

Prevent Misuse of Insider Information Policy

Meb Corporation Public Company Limited

Prevent Misuse of Insider Information Policy

Meb Corporation Public Company Limited (the “Company”) places great importance on preventing the misuse of insider information. The Company has a policy that prohibits directors, executives, and employees from disclosing or using any information that could impact the Company’s stock price, which has not yet been publicly disclosed (“**insider information**”). This also includes but is not limited to any business information that could harm the Company or put it at a disadvantage, such as performance results, commercial data, or any other confidential business information (“**trade secret**”). Specifically, the policy forbids the use of insider information to gain any advantage, either for oneself or others, regardless of whether financial gain is achieved. Additionally, it prohibits the buying or selling of the Company’s securities or entering into forward contracts related to the Company’s securities based on inside information. This restriction applies regardless of whether compensation is received. Furthermore, directors, executives, and employees must not buy, sell, or engage in derivative contracts related to the Company’s securities using insider information. To enforce this policy, the Company has established the following preventive measures

1. Reporting Changes in Stocks Holdings

- (1) The Company will educate its directors and executives about their duty to report changes in their holdings of the Company’s securities and any derivative contracts referencing the Company’s securities. This reporting obligation also extends to the securities and derivative contracts of the director’s or executive’s spouse or domestic partner, their minor children. And any juristic entity in which the director, executive, spouse, domestic partner, or minor children collectively hold more than 30% of the total voting rights, provided that their combined shareholding is the largest among all shareholders of that entity (collectively referred to as “Related Persons”).
- (2) The Company’s directors and executives are required to report any changes in their holdings of the Company’s securities and derivative contracts referencing the Company’s securities, including those of their Related Persons, to the Securities and Exchange Commission (SEC) in compliance with the notification issued under Section 59 of the Securities and Exchange Act B.E. 2535 (1992) (as amended) (“Securities Act”). A copy of the report must also be submitted to the Company Secretary on the same day it is filed with the SEC.

For directors and executives, the report must be submitted within seven (7) business days from the date of purchase, sale, transfer, or receipt of securities or derivative contracts, in full compliance with the applicable regulations.

- (a) The Company shall submit the names of its directors and executives into the database system for listing directors and executives of securities-issuing companies, in

accordance with the procedures prescribed by the Securities and Exchange Commission (SEC) under the relevant SEC notifications regarding the format and method for reporting or updating information on company directors and executives.

- (b) Any individual required to report (i.e., directors, executives, and related persons) who purchases, sells, transfers, or receives securities or derivative contracts before their name appears in the Company's directors and executives database (as per item (a)) must still comply with reporting requirements.

For any other transactions beyond those specified above, the report must be submitted within three (3) business days from the date of purchase, sale, transfer, or receipt of securities or derivative contracts.

2. Prohibition on the Use of Insider Information

- (1) Directors, executives, and employees of the Company who become aware of or possess insider information of the Company and its subsidiaries must refrain from buying or selling the Company's securities, entering into forward contracts referencing the price or securities of the Company, or using such information for personal gain or for the benefit of others in any way before such insider information is disclosed to the public, except as permitted under Section 242 of the Securities and Exchange Act. Furthermore, such individuals are prohibited from disclosing insider information to others until it has been publicly announced.

Additionally, the aforementioned persons, including related persons, are prohibited from buying or selling the Company's securities or entering into forward contracts referencing the price or securities of the Company for at least 30 days before the Company's financial statements are publicly disclosed and within 24 hours after the Company's financial statements have been made public (Blackout Period).

- (2) Directors, executives, and employees of the Company are prohibited from using insider information or business secrets of the Company and its subsidiaries, as well as confidential business information of business partners that they have come to know due to their position or status, for the purpose of buying, selling, offering to buy, offering to sell, or soliciting any person to buy, sell, offer to buy, or offer to sell the Company's securities, or entering into forward contracts referencing the price or securities of the Company, whether directly or indirectly. This prohibition applies regardless of whether the use of such information causes harm to the Company, its subsidiaries, or business partners, and regardless of whether the act is done for personal benefit or for the benefit of others. Additionally, such individuals must not disclose or exploit the information for the purpose of inducing any person to take or refrain from taking any action that would result in personal gain or benefit to others, whether or not they receive compensation in return.

3. Safeguarding Insider Information

- (1) Directors, executives, and employees of the Company who become aware of or possess insider information of the Company and its subsidiaries must store such information with due care and security to prevent its leakage to external parties.
- (2) Directors, executives, and employees of the Company must not disclose insider information of the Company and its subsidiaries to any individuals who are not responsible for handling such information, in order to prevent its misuse for personal or third-party benefit.
- (3) The Company must establish a system for safeguarding and preventing the misuse of insider information to ensure that such information does not leak and is not used for trading securities, either for personal gain or for others.
- (4) The disclosure of insider information to the public, including any communication related to insider information, must be approved by the Managing Director, Chief Operating Officer, Chief Financial Officer, or an authorized representative.
- (5) The Company shall ensure that confidentiality agreements are in place with consultants or other service providers before allowing them access to transactions involving insider information.

4. Penalties

- (1) Any violation of this policy shall be considered a disciplinary offense under the Company's work regulations. Disciplinary actions may include verbal warnings, written warnings, probation, or termination of employment, depending on the severity of the violation.
- (2) Individuals who fail to comply with the duty to report changes in securities holdings under Section 59 of the Securities and Exchange Act to the Securities and Exchange Commission shall also be subject to penalties under Section 275 of the Securities and Exchange Act.

Additionally, the Company will review its insider information protection policy periodically to ensure its alignment with prevailing circumstances.

Furthermore, the Company's subsidiaries shall adopt this policy with appropriate modifications as applicable.

This Prevent Misuse of Insider information policy shall be effective from 18 April 2022, onward.