

Insider Trading Policy

KCG Corporation Public Company Limited

Insider information is important information that has not yet been disclosed to the public, which has an impact on securities price. If any individual becomes aware of such information due to their position, status, or any means, they may exploit the insider information for personal gain or potentially diminish the Company's benefits.

1. Principles and Reasons

KCG Corporation Public Company Limited and its subsidiaries ("Company") operate a business with transparency and are aware of the material insider information. The Company has set out this insider trading policy to prevent the disclosure of confidential and/or insider information by directors, executives, and employees of the Company and its subsidiaries for their own or other interests directly or indirectly, regardless of whether personal gain has been received, including trading the Company's securities.

2. Objectives

To prevent the unauthorized use of insider information for improper gains and potential damages to the Company or to ensure equal treatment of all shareholders in compliance with the Securities and Exchange Act, B.E. 2535 (and amendments) ('SEC Act') including relevant notifications, rules and/or regulations.

3. Insider Trading Policy

3.1 Directors, executives, and employees, who may have knowledge or access to insider information, as well as those in positions or responsible for insider information, are prohibited from engaging in the following actions:

3.1.1 Buying or selling the Company's securities, or engaging in futures contracts related to the Company's securities whether for personal gain or on behalf of others.

3.1.2 Disclosing insider information to other persons, directly or indirectly, by any means, knowing that such information may be used for trading the Company's securities, engaging in futures contract related to the Company's securities, or making offers to sell, inviting others to buy, sell, offering to buy, or sell securities of the Company, whether directly or indirectly, for oneself or for others.

"Insider Information" refers to the non-public information which has a material impact on changes in the prices or value of the Company's securities or investment decisions. This includes, but is not limited to, information about the Company, its major shareholders, controlling persons, or key executives, as well as relatively clear information that can be used by general investors to make investment decisions.

3.2 The Company shall educate directors and executives on the responsibility to prepare and disclose a report on securities holding and changes in securities holding including forward contracts of directors and executives, their spouses or cohabiting partners, and minor children. This includes a juristic person in which the spouses, cohabiting partners, and minor children collectively hold shares of more than 30% of the total voting rights, provided that such shareholding is considered the largest shareholding of the juristic person. The report shall be

submitted to the Securities and Exchange Commission in accordance with the Securities and Exchange Act Section 59 and penalties Section 275, as well as the notifications of the Securities and Exchange Commission. The report shall include the acquisition or disposition of securities in accordance with the Securities and Exchange Act Section 246, penalties in Section 298, and relevant notifications of the Securities and Exchange Commission.

3.3 Directors and Executives of the Company, including their spouse or cohabiting partner and minor children, are required to prepare, disclose, and submit the reports on securities holding and change of securities holding. This includes futures contracts to the company secretary prior to submitting them to the Securities and Exchange Commission in accordance with the Securities and Exchange Act Section 59, and penalties in Section 275. The securities holding report shall be submitted within 30 days from the date of appointment as a director or executive. The changes in securities holding reports shall be submitted within 3 business days from the date of purchase, sale, transfer, or acceptance of transfer of securities.

3.4 Directors, executives, and employees of the Company holding positions in the accounting or finance department are required to:

3.4.1 Avoid trading the Company's securities, whether for oneself or for others and;

3.4.2 Not disclose the Company's financial information to any other persons, whether directly or indirectly.

During the 30 days prior to the disclosure of quarterly and annual financial statements to the Stock Exchange of Thailand (SET), those who have access to insider information are prohibited from disclosing such information. Any person with access to the insider information may begin trading the Company's securities 24 hours after its disclosure.

3.5 In the case that the Company's business partner is a company whose securities are listed on the Stock Exchange of Thailand and if any transaction is conducted with the business partner, the information related to the transaction may be regarded as the business partner's insider information. In this case, directors, executives, and employees of the Company are responsible for handling the insider information of the business partner in the same manner as the Company's own insider information as mentioned in Clause 3.1.

3.6 If the Company has insider information that cannot be disclosed due to ongoing uncertainties or pending conclusions, directors, executives, and relevant employees have the responsibility to manage and safeguard such confidential information to prevent any exploitation of insider information. Any related persons shall comply with the "Guidelines for Market-Sensitive Information" by the Securities and Exchange Commission.

If it is necessary to disclose insider information to individuals with relevant responsibilities and roles in carrying out essential operations for the Company, such as banks, financial advisors, legal advisors providing transactional advice or reputable rating agencies, it is the

responsibility of the relevant Board, executives, and employees to manage and protect the confidentiality of such information. This is to prevent any unauthorized use or disclosure of the information. The aforementioned parties are required to adhere to “Guidelines for Market-Sensitive Information” by the Securities and Exchange Commission.

The Company will conduct training on the insider trading policy at least once a year for directors, executives, and employees. This training is intended to review the understanding and ensure compliance with the Securities and Exchange Act.

Moreover, the Company will provide training to the new directors and executives regarding their responsibilities in preparing and disclosing reports on securities holdings and changes in securities holdings of directors, executives, and related persons, as stipulated in the Securities and Exchange Act Section 59 and relevant notifications of the Securities and Exchange Commission. These reports may be submitted through the company secretary.

- 3.7 If the Company holds shares or other securities in other listed companies, directors, executives, employees of the Company, and/or any other related persons or stakeholders involved in investment decisions of such company shall avoid any actions that could have a significant impact on the price of the stock or securities or cause the general public to misunderstand their price or trading volume.
- 3.8 If directors, executives, or related employees violate the insider information policy stated in this document, the Company will regard such violations as a serious disciplinary offense that may result in the termination of their positions as directors, executives, or employees. The Company will determine the disciplinary action based on the intention behind the violation and the severity of the offense.

4. Enforcement

The insider trading policy shall take effect on the announcement date.

This was announced on November 1, 2022.

Dr. Chaiwat Wibulsawat
Chairman of the Board
KCG Corporation Public Company Limited