



INVESTOR RELATIONS CODE OF CONDUCT

EUROASIA TOTAL LOGISTICS PUBLIC COMPANY LIMITED

ISSUE 2

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Preparation and Approval History

Document No.	Editor/Controller	Reviewer	Approver
CP-BOD-027-02	Managing Director	Chief Executive Officer	Board of Directors
	1 September 2023	1 September 2023	11 September 2023

Revision History

Issue	Issue Date	Effective Date	Revision details
1	25 October 2022	8 November 2022	First issue
2	1 September 2023	12 September 2023	Amend email address of Investor Relations

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



Investor Relations Code of Conduct

Euroasia Total Logistics Public Company Limited (“Company”) places great importance on the disclosure of information that is accurate and equitable. Both report information on operating results as well as general information, and provide investor relations agencies for equitable communication between shareholders and investors with the Company. Inquiries can be reached by phone: +662 123 1727, website: www.etl.co.th and email: ir@etlgps.com

In addition, in order to ensure the correct performance of the Company's investor relations. The Company has established the Company's Investor Relations Code of Conduct to guide its operations as follows;

1. Disclosing material information correctly, sufficiently and timely
 - IROs need to disclose material information in accordance with the rules and regulations of the authorities concerned, such as the SEC and the SET.
 - IROs can refuse to provide trade secrets or that which would give competitors a competitive edge.
 - IROs should provide clear and sufficient information for making investment decisions.
 - When rumors or news leaks surface, IROs should immediately clarify the facts to the public in accordance with the SET and the SEC rules and regulations.
 - IROs must not disclose inaccurate information with the intention to manipulate share trading.
 - IROs should establish dissemination channels that treat all stakeholders fairly and equally.
2. Handling inside information
 - Establish guidelines for the use and control of inside information. For example, access to inside information should be limited and IROs who can access such information must not provide it to any outsider prior to compulsory public disclosure.
 - IROs must strictly comply with rules and regulations relating to the use and control of inside information. For example, any information that has an effect on operational performance must be disseminated through the SET's electronic system before being provided to others.



- The blackout period is prohibited from trading in the company's shares by persons who know the companies inside information, including the investor relations, for a period of 1 month prior to the date of the financial statement announcement and one day after the financial statements are announced.
- Set a quiet period of 14 days prior to the date of publication of the financial statements.
- If the company plans to host an analyst meeting before earning results are publicly disclosed (an earnings preview), such previews should be done before the quiet period and must be done very carefully. Any prohibited data, such as estimated revenue and net profit, must not be disclosed.

3. Disclosing information fairly and equitably

- IROs must provide all stakeholders with equal opportunity to access to information. While activities hosted for each group of stakeholders may differ, the information provided must be the same and not benefit only a particular party.
- IROs should provide equal opportunity for all stakeholders to contact or make enquiries. Special privileges for any particular group of stakeholders are unacceptable.
- IROs should publicly disclose any data which have been presented exclusively at a particular event, such as a roadshow or analyst meeting, on that firm's website right after the event or as soon as possible.
- IROs should take care in communicating through social networks. They should follow and monitor news and views so as to understand investors' perceptions. In case they need to clarify any misunderstandings, they should first inform the public through the SET's online system, in order to avoid giving preference to any particular group of investors.
- IROs should treat each group of stakeholders as follows:

3.1 Investors

- All investors, retail or institutional, should be treated equally.
- Retail investors should have access to data at the same level as those provided to analysts and institutional investors.
- IROs should not discriminate in accepting a one-on-one meeting with investors. If they are not able to meet everyone, guidelines for accepting meetings should be clearly established and strictly followed.



- IROs should take care in arranging activities such as company visits or investor meetings, keeping benefits to the firm and cost-effectiveness among company's top priorities.

3.2 Analysts

- IROs should give all analysts equal opportunity to attend analyst meetings arranged by the company.
- IROs should not give any gift or incentive to analysts with the intention to influence research findings or reports.

3.3 Media

- IROs should provide information and opportunity for the media to have access to data as deemed appropriate.
- IROs should not use business conditions or benefits to influence media, such as buying advertisements in a given publication, to persuade the media to report positive news about the company.
- IROs should not give any gift or other incentive to media with intention to motivate them to report positive or groundless news.

3.4 Regulators

- IROs should cooperate in providing information when requested by regulators.
- IROs should not give any present or incentive to regulators with expectation of return in terms of special treatment.

3.5 Internal parties

- IROs should arrange meetings for management to discuss issues of concern with all stakeholders as deemed appropriate.
- IROs should report all useful information to the board and management, such as IR activities, comments from analysts and investors, and capital market sentiment.
- IROs should communicate the company's IR code of conduct to all employees such as how to handle inside information etc., so that they all understand and behave the same way.



3.6 Others such as financial institutions and credit rating agencies

- In principle, IROs must provide the same level of information to all stakeholders. Inside information can be given only when it is a must, for example, when there is a request from a financial institution to use in considering project financing. However, such information must be handled with caution and in accordance with a signed confidentiality agreement.

4. Performing duties with integrity

- IROs should refrain from acting in such a way that could be seen as a conflict of interest, such as using company assets for personal gain.
- IROs should not seek personal gain from relationships and information obtained in performing duties for the company.
- IROs should comply with all policies and other codes of conduct established by the company.

5. Other issues

- IROs should dress properly with respect to people, venues, activities and event-related protocol.
- IROs should not spread negative information about nor accuse against competitors or other stakeholders.
- IROs should not put personal gain before the company's when working with third parties. For example, they should not participate in roadshows with only brokerage firms that offer special treatment to themselves.



This Investor Relations Code of Conduct was considered and approved by the Board of Directors at the Meeting No. 6/2023 on September 11, 2023. It shall be effective from September 12, 2023 onwards.

Note: This English translation is for reference purposes only. In the event of any discrepancy between the Thai original Investor Relations Code of Conduct and this English translation, the Thai original shall prevail.

Mr. Krishna Boonyachai
Chairman of Board of Directors

Euroasia Total Logistics Public Company Limited