Insider Trading Policy

Primo Service Solutions Public Company Limited

(Approved by the Board of Directors at Meeting No. 1/2022 on 26 July 2022)

PRIMO SERVICE SOLUTIONS PUBLIC COMPANY LIMITED

496 Moo 9 Sukhumvit 107 Road, Samrong Nuea,

Muang Samut Prakarn District, Samut Prakarn 10270

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Insider Trading Policy

Primo Service Solutions Public Company Limited **(the "Company")** has established policies and procedures to monitor and supervise its directors, executives, staff, and employees, as well as those of its subsidiaries, regarding the use of confidential and/or inside information of the Company and its subsidiaries that has not yet been disclosed to the public. This includes prohibiting the disclosure or exploitation of such information for personal benefit or the benefit of others, whether directly or indirectly, and regardless of whether any compensation is received. Furthermore, they are strictly prohibited from trading the Company's securities using inside information. The Company has established guidelines to prevent the use of inside information as follows:

1. The Company shall educate its directors and executives regarding their duty to report holdings of the Company's securities and derivatives by themselves, their spouses or cohabiting partners, and their minor children. This reporting requirement also extends to any legal entity in which the directors, executives, their spouses or cohabiting partners, and/or their minor children hold an aggregate shareholding exceeding 30 percent of the total voting rights of such entity, provided that this collective shareholding represents the largest proportion of shares in that entity. Such reports must be submitted to the Securities and Exchange Commission in accordance with Section 59 and the penalties under Section 275 of the Securities and Exchange Act B.E. 2535 (including any amendments thereto) **(the "Securities and Exchange Act")**, as well as the reporting of the acquisition or disposition of the Company's securities under Section 246 and the penalties under Section 298 of the Securities and Exchange Act.

2. Directors and executives of the Company are required to prepare and submit a report on the holdings of the Company's securities and derivatives by themselves, their spouses or cohabiting partners, and their minor children. This reporting requirement also extends to any legal entity in which the directors, executives, their spouses or cohabiting partners, and/or their minor children hold an aggregate shareholding exceeding 30 percent of the total voting rights of such entity, provided that this collective shareholding represents the largest proportion of shares in that entity. The report must be prepared using the prescribed securities holding report form and submitted to the Company Secretary prior to every submission to the Securities and Exchange Commission. Such reports must be prepared and submitted within 30 days from the date of appointment to the position of director and/or executive, and upon every subsequent change, or the changes in securities holdings must be reported within the period prescribed by law. Furthermore, the Company Secretary is required to summarize the reports on securities holdings and changes thereof for presentation to the Board of Directors' meeting for acknowledgment on a quarterly basis.

3. Directors and executives, including persons holding executive positions in accounting or finance lines at the department manager level or higher or equivalent, and relevant operators including persons presumed to know or possess inside information under the Securities and Exchange Act who have become aware of material inside information that affects changes in the price or value of securities must suspend the trading, offering to buy or sell, or inducing others to buy or sell, or offer to buy or sell the Company's securities, whether directly or indirectly, during the period prior to the dissemination of financial statements or information regarding the financial position and status of the Company until the Company has disclosed such information to the public. This restriction applies throughout the non-disclosure period of inside information that has not yet been disclosed to the public (the "Embargo Period"), which means a period of 1 month prior to and until the date of the announcement of the Company's quarterly and annual financial performance.

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In this regard, the Company will notify directors and executives in writing to refrain from tradingthe Company's securities at least 1 month prior to the public disclosure, and they should wait at least 24 hours after the information has been disclosed to the public. Furthermore, they are prohibited from disclosing such material information to other persons. In the event of any violation of the aforementioned regulations, the Company will consider it a disciplinary offense under the work rules and regulations of the Company and/or its subsidiaries, and penalties will be considered on a case-by-case basis, ranging from verbal warning, written warning, probation, up to termination of employment.

4. Directors, executives, and employees of the Company and its subsidiaries, as well as former directors, executives, and employees who have resigned, are strictly prohibited from disclosing inside information or trade secrets of the Company and its subsidiaries, as well as confidential information of their business partners that they have acquired in the course of performing their duties, to any third parties. This prohibition applies even if such disclosure does not cause any damage to the Company, its subsidiaries, or their business partners.

5. Directors, executives, and employees of the Company and its subsidiaries, as well as former directors, executives, and employees, are duty-bound to maintain the confidentiality of confidential information and/or inside information of the Company and its subsidiaries. They are also obligated to use the inside information of the Company and its subsidiaries solely for the business benefit of the Company and its subsidiaries. In this regard, directors, executives, and employees of the Company and its subsidiaries are strictly prohibited from exploiting the confidential information and/or inside information of the Company and its subsidiaries for the benefit of any other companies in which they serve as shareholders, directors, executives, staff, or employees.

Effective from 26 July 2022, onwards.

-Signature-

(**Mr. Marote Vananan**)

Chairman of the Board
Primo Service Solutions Public Company Limited

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