

**- Translation -**

**Beryl 8 Plus Public Company Limited  
Inside Information Policy**

**(As approved by the Board of Directors' Meeting No. 1/2021 held on June 9, 2021)**

Beryl 8 Plus Public Company Limited (the “**Company**”) places importance on equality and fairness to relevant stakeholders including all shareholders and investors equally. The Company considers that inside information, or news impacts the change of securities price which haven't been disclosed to the public, are inside information used in the business operations and are confidential information. Therefore, the directors, executives and all level employees of the Company have to keep inside information as secret and are strictly prohibited to disclose the secret and/or inside information that has not been publicized for the purpose of gaining interest, either directly or indirectly, even not for the purpose of gaining any interest at all.

Therefore, the company has set guidelines for inside information protection as follows;

**1. Buying or selling company's securities by using inside information.**

- 1.1 The company will educate its directors and executives about the duties to report securities holding of their own, including spouse or conjugal partner, and children under legal age, including the juristic persons that directors, executives, spouse or conjugal partner and children under legal age hold more than 30% of the votable shares to the Securities and Exchange Commission Thailand (“**SEC**”) according to article 59 (Company Securities) and the imposition according to article 275 of the Securities and Exchange Act B.E.2535 (and amendment) (“**Securities and Exchange Act**”) And report the acquisition or selling of the company's securities to the SEC according to the article 246 and imposition according to article 298 of Securities and Exchange Act.
- 1.2 Directors and executives of the company must prepare and submit their report of the securities holdings of themselves and spouse or conjugal partner, children under legal age including juristic persons that directors, executives, spouse or conjugal partner and children under legal age hold more than 30% of the votable shares according to article 59 of the Securities and Exchange Act to the company secretary in the designated format every time before submitting to the Securities and Exchange Commission Thailand. The report should be prepared and submitted within 30 days after the directorship and/or executive appointment and when changes occur, or report their change of holding of specified securities within the period specified by the law. The company secretary must summarize the securities holding and changes of holding information at the board meeting for their acknowledgement every six months.

- 1.3 Directors and executives including Division Managers or equivalent positions in the Accounting and Finance Department and related parties and, according to the Securities and Exchange Act, the persons assumably knowing or holding the inside information which is critical and impacts the change of price or value of the company securities must refrain from buying or selling, or making an offer to buy or sell, or convincing others to buy or sell or make an offer to buy or sell the company's securities directly or indirectly before the financial statement or financial and company status or any critical inside information (depending on circumstances) has been publicly disclosed. The embargo period will be counted from one month before the disclosure date until the disclosure date of the quarterly or annually financial performance. The company will inform the board and executives to refrain from buying or selling the company's securities in writing at least one month prior to the disclosure date (only in case of quarterly and annual financial performance statements) and until after a period of 24 hours following the public disclosure. They are also forbidden from disclosing such critical information to others.
- 1.4 Employees at all levels and related persons are prohibited from using inside information for their own trading benefit, or soliciting other people to trade or offer to purchase or sell the Company's securities, whether by themselves or through a broker, while still in possession of the Company's information that has not been publicly disclosed to others for the benefits of trading in the Company's securities.

## **2. Confidentiality**

- 2.1 Directors, executives and employees at all levels must maintain confidentiality of information and documents that cannot be disclosed and/or is a trade secret, invention formulas, intellectual property of the Company to outsiders, especially competitors even two (2) years after retirement. Such period of time does not include the cases of confidential information that must be in compliance with the terms and conditions of the Non-Disclosure Agreement which requires the persons having duties under the said agreement to comply.
- 2.2 Shall not use the opportunities or information obtained from being a director, an executive or an employee for personal benefit and in conducting a competing business or that related to the Company's core business.
- 2.3 The use of the Company's inside information must be within the framework of duties and responsibilities as assigned only.

## **3. Maintaining personal information**

Directors, executives and employees at all levels must comply with the laws, policies, regulations, requirements or guidelines of the Company and the organizations related to personal data protection, collecting, using and disclosing personal data in the Company's

custody, as well as keeping personal information safe and secure. In addition, the Company has put the process of deleting or destroying unnecessary data with appropriate methods in place to prevent adverse impacts on the Company, directors, executives, employees and related stakeholders.

Failure to comply with the aforementioned regulations shall be considered as disciplinary offense in accordance with the Company's regulations and subject to penalties as appropriate, ranging from oral warning, written warning, probation, to employment termination.

The Inside Information Policy shall be effective from June 9, 2021.

(Mr. Chatchaval Jiaravanon)  
Chairman of the Board of Directors  
June 9, 2021