



## **Policy on the Use of Inside Information**

**PRIMO SERVICE SOLUTIONS PUBLIC COMPANY LIMITED**

496 Moo 9 Sukhumvit 107 Road, Samrong Nuea,

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### **Policy on the Use of Inside Information**

Primo Service Solutions Public Company Limited (the "Company") has established this Policy on the Use of Inside Information to ensure appropriate supervision and control over the use of confidential and/or inside information by directors, executives, employees, and staff of the Company and its subsidiaries.

Directors, executives, employees, and staff shall neither disclose nor use confidential and/or inside information that has not yet been disclosed to the public for their own benefit or for the benefit of others, whether directly or indirectly, regardless of whether any consideration or benefit is received. They are also strictly prohibited from trading the Company's securities based on inside information.

To prevent the misuse of inside information, the Company has established the following guidelines:

#### **1. Reporting of Securities Holdings**

The Company shall provide directors and executives with knowledge and guidance regarding their legal obligations to report their holdings of the Company's securities and derivatives, including those held by their spouses or persons living together as spouses, minor children, and juristic persons in which such directors or executives, together with their spouses or persons living together as spouses and minor children, collectively hold more than 30 percent of the total voting rights and constitute the largest shareholder group.

Such reporting shall be made to the Securities and Exchange Commission ("SEC") in accordance with Section 59 and the penalties prescribed under Section 275 of the Securities and Exchange Act B.E. 2535 (1992), as amended. Directors and executives shall also comply with the reporting requirements concerning the acquisition or disposal of the Company's securities pursuant to Section 246 and the penalties prescribed under Section 298 of the Securities and Exchange Act.

#### **2. Internal Reporting Requirements**

Directors and executives shall prepare and submit reports on their securities holdings and derivatives, including those of their spouses or persons living together as spouses, minor children, and relevant juristic persons as prescribed by law, using the Company's prescribed reporting forms. Such reports shall first be submitted to the Company Secretary before being filed with the SEC. The initial report shall be submitted within thirty (30) days from the date of appointment as a director and/or executive. Thereafter, any changes in securities holdings shall be reported within the timeframe prescribed by applicable laws and regulations.

The Company Secretary shall summarize reports on securities holdings and any changes thereto and present them to the Board of Directors for acknowledgement on a quarterly basis.

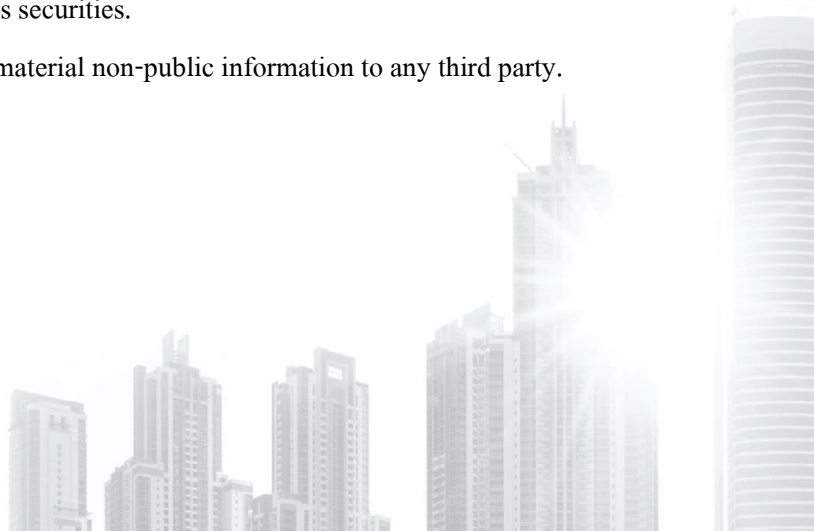
### 3. Blackout Period and Prohibition on Insider Trading

Directors, executives, executives responsible for accounting or finance at the department manager level or above (or equivalent), relevant personnel, and any persons presumed under the Securities and Exchange Act to possess inside information who become aware of material non-public information that may affect the price or value of the Company's securities shall refrain from purchasing, selling, offering to purchase, offering to sell, or inducing any other person to trade the Company's securities, whether directly or indirectly, during the period prior to the disclosure of the Company's financial statements or other material information relating to its financial position or operating results until such information has been publicly disclosed.

This restriction shall apply throughout the Embargo Period, which means the period commencing one (1) month prior to the announcement of the Company's quarterly and annual financial results and continuing until the information has been publicly disclosed.

The Company shall notify directors and executives in writing to refrain from trading the Company's securities at least one (1) month before the scheduled public disclosure of such information. Directors and executives should also wait at least twenty-four (24) hours after the public disclosure before conducting any transaction involving the Company's securities.

Furthermore, no person shall disclose any material non-public information to any third party.



Any violation of this Policy shall constitute a disciplinary offence under the Company's and/or its subsidiaries' work regulations and may result in disciplinary actions as deemed appropriate, including verbal warning, written warning, probation, or termination of employment.

#### 4. Confidentiality of Inside Information

Directors, executives, employees, and staff of the Company and its subsidiaries, as well as former directors, executives, employees, and staff whose employment or service has ended, are strictly prohibited from disclosing any confidential information or inside information of the Company and its subsidiaries, including confidential information of the Company's business partners obtained in the course of their duties, to any external party, regardless of whether such disclosure may or may not cause damage to the Company, its subsidiaries, or its business partners.

#### 5. Proper Use of Inside Information

Directors, executives, employees, and staff of the Company and its subsidiaries, as well as former directors, executives, employees, and staff, shall maintain the confidentiality of the Company's and its subsidiaries' confidential and/or inside information and shall use such information solely for the legitimate business purposes of the Company and its subsidiaries.

Directors, executives, employees, and staff are strictly prohibited from using the Company's and its subsidiaries' confidential and/or inside information for the benefit of any other company or organization in which they serve as shareholders, directors, executives, employees, or staff, or for their own personal benefit or the benefit of any third party.

This Policy shall become effective on 26 July 2022.

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(Mr. Maroj Varanan)

Chairman of the Board of Directors

Primo Service Solutions Public Company Limited

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