



# INSIDE INFORMATION POLICY

EUROASIA TOTAL LOGISTICS PUBLIC COMPANY LIMITED

REVISION 3

EFFECTIVE DATE 20 FEBRUARY 2025



#### Preparation and Approval History

Document No.	Editor/Controller	Reviewer	Approver
CP-BOD-011-02	Managing Director	Chief Executive Officer	Board of Directors
	3 January 2025	30 January 2025	20 February 2025

#### Revision History

Revision	Revision Date	Effective Date	Revision details
1	10 October 2021	9 November 2021	First issue
2	10 June 2022	6 August 2022	Revise company name after conversion to public limited company
3	3 January 2025	20 February 2025	Annual review

Note: To add or cancel any document, proceed according to the acts set out in the Approval and Implementation Authority.

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## Inside Information Policy

Euroasia Total Logistics Public Company Limited ("the Company") and its subsidiaries operate their business with transparency and awareness of the importance of using inside information to prevent misuse of inside information, which may affect the Company's business operations as well as the securities or the price of the Company's securities and cause inequality in receiving the company information and resulting in anyone benefiting from the use of such Inside Information. To comply with the Securities and Exchange Act B.E. 2535 (1992) (including amendments) ("Securities and Stock Exchange Act") including any related announcements, rules and/or regulations, the Company has formulated the policy on the use of Inside Information as follows:

### Policy and Practical Guideline

1. Directors, executives, staff, and employees of the Company and its subsidiaries knowing or possessing the "Inside Information" and/or in a position or line of responsibility of the "Inside Information" or who can access the "Inside Information" are prohibited as follows:
  - (1) Buying or selling the Company's securities or entering into a derivatives contract related to the Company's securities, whether for oneself or another person.
  - (2) Disclosing the "Inside Information" to others, either directly or indirectly, by any means, where they know or should know that the recipient of the information may use that information for use in the purchase or sale of the Company's securities or to enter into a derivative contract relating to the Company's securities, whether for oneself or another person.

The term "Inside Information" means information that has not yet been disclosed to the general public, which is material to changes in the price or value of the Company's securities, for example, the Company's information that is likely to be material to changes in the price or value of securities or investment decisions. Such information includes, but is not limited to, information about the Company, major shareholders, authorized controller or key executives of the Company and is fairly clear information that general investors should use in making investment decisions.



2. Directors, executives, staff, and employees of the Company and its subsidiaries in the financial line must
  - (1) Suspend the purchase or sale of the Company's securities, whether for oneself or others, and
  - (2) Not disclose financial information to other persons, whether directly or indirectly.

In this regard, the abovementioned actions should be done before the publication of the annual or quarterly financial statements at least 30 days before the Company discloses such information to the Stock Exchange of Thailand, and it should wait at least 24 hours after the disclosure of such information before buying or selling the Company's securities.

3. If the Company's trade partners and its subsidiaries are companies whose shares are listed on the Stock Exchange of Thailand and enter into transactions with such trading partners, it may be considered as the "Inside Information" of the partners. In this regard, the directors, executives, staff, and employees of the Company (and its subsidiaries) are responsible for the "inside information" of such partners in the same way as the "inside information" of the Company under Article 1 above.
4. In case the company has the "inside information" at a time when it cannot be disclosed due to inconclusiveness or high uncertainty, relevant directors, executives, staff, and employees of the Company (and subsidiaries) are responsible for maintaining the confidentiality of such information to prevent any person from exploiting it or revealing it wrongly. Such persons should comply with the guidelines for handling confidential information affecting securities prices prepared by the Office of the Securities and Exchange Commission ("SEC"). The details are shown in Attachment 1.

In addition, it is necessary to disclose the inside information to those involved in the relevant role of necessary implementations to the company, such as legal advisors serving transaction advisory or credit rating agencies (CRAs), related directors, executives, staff, and employees of the Company, and its subsidiaries must ensure that recipients of information are aware of their duties and there is a system to maintain confidentiality of information to prevent its use or disclosure to others.

In this regard, the guidelines for the management of confidential information affecting securities prices prepared by the SEC shall be applied. The details appear in Attachment 1.



5. The Company will arrange to provide training on the policy on the use of inside information to directors, executives, staff, and employees of the Company and related subsidiaries once a year to review their understanding and ensure compliance with the Securities and Exchange Act.

Moreover, the Company will provide training to educate directors and executives taking up new positions regarding their duties to prepare and disclose reports on holdings and changes in securities holdings of directors and executives as well as those related to directors and executives under Section 59 of the Securities and Exchange Act and related announcements of the SEC. Directors and/or executives may submit the report through the Company Secretary.

6. In the event that the Company holds shares or any other securities in other companies whose shares are listed securities in the Stock Exchange of Thailand, it must not appear that the directors, executives, staff, employees of the Company take any action that may significantly affect the change in the share price or the securities of that listed company or may cause the general public to misunderstand the price or trading volume of such stocks or securities.

7. Implementing measures when it is found that inside information is used in violation of this policy

(1) **In case of directors** Any director who has been judged to the extent that he is disqualified to hold a directorship with characteristics indicating lack of suitability to be entrusted to manage the public holding business according to the Public Company Limited Act B.E. 2535 (1992) (including amendments), Securities and Exchange Act, and related announcements of the SEC, that director is disqualified for holding a directorship of the Company, which is in line with the relevant laws, and may be subject to criminal and civil liability under the Securities and Exchange Act.

(2) **In case of executives or employees of the Company and its subsidiaries**, there must be the establishment of an investigation committee to investigate the facts and determine appropriate penalties. If it is found guilty after the investigation, the Company or its subsidiary may have a warning letter or may have a resolution requiring that executive or employee to suspend their job, resign from the job, or transfer to a position that cannot make use of inside information or is a position that is not related to the original position. However, such penalties will depend on the intention of committing the offense, knowledge and experience in the profession of the offender



as a reasonable person, severity of the damage and its impact on the Company and its subsidiaries. However, it must be in accordance with the regulations of the Company or its subsidiaries, relevant laws as well as the terms or rules according to the relevant announcements.

This inside information policy was considered and approved by the Board of Directors at the Board of Directors' meeting No. 2/2025 on February 20, 2025. It shall be effective from February 20, 2025 onwards.

Note: This English translation is for reference purposes only. In the event of any discrepancy between the Thai original Inside Information Policy and this English translation, the Thai original shall prevail.

Mr. Komol Rungruangyot

Chairman of Board of Directors

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