



Microlending Public Company Limited

Policy on Insider Information Management

Internal Data Usage Policy

Policy on Insider Information Management

Microlending Public Company Limited (“the Company”) recognizes the importance of managing its insider information to prevent the exploitation of undisclosed company information that could impact the trading price of the company’s securities when listed on the Stock Exchange of Thailand in the future. As such, the Company has established a policy and procedures for managing insider information among directors, executives, and employees, as follows

1. Directors, executives, and employees of the company must keep the company’s confidential and insider information, within their responsibilities, from being disclosed to others, including unrelated company personnel.
2. The company must prevent the use of insider information by restricting access to information that has not been publicly disclosed. Only those who are relevant and

necessary should be aware of this information. The person responsible for insider information must strictly instruct those involved to comply.

3. Directors, executives, and employees of the company must not disclose or exploit the company's confidential and/or insider information for their own benefit or for the benefit of others, either directly or indirectly, regardless of whether they receive any compensation.
4. The company has designated individuals or departments responsible for disclosing the company's information to the public, ensuring the information's accuracy and completeness, and complying with legal disclosure requirements.
5. The company must oversee those involved with insider information, such as financial advisors, legal advisors, and auditors, as well as employees engaged in handling undisclosed and ongoing negotiation information. This includes any information that may impact the price or value of the company's securities or affect the company's business interests. These individuals must sign a confidentiality agreement until the information is disclosed to the Stock Exchange of Thailand and the Securities and Exchange Commission.
6. Directors, executives, and employees of the company have a duty to protect and preserve the company's insider information and must not exploit insider information, even after they have resigned or ceased their employment with the company.
7. Directors and executives are required to report their securities holdings and any changes in their securities holdings in accordance with Section 59 of the Securities and Exchange Act B.E. 2535 (1992) within 3 business days from the date of purchase, sale, transfer, or receipt of transfer of securities or derivatives contracts, by reporting through the electronic system at www.sec.or.th to the Securities and Exchange Commission. In addition, trading of the company's securities is prohibited for 1 month before the financial statements are disclosed to the public. This requirement extends to spouses or cohabitants as husband and wife, and minor children of directors and executives, as well as legal entities in which directors, executives, spouses or cohabitants as husband and wife, and minor children of directors and executives collectively hold more than 30% of the total voting rights of the company.

8. Directors, executives, and employees of the company must not trade or receive transfers of the company's securities by using the company's confidential and/or insider information, or engage in other legal acts using the company's confidential and/or insider information in a manner that would take advantage of outsiders. This requirement extends to spouses and minor children of directors, executives, and employees of the company. Anyone who violates these regulations will be considered to have committed a serious offense, and the company will take legal action.
9. The company requires that directors and executives who have knowledge of material insider information that affects the price or value of securities must refrain from trading the company's securities for one month before the financial statements or such insider information is disclosed to the public. They are also prohibited from disclosing this material information to others. During the 30 days before the announcement of performance results, the company secretary will notify directors, executives, and departments with insider information not to disclose this information to outsiders or individuals without related duties. They should wait at least 24 hours after the information is disclosed to the public before buying or selling the company's shares. In the case where the disclosure of the information is not widely known or is very complex, they should wait up to 48 hours after the information has been disclosed to the public before buying or selling the company's shares. Additionally, these individuals and those associated with the insider information are prohibited from disclosing this information to others.
10. The company must educate directors and executives about their duty to prepare and disclose reports on their own securities holdings, as well as those of their spouses and minor children, to the SEC in accordance with Section 59 and the penalty provisions of the Securities and Exchange Act B.E. 2535 (including subsequent amendments).

The company considers any violation of the insider information policy, including unauthorized disclosure of information that results in damage to the company, to be a disciplinary and/or legal offense. The punishment will be determined based on the intent of the action and the severity of the offense.
