
Confidentiality of Information, Protection of Information and Insider trading Policy

v2019-1

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Opening

Namyong Terminal public Company Limited (“**the Company**”) has the amendment of Confidentiality of Information, Protection of Information and Insider trading Policy which must be responsibility of directors, the Executives, auditors, financial advisors, legal advisors, asset appraisers or any other person whose duties are related to inside information, including employees, workers or colleagues of the aforesaid persons who hold a position or is in the line of work involved in the performance of duties related to such inside information or confidentiality of information of the Company as specified by law.

Definition

“**Executive**” shall mean

1. The executive pursuant to Section 89/1 of the Securities and Exchange Act B.E 2535 (1992), as amended; and
2. The person holding top position of each line, the manager or the head of the line and so on.

“**Confidential Information**” shall mean non-public information of the Company including the personal information that the employees, staff, business partners or customers disclose to the Company which if disclosed to the public or any person shall cause effect to the Company whether it is monetary or not.

“**Inside Information**” shall mean any information including but not limited to financial documents, financial information, agreements, non-public material legal disputes which cause Effect to the Price of the Securities.

“**Effect to the Price of the Securities**” shall mean effect to the price of the securities which may be higher, lower, stable or maintain the price of the securities.

Policy and treatment

1. The directors, Executives, auditors, financial advisors, legal advisors, asset appraisers, employees or staff are responsible for the confidentiality of the Confidential Information. Each of the responsible persons shall be not disclose the Confidential Information in his/her possession to any other person. In this regard, the Company has classified the

information and determined the access to each of the classified information, as well as the keeping of the Confidential Information.

The exemption is provided in case required to be disclosed by the law or approved to be disclosed by the Chief Executive Officer, the person holding top position of the line or any person authorized by the Executive Committee or the Board of Directors.

2. The person responsible for the human resource shall ensure that any employment of the person who worked for the competitors, customers or business partners does not violate the agreement with the competitors, customers, or business partners which leads to a legal dispute with the Company.
3. Within 2 years after the termination of the directorship for whatsoever reason or the termination of employment or hire of the Executives, financial advisors, legal advisors, employees or staff of the Company for whatsoever reason, such persons shall not disclose the Confidential Information.
4. The directors, Executives, auditors, financial advisors, legal advisors, asset appraisers or any other person responsible for the Inside Information, employees or staff possessing or knowing the Inside Information or being in the title or the line that is responsible for the Inside Information or able to access to the Inside Information which causes Effect to the Price of the Securities are prohibited to trade the securities of the Company 1 month prior to the announcement of the financial statement and within 24 hours after the publication through the portal of the Stock Exchange of Thailand.
5. The directors, Executives, auditors, financial advisors, legal advisors, asset appraisers or any other person responsible for the Inside Information, employees or staff possessing or knowing the Inside Information or being in the title or the line that is responsible for the Inside Information or able to access to the Inside Information which causes Effect to the Price of the Securities are prohibited to, directly or indirectly, in any manner use or disclose the Inside Information to any other person knowing or should know that such person will exploit such information for trading the securities for his/her own or other's interest.
6. The Chief Executive Officer, Chief Financial Officer or any other authorized person is responsible for investor relation including domestic and international shareholders, investors and analysts.
7. The company secretary or the authorized person is responsible for the notification and promotion of the refraining from usage of Inside Information at least 1 month prior through the channels specified by the Company, such as email or any other communication which allows the stakeholders to promptly and fairly receive the information.
8. The directors and the Executives must notify any purchase and sale of their own securities within the period specified by the law, as well as report the holding of securities to the Board of Directors. The company secretary shall prepare a summary of the alteration of securities holding of the directors and Executives for the Board of Directors every quarter. This is to prevent the directors and the Executives to use the Inside Information in a manner of conflict of interest.

Punishment

Directors, the Executives, financial advisors, legal advisors, employees or workers who abused acts or omits to act or with gross negligence as specified by the Confidentiality of information, Protection of information and Insider trading policy which causes damage to the company whether valuation or not. It shall be deem to commit an offence under disciplinary action and shall be punished as specified by the Company's regulations.

Closing

Confidentiality of information, Protection of information and Insider trading Policy's Validity

This Confidentiality of information, Protection of information and Insider trading Policy shall be effective on 8 November 2019 and will last until the issuance of the new Confidentiality of information, Protection of information and Insider trading Policy as duly approved by the Board of Directors.