

Price-Sensitive Information Disclosure Policy

Business Online Public Company Limited (“The Company”) has managed in compliance with the Principle of Good Corporate Governance of the Stock Exchange of Thailand (“SET”) by adhering to good governance and the highest standard of business integrity. To ensure that all investors have equal access to price-sensitive information, the Company then establishes the policy on non-public price sensitive information disclosure (“Inside information” or “Non-Public price sensitive information”). The policy consists of 6 following categories.

Section 1. Definition

- 1.1 “The SEC Board” refers to The Securities and Exchange Commission, Thailand.
- 1.2 “Securities” refer to shares (common and preferred), debentures, stock options, derivatives, warrants, and other financial instruments which can be traded in the financial markets.
- 1.3 “Trading of Securities” includes purchasing, selling, transferring, or receiving a transfer of any legal benefits related to securities including exercise the right to buy shares or exercise the right under the warrants to purchase shares or debentures, and the obligation in a security futures contract.
- 1.4 “Price-Sensitive Information” refers to any material information that would be likely to have a significant effect on the security prices and values, for example, dividend payment declaration, increasing or decreasing capital, an introduction of a significant new product, significant development in resource, technology and market, or significant discovery of natural resource, as well as significant changes in accounting policies.
- 1.5 “Non-Public Price Sensitive Information” refers to any material information which is likely to have a significant influence on security prices and which has not been released to general public.
- 1.6 “Material, Non-Public Information” refers to inside information which has not been made public yet due to inconclusiveness or uncertainty.
- 1.7 “Executives” refer to the top four executives determined by the Capital Market Supervisory Board.
- 1.8 “Designated persons” refer to the following authorized persons who can access inside information of the Company.
 - 1) Directors and executives
 - 2) All executives who perceive or have access to inside information
 - 3) All employees who perceive or have access to inside information
 - 4) Any individuals who perceive or have access to inside information

Section 2. Duties and Responsibilities

- 2.1 The Board of the Directors is responsible for regulating the policy to ensure that the designated persons shall comply with the rules and guidelines concerning the disclosure of price-sensitive information policy.
- 2.2 The Company secretary is the key person to implement this policy as well as prepare for a list of designated persons and notify such persons when their names are added/deleted from the list, conduct a follow-up on the effectiveness of policy implementation, and clarify and interpret of inquiry as well as perform annual policy review which should be presented to the Board of Directors for approval in any changes.
- 2.3 The designated persons are responsible for ensuring that themselves and their related persons have strictly complied with Securities and Exchange Act B.E. 2535 (1992).

Section 3. Inside Information Disclosure

- 3.1 The Company shall deliver disclosure of inside information through SET PORTAL as prescribed by the Stock Exchange of Thailand as soon as possible in order to ensure that all investors have equal access to released information.
- 3.2 The Company may enable inside information disclosure on its own website after information has been released via SET PORTAL. Disclosure on the Company's website is subject to follow the guide on disclosure of price-sensitive information, the Securities and Exchange Commission.
- 3.3 The Company has defined that the Chairman of the Executive or one or several executives are appointed to act on behalf of the Company in providing answers to the questions about inside information that has been made public.

Section 4. Execution of Material, Non-Public Information

- 4.1 In case the Company has inside information which has not been released to the public due to inconclusive or uncertainty, the Company shall promptly disclose such information according to section 3 after having conclusion or certain result.
- 4.2 In the event that the internal information that has not yet been disclosed is required to disclose to designated person, but it has not yet disclosed to the Stock Exchange, the Company must ensure that recipients will maintain the confidentiality of the information.
- 4.3 The Company requires compliance with the principle of "SET's guidelines regarding price-sensitive information disclosures" to maintain confidentiality of inside information that has not been made public yet.

- 4.4 In case the Company takes risk upon the leakage of inside information prior to the confirmation of disclosure, the Company secretary must present to the Board of Directors to consider disclosing the following basic information about that situation to the Stock Exchange of Thailand.
- 1) Give as much details as possible
 - 2) Explain reasons for not giving complete fact
 - 3) Be loyal to disclose details of information as a first priority
- 4.5 If inside information is leak or unintentionally disclosed, the Company must perform the following actions.
- 1) Present the Board of Directors to consider prompt disclosure of information in accordance with section 3
 - 2) Review or check the process of providing information to specific group of people to detect the cause of information leakage

Section 5. General Provision

- 5.1 If there are any inquiries concerning this policy or there is uncertainty associated the information disclosure and trading circumstances, please consult the Company secretary.
- 5.2 All designated persons and related persons must study and understand the laws, guidelines or policy in relation to price-sensitive information as follows.
- 1) The rules governing prohibition of the use of inside information concerning the trading of securities in accordance with Security and Exchange Act B.E. 2535
 - 2) Guideline for handling confidential, market-sensitive information prescribed by Capital Market Supervisory Board
 - 3) Guidelines for market-sensitive information disclosure and consideration of actions in a way that does not take advantage of others in compliance with the SEC Notification No. Por Sor. (Wor) 5/2561
 - 4) Corporate governance policy

This policy was approved by the Board of Directors No. 5/2018 on November 8, 2018 with effect from November 9, 2018 onwards.

- Banyong Limprayoonwong -
(Banyong Limprayoonwong)
Chairman of the Board of Directors
Business Online Public Company Limited