



บริษัท ศรีตรังแอกโรอินดัสทรี จำกัด (มหาชน) สาขารุงเทพ

อาคารบารุคเวนเจอร์ส ฮิลล์ ชั้นที่ 1701, 1707-1712 ชั้น 17
เลขที่ 57 ถนนวิภาวดี แขวงจตุจักร เขตจตุจักร กรุงเทพฯ 10330 ประเทศไทย

TEL : 0-2207-4500 FAX : 0-2108-2241-44 เลขประจำตัวผู้เสียภาษีอากร 0107536001656 สาขาที่ 00003

SRI TRANG AGRO-INDUSTRY PUBLIC COMPANY LIMITED (BANGKOK BRANCH)

17TH FLOOR, PARK VENTURES ECOPLEX UNIT 1701, 1707-1712

57 WIRELESS ROAD, LUMPINI, PATHUMWAN, BANGKOK 10330, THAILAND

Policy for the Use of Inside Information

Sri Trang Agro-Industry Public Company Limited (the ‘Company’) and its subsidiaries operate business with transparency and are aware of the importance of the use of inside information. To comply with the Securities and Exchange Act, B.E. 2535 (as amended) (the ‘SEC Act’) including relevant rules and regulations, the Company sets out this Policy for the Use of Inside Information and measures to prevent the disclosure or use of confidential and/or non-public inside information of the Company by directors and executives including those holding an executive position in accounting or finance at the level of division manager or higher including employees of the Company and its subsidiaries for their own benefit or for others’ benefit, either directly or indirectly and irrespective of whether such disclosure or use of confidential and/or inside information would be for consideration. This also extends to the use of inside information for the purpose of securities trading.

Practice guideline

1. The Company will educate its directors and executives on the obligation to prepare and disclose reports on securities holding and the change thereof of (a) such directors and executives themselves, (b) their spouses or de facto partners; (c) minor children and (d) a legal entity in which the director or executive, his or her (b) and (c) collectively hold shares more than 30 per cent of the total voting rights, provided that such aggregate shareholding is considered the largest shareholding in such entity. The reports shall be disclosed to the Office of the Securities and Exchange Commission in accordance with Section 59 of the SEC Act and the relevant notification of the Office of the Securities and Exchange Commission. The Company shall also educate its directors and executives on the reports on acquisition or disposal of securities in accordance with Section 246 of the SEC Act and relevant notifications of the Capital Market Supervisory Board.
2. The Company requires that each director and executive prepare and submit to the Company Secretary reports on securities holding and the change thereof of (a) such directors and executives themselves, (b) their spouses or de facto partners; (c) minor children and (d) a legal entity in which the director or executive, his or her (b) and (c) collectively hold shares more than 30 per cent of the total voting rights, provided that such aggregate shareholding is considered the largest shareholding in such entity. The reports shall have the prescribed format of the Office of the Securities and Exchange Commission. Each submission of the reports to the Company Secretary shall be made on the same day with the submission of the relevant reports to the Office of the Securities and Exchange Commission. Reports on securities holding and the change thereof and an acquisition or disposal of securities shall be prepared using methods and submitted within the period specified under the SEC Act and relevant notifications of the Office of the Securities and Exchange Commission. The Company Secretary shall report the same to the Board of Directors on a quarterly basis.
3. The Company prohibits the use of inside information by definition given under the SEC Act by directors, executives and relevant staff and employees including those assumed to have been aware of or in possession of non-public inside information that is price sensitive or which may have an impact on the decision of investors in purchasing or selling securities of the Company, or which may cause damage to investors who wish to invest in securities of the Company. The prohibited use of inside information includes the use of inside information for purchasing, selling, offering to purchase or to sell or soliciting others to purchase, sell, offer to purchase or to sell securities of the Company, either directly or indirectly, and irrespective of whether such an act will be for the benefit of themselves or for the benefit of others, or the disclosure of such information for others to perform such acts, and whether the act is committed for consideration. In addition, such directors and executives, relevant staff and employees including their spouses or de facto partners and minor children shall refrain from purchasing, selling, offering to purchase or to sell or soliciting others to purchase, sell, offer to purchase or to sell securities of the Company, either directly or indirectly, during the period before the disclosure of the Company’s annual and quarterly financial statements and financial performance or information relating to financial and status of the Company until such time when the information has become public. The Company will issue a letter to notify its directors, executives, staff and employees including those assumed to have been aware of or in possession of the inside information to refrain from trading in securities of the Company for at least one month prior to the public disclosure and at least 24



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อาคารปาร์คเวนเชอร์ อีโคเพล็กซ์ ห้องเลขที่ 1701, 1707-1712 ชั้น 17
เลขที่ 57 ถนนวิทยุ แขวงลุมพินี เขตปทุมวัน กรุงเทพฯ 10330 ประเทศไทย

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hours after the information has become public. It is also prohibited to disclose such material information to any person by any means.

4. The Company requires that its directors, executives and employees including those of its subsidiaries maintain confidentiality of confidential and/or inside information of the Company and its subsidiaries including that of the business partners of the Company and its subsidiaries which has become available to them as a result of the performance of their duties. The use of confidential information and/or inside information of the Company and its subsidiaries including that of business partners of the Company and its subsidiaries shall be prohibited in any cases although such disclosure of information may not cause any damage to the Company, its subsidiaries or business partners.
5. The Company prohibits its directors, executives and employees of the Company and its subsidiaries from disclosing inside information of the Company and its subsidiaries. Directors, executives and employees of the Company and its subsidiaries are also prohibited from exploiting non-public inside information or material information made available to them during the course of their duties in the Company and/or its subsidiaries or from disclosing such non-public inside information or material information to the third parties for their own benefits or for others' benefits, either directly or indirectly, and irrespective of whether it is for consideration or not.
6. The Company puts in place a measure to impose sanctions against personnel who fail to comply with the Policy for the Use of Inside Information. Any use of inside information, either directly or indirectly, for personal benefits or for the benefits of others, irrespective of whether it is for directly or indirectly consideration or not, will be subject to disciplinary actions determined by the Company or to the sanctions of the law. Punishments will be assessed based on the intent of the action and the seriousness of the offence.

The Board of Directors considered and approved the Policy for the Use of Inside Information in the Board of Directors' meeting No. 6/2019, which was held on 19 September 2019. The policy shall come into force as from 19 September 2019.