

## **Insider Trading Prevention Policy (Insider Trading)**

Amata VN Public Company Limited, its associates, subsidiaries, and affiliates (the Company) recognize that the Company's personnel knowing inside information that has not been disclosed to the public and using that information for the benefit of securities trading is unfair to general investors and against the law, which damages and undermines the investors' confidence in the Company.

Therefore, the Company is committed to conducting business with integrity, morality, and ethics under the principles of good corporate governance and the Company's business code of conduct by systematically managing the use of inside information. There is an internal control mechanism that takes care not to use inside information for the benefit of oneself or others, and all directors, executives, and employees are supervised to strictly comply with relevant laws, regulations, policies, and practices to build confidence and trust in investors in the Company's securities to receive reliable information equally and in a timely manner, including maintaining the best rights and benefits for investors.

### **Definitions**

**Inside information** refers to material information that affects price changes or investment decisions and information that has not been disclosed to investors and the general public, including information about the Company or insiders that are likely to be significant to price changes, the value of securities, or investment decisions. This includes information about listed companies, major shareholders, controlling authorities, or key executives of listed companies, and is fairly clear information for general investors to use in making investment decisions.

**Information affecting trading** refers to information based on the rules that regulatory authorities require listed companies to disclose to investors. This includes information about profit, income with significant changes, declaration or omission of dividend payment, capital increase or decrease, joint ventures, mergers, major new product releases, major developments about resources, technology, products, and markets, or significant discoveries about natural resources, significant changes in accounting policies, changes in controlling authority, legal disputes, etc.

**Conflict of interest** refers to situations or actions in which directors, executives, or employees have their own interests and those of others that affect fair decisions, performance of their duties and responsibilities, and consideration of the Company's common interest.

**Related person** refers to persons who may cause the directors or executives of the company to have conflicts of interest and affect fair decisions in operating, whether taking into account the interests of that person or the best interests of the company as important, including:

1. Directors, executives, major shareholders, and controlling persons of the Company, who will be nominated as directors or executives or controlling persons, as well as related persons and close relatives of such persons.
2. Any legal entity having a major shareholder or controlling person as a person under (1).
3. Any person whose circumstances indicate that he is acting on his behalf or under the influence of (1) and (2).
4. Directors of juristic persons who have control over the company.
5. Spouse, child, or minor adopted child of the director under (4).
6. A legal entity over which the person under (4) or (5) has control.
7. Any person acting with the understanding or agreement that if the Company transacts transactions that provide financial benefits to such persons, the following persons will benefit financially:
  - 7.1 Directors of the Company
  - 7.2 Executives of the Company
  - 7.3 Persons with control over the Company
  - 7.4 Directors of persons having control over the Company
  - 7.5 Spouse, child, or minor adopted child of a person under 7.1 to 7.4

## **Practices**

Directors, executives, or employees must perform their duties with prudence and honesty and not take any action that causes a conflict of interest, directly or indirectly, under the principles of good corporate governance and the business code of conduct, taking into account the best interests of the Company in order to prevent the misuse of inside information. The Company has established guidelines as follows:

1. Directors, executives, employees, and related persons comply with laws, regulations, policies, and practices, as well as measures related to the use of inside information applicable in all countries in which the Company conducts business.

2. Directors, executives, employees, and related persons must not disclose or use documents or confidential inside information of the Company for personal gain and/or related persons, both in the course of their duties and after their termination.
3. Directors, executives, employees, and related persons must not sell, buy, transfer, accept transfer of the Company's securities or make any transactions using information affecting the trading of confidential and/or insider information of the Company that has not been disclosed to the public.
4. Directors and executives of the Company are obliged to prepare a report every time there is a change in the holding of securities, both of themselves, their spouses, and minor children, within three working days from the date of purchase, sale, transfer, or acceptance of the transfer of securities, or in accordance with requirements of the regulatory authorities.
5. Directors, executives, employees, and related persons do not trade the Company's securities within one month prior to the disclosure of quarterly and annual financial statements and within a 24-hour period after the financial statements or other inside information has been disclosed to the public (Blackout Period), including other periods as prescribed by the regulatory authorities.
6. The Company protects and secures information in its information systems by regularly tracking, controlling, and monitoring access to the Company's information from third parties, as well as defining employee access rights in accordance with clear roles and responsibilities.
7. In the event that a third party engages in ad hoc work on inside information and information affecting the trading of the Company's securities, a confidentiality agreement must be concluded until such information is disclosed to the public.

### **Duties and Responsibilities**

To ensure that this policy will be implemented throughout the organization and with clear supervision. The Company therefore determines the duties and responsibilities of individuals or departments within the organization as follows:

### Board of Directors

- 1) Consider approving and reviewing the policy to prevent misuse of inside information appropriate to the business context and risk factors, reviewed at least once a year or when appropriate.
- 2) Supervise business operations to be in line with relevant laws, rules, regulations, policies, and guidelines, as well as encourage concrete implementation of this policy.
- 3) Avoid any activities that may lead to that situation or suggestions that will cause violations of this policy.
- 4) Consider urgent issues regarding the misuse of inside information to ensure timely action.
- 5) Encourage and support management to recognize and prioritize the prevention of misuse of inside information and cultivate an organizational culture.

### Executives

- 1) Provide rules, procedures, and preventive measures appropriate to the context of each company and in accordance with the policies, procedures, and laws of the countries in which the Company conducts business.
- 2) Establish an organizational structure with responsible individuals and clear responsibilities and roles while allocating appropriate and adequate resources.
- 3) Provide for the development and review of a sufficiently effective risk management, internal control, and internal audit systems for the use of inside information.
- 4) Define employee access rights to information in accordance with clear roles and responsibilities, as well as regularly tracking, supervising, and monitoring access to the Company's information from both internal and external parties.
- 5) Monitor, oversee, manage, and support compliance with relevant laws, policies, measures, and procedures related to the use of inside information, as well as developing and improving practices to be more effective.
- 6) Act as a good role model by avoiding any activity that may lead to situations or suggestions that could result in policy violations.

- 7) Communicate to build understanding and support subordinates at all levels to recognize the importance of policy compliance and cultivate an organizational culture.
- 8) Consider the report on the performance of the policy before presenting it to the Board of Directors.
- 9) Provide channels for whistleblowing and receiving complaints about violations of the policy on the prevention of the misuse of inside information, including the complaint handling process and protection measures for whistleblowers, complainants, witnesses, and information reporters.

**Departments or Individuals Responsible for Prevention of Misuse of Inside Information**

- 1) Establish procedures and measures related to the prevention of misuse of inside information and the management of confidential information that affects the price of securities that is clear and consistent with the context of the business.
- 2) Establish clear procedures for disclosure, retention of inside information, and reporting of holdings and changes in securities holdings and future contracts with respect to securities.
- 3) Assess and manage the risk of leakage or misuse of information, including guidelines for prevention and mitigation.
- 4) Establish a process for dealing with the occurrence of rumors, information leakage, and accidental disclosure of information, including a review process after providing information to stakeholders in order to review the accidental provision of inside information.
- 5) Prepare information regulations for internal and external persons who are classified as insiders who have access to confidential information of the Company and keep it up to date.
- 6) Develop internal control, risk management, and policy compliance monitoring to be effective and concise, as well as informing and following up with relevant departments for regular improvement and correction.

- 7) Follow up, inspect, collect, and prepare reports on the prevention of misuse of inside information and disclose inside information that affects securities trading in accordance with requirements of the regulatory authorities.
- 8) Regularly report risk information or significant issues related to the prevention of misuse of inside information to management and report immediately in the event of an abnormality.
- 9) Coordinate and integrate cooperation with relevant internal agencies to jointly formulate management measures, control mechanisms, and solutions.
- 10) Communicate and train in order to raise awareness about the prevention of misuse of inside information to directors, executives, employees, and relevant stakeholders on an ongoing basis, including alerting internal stakeholders to refrain from trading in the Company's securities during the period specified by the regulatory authorities.
- 11) Provide initial suggestions on the implementation of the policy, as well as coordinate or discuss with other relevant departments to ensure that the suggestions are correct, complete, and clear.
- 12) Report the results of the policy compliance to the Board of Directors, executives, or relevant agencies.
- 13) Review the policy on the prevention of misuse of inside information in accordance with relevant laws, regulations, and practices.

#### Employees

- 1) Learn, understand, and comply with laws, rules, regulations, policies, and guidelines, including relevant standards.
- 2) When someone is found to have committed an offense or committed an act that violates this policy, the information or complaint must be reported through the Company's whistleblowing channels.

#### **Communication and Training**

The Company provides communication of the policy on the prevention of misuse of inside information through training, orientation, meetings, or activities in various forms that are

appropriate for the directors, executives, employees, subsidiaries, associates, other companies that the Company has the authority to control, business representatives, and suppliers, as well as relevant stakeholders, along with evaluating their effectiveness for continuous improvements.

### **Whistleblowing**

Those who see an action that qualifies as a violation of this policy must complain or report it according to the procedures of the whistleblowing policy. The complainant or whistleblower will be protected, and the information will be kept confidential without impacting their position or compensation, both during the investigation and after the completion of the process.

### **Penalty**

The policy on the prevention of misuse of inside information is part of the discipline of the work. The directors, executives, and employees who do not comply will be investigated and considered for disciplinary action according to the Company's regulations. In the event of an investigation, all employees must fully cooperate with internal and external authorities.

In the meantime, the Company will not demote, punish, or adversely affect directors, executives, and employees who reject actions intended to violate this policy, even if such actions cause the Company to lose business opportunities.

Therefore, this notification is announced for acknowledgment and thorough observance.

Announced on February 25, 2025.

- Signature -

(Dr. Apichart Chinwanno)

Chairman of the Board of Directors