



Inside Information Retention and Prevention Policy

Reviewed on 17 January 2024

G-Able Public Company Limited (the “**Company**”) manages its operations by adhering to business practices of honesty, integrity, transparency, and in accordance with good corporate governance principles. To ensure that the Company discloses information to all groups of stakeholders equally, and inside information that may affect the Company are kept and protected to the use, the Company has established a policy for the retention and protection of inside information for the directors, executives, employees, and related parties to use as a guideline for their discharge of duties. Without proper measures for effective oversight or in cases of misuse of such information, it may lead to unfair or inappropriate actions and adversely affect the Company.

Personnel at all levels of the Company shall strictly comply with the Company’s code of conduct and business ethics and shall follow the inside information retention procedures to protect the disclosure of information and the unauthorized use of insider information. “**Inside information**” refers to:

1. Information of the Company that has not yet been disclosed to the public and is material to the changes in the price or value of the Company’s securities.
2. Information of the Company that is prohibited from being disclosed to the public.
3. Information of the Company that is prepared to be disclosed to the public but has not been officially disclosed.

Guidelines

1. The Company has established a hierarchy of importance for inside information, where the sensitive information shall be handled in a specific way. The information is categorized by priority, including disclosed information, information prepared for disclosure, and confidential information. The use of inside information shall be within the scope of assigned duties and responsibilities only.
2. The Company shall keep customer and trade-related information confidential and shall not disclose customer information to employees or unrelated third parties, unless required by law to disclose publicly or approved by the Board of Directors and/or the Executive Committee.
3. In the event of employing individuals who have previously worked with competitors or government entities, the Company shall review any confidentiality agreements these individuals have entered with. The Company shall not take any actions that would lead these individuals to breach their agreements with competitors or government entities, that will potentially cause legal action.
4. The disclosure of inside information to the public requires approval from the Chief Executive Officer. The Chief Executive Officer may provide the information to the public personally if the information is significantly material or may delegate the responsibility to another department. In addition, the Company has an Investor Relations to coordinate and provide information to the public.
5. The personnel of the Company shall not answer questions or provide comments to third parties unless they are assigned to do so.

6. Directors, executives, officers and employees of the Company and its subsidiaries, including spouses and minor children of such persons, are prohibited from using inside information of the Company and its subsidiaries that may affect the change in the price of the Company's securities which has not been disclosed to the public, for the purpose of buying, selling, offering to buy, offering to sell, or encouraging others to buy, sell, offer to buy, or offer to sell securities of the Company, whether directly or indirectly, before such information is disclosed to the public. Any such actions, whether taken for personal gain or for the benefit of others, or to induce others to engage in such actions for personal gain, will result in disciplinary measures by the Company and its subsidiaries.
7. Directors, executives and employees of the Company and its subsidiaries who know the Company's inside information are prohibited from disclosing such information to third parties or any persons not related to their responsibilities. Furthermore, directors and executives of the Company, including their spouses and minor children, are prohibited from buying or selling the Company's securities during one month prior to the disclosure of the financial statements or any significant information to the public and at least 24 hours after the disclosure of the financial statements or significant information to the public.
8. Directors and executives, including persons who hold the executive positions in accounting or finance with manager level up or equivalent, shall personally do by themselves together with their spouses or minor children including juristic persons (that directors, executives, spouses or minor children of such directors and such executives collectively holding shares more than 30 percent of the total number of voting rights and the combined shareholdings of the largest proportion in such juristic persons) to report to the Company's Board of Directors (through the Company Secretary) about their securities transactions regarding the Company at least one day in advance before securities trading. After the securities transaction has been executed, a report on changes in securities holding shall be prepared, disclosed and submitted to the Securities and Exchange Commission (the "SEC") in accordance with the regulations set forth in the Securities and Exchange Act B.E. 2535 (as amended) (the "SEC Act") and send a copy of this report to the Company Secretary at the same date of submission to the SEC. The report shall be prepared in the form determined and submit to the SEC within the following periods:
 - (a) In the case the name has not been listed in the information system of the SEC
 - The Company shall submit the name of directors and executives into the information system of the SEC in accordance with the procedures prescribed by the SEC in the Notification of the SEC Office re: Forms and Procedures for Notifying or Changing Information of Directors and Executives of the Company.
 - Directors and executives, including persons who hold the executive positions in accounting or finance with manager level up or equivalent, have a duty to report the purchase, sale, transfer, or acceptance of transfer of securities or derivatives within 7 business days from the date of purchase, sale, transfer, or acceptance of transfer of securities or derivatives.

(b) In the case the name has been listed in the information system of the SEC

Directors and executives, including persons who hold the executive positions in accounting or finance with manager level up or equivalent, have a duty to report the purchase, sale, transfer, or acceptance of transfer of securities or derivatives within 3 business days from the date of purchase, sale, transfer, or acceptance of transfer of securities or derivatives.

In this regard, the Company will share knowledge to directors and executives, including persons who hold the executive positions in accounting or finance with manager level up or equivalent and the Company's auditors regarding to the duty to report the shareholdings and report the changes of shareholdings in securities and derivatives of themselves, their spouses or minor children including juristic persons (that directors, executives, spouses or minor children of such directors and such executives collectively holding shares more than 30 percent of the total number of voting rights and the combined shareholdings of the largest proportion in such juristic persons) to the SEC as stipulated in the SEC Act.

Punishment Measures

In the event of a violation where inside information is used for unauthorized purposes, the Company will take disciplinary action to assess penalties commensurate with the offense. This may include verbal warnings, written warnings, salary deductions, suspension without pay, or even termination, depending on the intent of the action and the severity of the misconduct. Legal consequences may also be pursued according to relevant laws and regulations applicable to the specific case.