's work regulations. Disciplinary action will be taken as appropriate for the case from verbal or written admonition, probation, no annual wage increase, no bonus payment as well as dismissal. The offenders and related persons may also be subjected to criminal and civil liabilities.
13. The significant materials of the Policy to Prevent Misuse of Insider Information will be revealed in the Company's Annual Report and the Company's website, for the acknowledgement of the Company's directors, executives, employees and stakeholders.

This Policy to Prevent Misuse of Insider Information (2026 Edition) was approved by Board of Directors Meeting 7/2025 on 14 November 2025 and will be effective from 1 January 2026 onwards.

- Signed -

Mr. Norachit Sinhaseni

Chairman of the Board

Central Plaza Hotel Public Company Limited