



Central Plaza Hotel Public Company Limited

Policy to Prevent Misuse of Insider Information

2022

Policy to Prevent Misuse of Insider Information

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’ resolution at the meeting No. 4/2022 held on 10 November 2022, define the guidelines for preventing the misuse of insider information of Central Plaza Hotel Public Company Limited are summarized below.

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 or 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. Directors, executives and those holding the positions of vice president or higher in the accounting and finance functions are required to report their holdings of the Company's securities as well as the holdings of their spouses, children, under legal age and must inform the to the Board of Directors, the Company Secretary or the person who assigned by the Board of Directors at least 1 day prior to the buy, sell of the Company’s securities and also must prepare and disclose their holding of the Company’s share and any change in the status of such shareholding to the SEC as specified in the Section 59 of the Securities and Exchange Act B.E. 2535 (1992) (as amended) within 3 working days after the Company’s shares are purchased, sold or transferred and submit a copy of such shareholding report to the Board of Directors of the Company within the same date
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.

The Policy to Prevent Misuse of Insider Information is effective from 1 December 2022 onwards

-Signed-

(Mr. Suthikiati Chirathivat)

Chairman

Central Plaza Hotel Public Company Limited