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Inside Information Exploitation Prevention Policy of Thai Credit
Bank Public Company Limited for the Year 2024

1. Principles and Rationale

Thai Credit Retail Bank Public Company Limited ("the Bank") is committed to conducting its business in compliance with the law and adhering to principles of good corporate governance, particularly with respect to the management of the Bank's internal information. This is especially important in the Bank's operations, where directors, executives, or employees may have access to internal information that could affect the price of securities or influence investment decisions regarding the Bank's securities, and such information cannot be publicly disclosed.

Therefore, the use of internal information must be managed appropriately to prevent its improper disclosure or misuse. Misuse of such information not only constitutes a legal violation but can also damage the reputation of the Bank. As such, the Bank has established this policy to prevent the improper use of internal information.

2. Objectives

This is to establish a clear understanding, facilitate communication, and provide a set of guidelines for the Bank's personnel regarding the prevention of insider trading.

3. Definitions

Material Information means:	<p>(1) Information that has not been disclosed to the public and is of significant importance in influencing the price or value of securities.</p> <p>(2) Information that is prohibited from being disclosed to the public.</p> <p>(3) Information that is prepared for public disclosure but has not yet been officially released.</p> <p>(4) Any information that could affect the operations of the Bank and its subsidiaries in a manner that may cause harm or disadvantage to the Bank and its subsidiaries, including but not limited to financial performance, commercial data, or other information related to the Bank and its subsidiaries that has not been publicly disclosed.</p>
Inside Information means	information that has not been publicly disclosed and is of significant importance in influencing the price or value of securities.
Office means	the Securities and Exchange Commission (SEC) Office.

Stock Exchange means	the Stock Exchange of Thailand.
Form 59	the report form required under Section 59 of the Securities and Exchange Act B.E. 2535 (1992) for reporting changes in the holdings of securities and futures contracts.
Executive means	the manager or the first four top-ranking executives after the manager level as well as all other 4th ranking equivalent, and accounting or finance executives of department head level and up.

4. Scope

This policy applies to the Board of Directors, executives, auditors, and employees at all levels of the Bank and its subsidiaries, as well as any other individuals who have access to inside information of the Bank and its subsidiaries, in accordance with the announcement from the Office.

5. Guidelines

5.1 Inside information retention

All personnel at the Bank are required to strictly adhere to the Bank's code of conduct and ethics. They must also be fully aware of the procedures for safeguarding confidential information to protect it from unauthorized disclosure and to prevent the misuse of inside information. The Bank has implemented a classification system for the confidentiality of information, designating significant inside information, as outlined in this policy, as confidential. This information must not be disclosed to external parties. Inside information may be classified into several levels of confidentiality, such as publicly available information, internal-use-only information, confidential information, and highly confidential information. The use of inside information must be limited to the duties and responsibilities assigned to each individual. Any disclosure of information to external parties or the public must receive approval from the Chief Executive Officer (CEO). The CEO may personally respond in cases of significant importance or may delegate the responsibility to an appropriate individual in charge of public disclosures. The Bank will designate personnel responsible for disseminating information to the public, including investor relations and communication with relevant investment agencies, and will coordinate with internal departments that own the information. Bank personnel must not provide comments or respond to inquiries from external parties unless explicitly assigned to do so. If they are not assigned, they should politely decline to make any statements. Unauthorized disclosure of material, non-public information is strictly prohibited.

5.2 Use of Inside Information

The Bank recognizes its responsibility to its shareholders and stakeholders to operate in accordance with principles of good corporate governance. To enhance confidence among shareholders, investors, and all involved parties, the Bank has established measures to ensure fairness and equity in the use of inside

information. These measures are intended to protect the interests of shareholders, investors, and stakeholders. The Bank prohibits all personnel, as previously mentioned, and their family members who have access to inside information from using such information to buy or sell securities or enter into futures contracts related to securities, whether for their own benefit or that of third parties, except as explicitly permitted by the Securities and Exchange Commission (SEC). The Bank also prohibits the direct or indirect disclosure of inside information to others if there is knowledge, or should be reasonable knowledge, that the recipient may use the information to trade securities or enter into related futures contracts, unless the disclosure does not result in an unfair advantage or is conducted in accordance with SEC regulations. Any improper use of inside information for securities trading, whether for speculation or to gain an advantage for a particular group, will be deemed illegal and a violation of both legal and internal disciplinary standards.

5.3 Prohibition on Securities Trading

Directors and executives, including those in positions equivalent to vice president or above in the financial and accounting departments, as well as employees in departments associated with inside information, and their spouses, cohabiting partners, and minor children who have access to material inside information that may affect the price or value of securities, are prohibited from trading the Bank's securities for a period of 30 days prior to the release of the quarterly or annual financial statements, or any disclosure regarding the financial status and position of the Bank, and until 24 hours after the Bank has made such information publicly available (Blackout Period). The Bank will notify its Board of Directors, executives, and personnel holding positions equivalent to Director or above in the financial and accounting departments, as well as its auditors, in writing, at least 30 days prior to public disclosure of such information, instructing them to refrain from trading the Bank's securities. Directors, executives, and employees in the financial and accounting departments at the managerial level or equivalent, who are privy to material inside information, must not trade the Bank's securities until 24 hours after such information has been disclosed publicly. Additionally, they are prohibited from disclosing such material information to any third parties.

5.4 Reporting of Securities Trading (Form 59)

Directors, executives, including those holding accounting or financial positions at the level of manager or equivalent, as well as the Bank's auditors, including those responsible for bankruptcy planning and management under the Bankruptcy Act, are required to prepare, disclose, and submit reports regarding the acquisition and changes in the holdings of securities and futures contracts, including those of their spouses, cohabiting partners, minor children, and any legal entity in which the director, spouse, cohabiting partner, or minor child collectively holds more than 30% of the total voting rights of the entity. These reports must comply with the provisions of the Securities and Exchange Act, regulations from the Securities and Exchange Commission (SEC), and related capital market regulations. The reporting deadlines are as follows:

- (1) Initial Reporting (In cases where securities or futures contracts are held before assuming the position that requires reporting): The individual must not report until a transaction involving the

purchase, sale, transfer, or acquisition of the securities or futures contracts occurs. Once such a transaction takes place, the report must be prepared and disclosed via the SEC's electronic system. The reporting methods and deadlines are as follows:

- Report after each transaction: A report must be submitted within 3 business days from the transaction date.
- Report based on aggregate value or time period: A report is required when one of the following conditions is met, whichever occurs first, and must be submitted within 3 business days of meeting the condition:
 - The total value of transactions reaches or exceeds 3 million Baht.
 - Six months have passed since the first transaction.

(2) Reporting Changes in Holdings

In cases where there is a purchase, sale, transfer, or acquisition of securities, a report on the change in securities and futures holdings must be prepared and disclosed via the SEC's electronic system. The reporting methods and deadlines are as follows:

- Report after each transaction:** A report must be submitted within 3 business days of the transaction.
- Report based on aggregate value or time period:** A report must be submitted if any of the following conditions are met, whichever occurs first, within 3 business days:
 - The total value of transactions reaches or exceeds 3 million Baht.
 - Six months have passed since the first transaction.

The corporate secretary shall also prepare reports on securities trading as outlined in sections 5.4.1 and 5.4.2 and present them to the Bank's Board of Directors for review on a quarterly basis (if applicable).

(3) Exceptions

A report on the change in securities holdings is not required under the following circumstances, as specified in the SEC's announcement:

- 1) Offering shares to existing shareholders in proportion to their holdings (Right Offering).
- 2) Exercising rights under convertible securities.
- 3) Exercising rights under warrants for purchasing shares or convertible bonds issued to directors or employees of the group (Employee Stock Option Plan

“ESOP”) or participation in employee joint investment programs (EJIP) that comply with SEC regulations.

- 4) Acquisition of securities through inheritance.
- 5) Transfer or receipt of securities as collateral for futures contracts.
- 6) Acquisition of securities from dividend stock distributions.
- 7) Changes in securities holdings due to securities lending or borrowing transactions with a licensed securities business operator in the securities lending and borrowing business or a securities depository, in accordance with the SEC's prescribed guidelines.

6. Penalties for use of inside information

An individual who misuses inside information for personal gain will face disciplinary action, starting with a written warning, salary deductions, unpaid suspensions, or even termination of employment. The nature and severity of the violation will determine the specific consequences. Additionally, the individual may be subject to legal penalties under applicable securities and exchange laws, as determined by the relevant authorities.

7. Policy review and revision

To ensure that the policy is properly implemented in line with the prevailing circumstances and the banking transaction environment, The Bank mandates a periodic review of the Inside Information Exploitation Prevention Policy, at least once a year or whenever significant changes impact this policy. The Bank may occasionally adjust or modify the policy, aiming to enforce it appropriately and effectively as The Bank may consider appropriate.