

**Policy on the Use of Inside Information  
and Security of Computer and Information Systems**

**Pruksa Holding Public Company Limited**

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Pruksa Holding Public Company Limited (Company) manages business in accordance with the Stock Exchange of Thailand's practice guidelines on corporate governance and places importance on the use of inside information to ensure compliance with the principle of good governance, adhering to the principle of good corporate governance, integrity and honesty in business operations, and to ensure that investors in the Company's securities obtain reliable information in a fair and timely manner. The Company has therefore formulated a policy on the use of the Company's inside information with details as follows:

**1. Policy on confidentiality, storage and use of inside information**

Personnel at all levels of the organization are obligated to be aware of information security procedures to protect confidential information and comply with the information security procedures in order to prevent a disclosure of such information.

Confidential information means non-public information or information that in case of being disclosed to the public or the competitor will cause serious impact on the Company. This includes all the information that the partners and customers have provided the Company.

(1) The Company has determined the classification of information and confidentiality procedures, with important documents and confidential information being handled by a specific method that is assigned to each level and each type or category of information. This information may be classified in accordance with its importance, i.e., open information, restricted information, confidential information, secret information. The common use of inside information must be within the framework of the user's assigned duty and responsibility only.

(2) The Company must keep and treat customer information and trade information with confidentiality, not disclosing customer secrets to the Company's employees and unrelated outsiders; unless the disclosure is required by law for the purpose of litigation or approved by the Board of Directors.

(3) In hiring a person who used to work with a trading competitor or the government, the Company must search and study non-disclosure agreements the person had prior made with

trading competitors or the government and must not do anything to have the person breach the agreement with the trading competitor or the government, which may lead to litigation.

(4) A disclosure of confidential information to the public must be made with an approval from the Chairman of the Executive Board and Group Chief Executive Officer. The Chairman of the Executive Board and Group Chief Executive Officer may answer questions himself in case of very important information or assign responsible persons to provide information to the public as the Company has certain staff members to disseminate information to the public, with responsibility on investors relations and communication with the projects' investment units and coordination with the owners of information.

(5) The Company's personnel must not give answers or comments to any outsider, unless they have a duty or are assigned to answer questions. In other respects, they have to decline giving answers or comments in a polite manner.

The Company has a policy and procedures to treat its personnel at all levels of the organization, including directors, executives, staff, employees, or related persons, in the use of the Company's inside information to serve their purposes as follows:

(1) To provide knowledge to the directors, executives, including persons holding accounting or finance positions, persons responsible for operations, external auditors, employees, spouses and minor children of the said persons, about the duty of the directors, executives, including persons holding accounting or finance positions, persons responsible for operations, external auditors, employees, spouses and minor children of the said persons to report their holding of the Company's securities, and the penalties under the Securities and Exchange Act B.E. 2535 (as amended), the Stock Exchange of Thailand's requirements, and any other related criteria.

(2) The Company has required the directors, executives including persons holding accounting or finance positions, persons responsible for operations, external auditors, employees, spouses and minor children of the said persons to report on changes in their securities holding to the Office of Securities and Exchange (SEC Office) under Section 59 of the Securities and Exchange Act B.E. 2535 (as amended) and send a copy thereof to the Company on the date of the delivery of the report to the SEC Office every time.

(3) In order to enhance confidence among the shareholders, investors, and all related parties, the Company has established a measure related to the use of inside information by the Company's personnel, including directors, executives, as well as persons holding accounting or

finance positions, persons responsible for operations, external auditors, employees, spouses and minor children of the said persons. This measure aims to achieve equality and fairness in the use of the Company's inside information, which will enhance confidence among the shareholders, investors, and all related parties. The Company has therefore prohibited all the Company's above-mentioned personnel, including the family members of all the said personnel who have been informed of the Company's inside information that is a material fact that has an effect on the change of securities prices and has not been disclosed to the public, from trading securities or advising others to buy, sell, offer to buy or offer to sell the Company's shares, either by themselves or through brokers, regardless of what the benefit thereof is for their own or for other persons.

Besides, the Company prohibits the above-mentioned personnel of the Company and their family members from disclosing a material fact that has an effect on the change of securities prices and has not been disclosed to the public, to others to commit such act for their own benefits.

(4) The Company has informed the directors, executives, staff and employees or related persons that the executives who have been informed of the inside information that is a material fact that has an effect on the change of securities prices must exercise caution in trading the Company's securities within the period of 15 days before and 1 day after the date for the financial statement or the inside information to be disclosed to the public.

(5) The Company has informed the persons who are related to inside information that they must not disclose the information to others until the Stock Exchange of Thailand has been notified of the information.

## **2. Security of computer and information systems**

To properly comply with the policy, the Company has established measures to protect computer and information systems as follows:

(1) To restrict access to non-public information to only executives at the highest level as may be possible and disclose the information to the Company's employees on a need-to-know basis only and inform the employees that the information is confidential and the use thereof is restricted.

(2) A proper workplace security system is put in place to prevent unauthorized access and use of information files and classified documents.

(3) The owner of non-public information must ensure that related persons strictly comply with security procedures.

(4) The Company will have a policy on the use of computer and information systems and improve the systems on a continued basis to keep abreast of changes in laws and regulations of the regulating agencies, as well as technological changes, such as social media, and the development and change within the Company.

(5) The Company has control systems in accordance with international standards, such as requirements for the use of user names and passwords in accessing the Company's systems according to the roles and duties in using the systems and the scopes of operations linking the powers of approval, in line with the persons' duties in the Company.

### 3. Penalties

In case of a violation of the procedures, the Company will take disciplinary action as appropriate, such as verbal warning, written warning, pay cut, work suspension, employment termination, and legal action in case of legal offenses.

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Approved by the Audit Committee

Approved by the Board of Directors

Signed

Signed

(Dr. Piyasvasti Amranand)

(Dr. Pisit Leehtam)

Chairman of the Audit Committee

Chairman of the Board of Directors and Independent Director

9 May 2016

11 May 2016

**Note:** The English translation of the Policy on the Use of Inside Information and Security of Computer and Information Systems is for the purpose of understanding by foreigners; only the Thai version of the texts is legally binding.