Policy on the Use of Inside Information and Securities Trading for Directors, Executives, and Employees

Ngernturbo Public Company Limited (the “Company”) recognizes the importance of preventing the use of the Company's inside information in order to protect the rights of and build confidence among investors and shareholders regarding the Company’s securities. To comply with the Securities and Exchange Act B.E. 2535 (1992) (including its amendments) (the “Securities Act”) and regulations relating to the use of inside information and the prevention of unfair practices concerning securities trading, the Board of Directors has established this Policy on the Use of Inside Information and Securities Trading for Directors, Executives, and Employees. This is to ensure that all directors, executives, and employees acknowledge and strictly adhere to it.

1. Educate the Company's directors and executives regarding their duties to report their securities holdings and changes in the securities holdings of themselves, their spouses or cohabiting partners, and minor children, as well as juristic persons in which the directors, executives, their spouses or cohabiting partners, and minor children hold shares exceeding 30 percent of the total voting rights and have the largest proportion of shareholding in such juristic persons. Such reports must be submitted to the Office of the Securities and Exchange Commission (the “SEC Office”) in accordance with Section 59 and the penalty provisions under Section 275 of the Securities Act and relevant regulations. This includes reporting the acquisition or disposition of securities in accordance with Section 246 and the penalty provisions under Section 298 of the Securities Act and relevant regulations.

2. Require the Company's directors and executives, including their spouses or cohabiting partners, and minor children, as well as juristic persons in which such persons hold shares exceeding 30 percent of the total voting rights and have the largest proportion of shareholding in such juristic persons, to prepare and disclose reports on securities holdings and reports on changes in securities holdings to the SEC Office. They are also required to prepare and disclose reports on the acquisition or disposition of securities in accordance with the criteria specified in the Securities Act and relevant regulations, and to submit copies of such reports to the Company on the same day they are submitted to the SEC Office.

3. Prohibit directors, executives, employees, and workers of the Company and its subsidiaries, including other persons presumed to know or possess information that has

not yet been generally disclosed to the public and is material to changes in the price or value of the Company's securities ("Inside Information") under the Securities Act, from using or disclosing Inside Information to others, whether directly or indirectly, knowing or reasonably knowing that such persons may use the information for the benefit of trading securities, whether for themselves or for others. This applies unless the act is not considered taking advantage of others in a manner prescribed by relevant notifications of the Securities and Exchange Commission, until such Inside Information has been disclosed to the Stock Exchange of Thailand.

4. Prohibit the Company's directors and executives, including employees and workers who are aware of the Company's financial information or Inside Information, from trading securities during the 30-day period prior to the public disclosure of the financial statements or Inside Information. They must not trade the Company's securities until 24 hours have passed since the complete disclosure of such information to the public.

5. Prohibit directors, executives, employees, and workers of the Company, or former directors, executives, employees, and workers of the Company, from disclosing Inside Information or the Company's secrets, as well as the confidential information of the Company's business partners, which they have come to know from performing their duties, to outsiders, regardless of whether the disclosure of such information causes damage to the Company and its business partners.

6. Directors, executives, employees, and workers of the Company, or former directors, executives, employees, and workers of the Company, have a duty to maintain the confidentiality of the Company's secrets and/or Inside Information, and have a duty to use the Company's Inside Information solely for the benefit of the Company's business operations. It is prohibited for directors, executives, employees, and workers of the Company to use the Company's secrets and/or Inside Information to seek benefits for themselves or others, whether directly or indirectly, and whether or not they receive compensation.

7. Directors, executives, or employees and workers of the Company who possess Inside Information should be cautious in keeping documents, copies of documents, as well as destroying documents, and keeping and deleting electronic data that is confidential when it is no longer necessary to use, as it may be disclosed or used inappropriately.

8. Directors, executives, employees, and workers of the Company who possess confidential information or Inside Information should be cautious when conversing or discussing confidential information with individuals inside or outside the department, to prevent unrelated persons from having access to or overhearing the information.

9. In order for the Company to have a sound internal control system to prevent the leakage of confidential information or Inside Information, the Company has categorized groups of persons/departments that possess confidential information or Inside Information. This is to limit the number of persons/departments who have access to the information or are involved with confidential information or Inside Information due to the performance of their duties.

In this regard, if there is any action that violates the aforementioned regulations, it may constitute an offense as prescribed in relevant laws, and the Company will consider it a disciplinary offense under the Company's work regulations. The Company will consider imposing punishments as appropriate to the case, ranging from verbal warnings, written warnings, probation, wage deductions, temporary suspension without pay, and termination of employment. The punishment will be determined based on the intent of the action and the severity of the offense.

Policy Review

The Company's policy on the use of inside information will be reviewed, and its adequacy and suitability will be assessed on an annual basis.