

Inside Trading Policy

i-Tail Corporation Public Company Limited (“**The Company**”) has operated its businesses by taking account of its shareholders, investors, stakeholders, economy and the society. For supervision of the Company’s directors, subcommittee members, executives and employees relating to the use of the Company’s inside information which is not disclosed to the general public for seeking of personal benefits and for compliance with the Securities and Exchange Act B.E. 2535 (including Amendments thereof) (“**Securities and Exchange Act**”) and the Notification of the Board of Governors of the Stock Exchange of Thailand; Subject: Guidelines on Disclosure of Information of Listed Companies, therefore, the Board of Directors has passed its resolution to approve the Inside Information Policy, with the following details:

Guidelines

1. The Company shall give knowledge to directors, subcommittee members and executives, including accounting and finance executives at the level equivalent to or higher than department manager, including the Company’s auditor, relating to duties of reporting holding securities and changes of such holding and derivatives of themselves, spouse, cohabiting couple and minor children of directors, subcommittee members and executives including juristic persons that directors, subcommittee members and executives, spouses or cohabiting couple, and minor children of directors, subcommittee members and such executives holding the total shares of exceeding 30% (thirty percent) of the total voting rights, and mutual shareholding which is equal to the largest proportion in such juristic person to the Office of Securities and Exchange Commission (“**SEC Office**”) as per the criteria prescribed in the Securities and Exchange Act.
2. It is required that directors, subcommittee members and executives, including accounting and finance executives at the level equivalent to or higher than the department manager, shall take action by themselves and shall cause their spouses or cohabiting couple, and their minor children, including juristic persons that directors, subcommittee members and executives, spouses, or those cohabiting couple, and minor children of such directors, subcommittee members and executives, holding the total shares exceeding 30% (thirty percent) of the total number of the voting rights, and such total shareholding shall be the largest proportion thereof in such juristic person, to prepare, to disclose and to submit a report of holding securities and changes of such holding and derivatives to the SEC Office as per the criteria prescribed in the Securities and Exchange Act, and to send a copy of this report to the Company Secretary on the same date of sending such report to the SEC Office ; whereby, such report shall be prepared as per the prescribed Form and shall be submitted to the SEC Office within periods of time, as follows:
 - 2.1 Within 7 working days from the date of buying, selling, transferring or acceptance of transfer of securities or derivatives, in case, the person who is obliged to report is a director or subcommittee member or executive of the Company, and it shall be in accordance with the complete criteria, as follows:
 - (a) The Company shall notify the list of directors or subcommittee members and executives to be included into the data system of the list of directors or subcommittee members and executives of the Company who have issued securities as per the methods prescribed by the Office in the Notification of the Office Governing the Form and Methods of Notification or Change of Information of Directors, Directors and Executives of the Company.

- (b) The person who is obliged to report the buying, selling, transferring or acceptance of transfer of securities or derivatives before the date when names are included in the data system of the list of directors or subcommittee members and executives of the Company (Whitelist) who have issued securities under (a)

- 2.2 Within 3 working days from the date of buying, selling, transferring or acceptance of transfer of securities or derivatives in cases other than those in Sub-clause 2.1
3. It is required that directors or subcommittee members and executives, including accounting and finance executives at the level equivalent to or higher than department manager with duties and responsibilities to prepare and present a report of interest to the Company which shall be kept at the Company Secretary; provided that such person shall be obliged to report additional data to the Company Secretary upon change of data in such report.
 4. The Company has limited the access to the inside information which is not disclosed to the general public and which shall only be recognized by the related directors, subcommittee members, executives and employees of the Company as may be necessary; and such people shall be notified that the information is confidential and having limitations of use.
 5. It is required that directors or subcommittee members and executives, including accounting and finance executives at the level equivalent to or higher than department manager, and employees relating to the inside information and intending to buy and to sell the Company's securities, shall give a prior notice thereof of at least 1 day before the date of buying and selling thereof to the Company Secretary or the person who is assigned by the Board of Directors and shall prepare "Declaration Form for Securities Holding" as announced by the Company and sent to the channel prescribed by the Company.
 6. It is required that directors or subcommittee members and executives, including accounting and finance executives at the level equivalent to or higher than department manager, including spouses or cohabiting couple, and minor children, and employees relating to the inside information on financial statements, financial position or the operating results of the Company, including other significant inside information affecting the change of securities price, shall not buy and sell and shall be prohibited to persuade others to buy and sell securities of the Company directly or indirectly during the period of time before the disclosure of financial statements or information relating to financial position and status of the Company and/or other significant inside information for not less than 1 month in advance before the disclosure of information to the general public, and shall not buy and sell securities of the Company until the lapse of a period of 24 hours after the disclosure of data to the general public, and shall be prohibited to disclose significant information which has not yet been disclosed to the general public and third parties or people who have no related duties.

Whereby, the Company shall give a written notice to directors or subcommittee members and executives, including accounting and finance executives at the level equivalent to or higher than department manager and employees relating to the inside information on financial statements, financial position or the operating results of the Company, including other significant inside information, of period of time relating to prohibition of buying and selling of securities of the Company.

In case, directors, executives and the designated personnel of the Company may have made transactions relating to securities of the Company during the silent period from buying and selling of securities of the Company, and such people are under the situation of necessity such as

encountering the severe financial difficulties or having to comply with legal requirements or being subject to the Court's order, a memorandum thereof shall be provided and specified with reasons thereof to be proposed to the Company for approval.

Provided that the Applicant for Approval shall make transactions of buying and selling of securities of the Company within a period of 3 working days from the date of having receiving a written notice of approval thereof; and the Applicant for Approval shall send a copy of such memorandum of application in writing to the Company Secretary

7. Directors, subcommittee members, executives and related employees and/or designated personnel who are given with opportunities to access or occupy the inside information, shall be prohibited to use the inside information of the Company which has, or may have, impact on the change of prices of securities of the Company, and has not yet been disclosed to the general public but has been acknowledged to those in such positions, and, if disclosed, shall have impact on changes of prices of securities of the Company in the Stock Exchange of Thailand, for buying or selling or offering for buying or offering for selling or persuading others to buy or sell or to offer for buying or selling of shares or other securities (if any) of the Company directly or indirectly, and no matter whether such action is taken for personal benefits or for benefits of others, or disclosure of such matters of facts so that others would take such action for their own benefits or not.
8. Directors, subcommittee members, executives and related employees and/or designated personnel who are given with opportunities to access or occupy the inside information or former directors, former subcommittee members, former executives and former related employees and/or former designated personnel who are given with opportunities to access or occupy the inside information shall be prohibited to disclose the inside information or confidential information of the Company, as well as confidential information of suppliers of the Company that they have received from performance of duties to third parties, though the disclose of such data may not cause damage to the Company and its suppliers.
9. Directors, subcommittee members, executives and employees of the Company or former directors, former subcommittee members, former executives and former employees shall be obliged to keep the confidentiality of secrets and/or the inside information of the Company and shall be obliged to use the inside information of the Company for the purpose of business operation of the Company only. Provided that directors, subcommittee members, executives and employees of the Company shall be prohibited to use confidential information and/or the inside information of the Company for directly or indirectly seeking of their own benefits or for benefits of others and with or without compensations
10. The Company Secretary shall report the status of holding securities and changes of such holding of the Company by directors and executives, including accounting and finance executives, to the Chairman of the Board of Directors and the Chairman of the Audit Committee for acknowledgment on a quarterly basis, and shall present a summary of holding securities and changes of such holding of securities of the Company on a yearly basis to the Board of Directors for acknowledgment in the Board of Directors' Meeting and in the Annual Report of the Company.
11. The Company shall organize training on the use of the inside information on a yearly basis for directors, subcommittee members and executives of the Company as well as those who may access the data which is not disclosed to the general public, for review of understanding and awareness of importance thereof and for strict compliance with the rules and regulations of the SEC Office. Moreover, the Company shall give knowledge on the use of the inside information

(Translation)



to the newly appointed directors, subcommittee members and executives of the Company, including accounting and finance executives at the level equivalent to or higher than department manager and employees relating to the inside information on financial statements, financial position or the operating results of the Company for their understanding and acknowledgment of duties and responsibilities of compliance with the Company's policy on the use of the inside information, including the rules and regulations of the SEC Office and the Stock Exchange of Thailand.

12. The Company shall determine the disciplinary actions, in case of violation of use of the inside information for personal benefits, starting from written notice, deduction of wages, suspension of work without pay or dismissal insofar as being permitted by laws; whereas, the punishment thereof shall be considered from intentions of such action and the severity of such offence.

This Policy has been approved by the Board of Directors and shall be effective from June 21st, 2022 onwards.

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(Mr. Cheng Niruttinanon)
Chairman of the Board of Directors
i-Tail Corporation Public Company Limited