

Insider Information Management Policy **Thai Life Insurance Public Company Limited**

Thai Life Insurance Public Company Limited (“**the Company**”) recognizes the importance and strives to perform business in accordance with the law. In the operation of the Company, there may be cases where directors, executives, employees of the Company shall consider and acknowledge of any insider information that could affect the price of securities or decisions to invest in securities of the Company, and such information has not been disclosed to the public yet. Therefore, the use of insider information is important as well as insider information should be properly managed in order to avoid misappropriation or misuse, which is not only illegal but may also affect the Company's reputation.

In this regard, the Board of Directors has established the Insider Information Management Policy in order to create an understanding, communicating, and a clear guideline for the insider information management for the Company’s directors, executives and employees to act responsibly. In addition, the objective of this policy aims for the Company’s directors and executives to comply with the laws in relation to reporting the change of securities holding. As a result, the principles of such matters have been incorporated into this policy.

Definition

“**Insider Information**” means any information has not been disclosed to the public which are significant for the change of securities’ price or value. Example of insider information are financial statements information, the Company’s performance, information regarding major shareholders and controlling persons etc.

“**Securities**” means shares or convertible securities.

“**Convertible Securities**” means securities with one of the following terms and conditions:

- (1) Converting the debt payment into the delivery of listed company shares;
- (2) Granting securities holders the right to purchase listed company shares;
- (3) Granting the right to receive returns based on the price or return of listed company shares.

“**Derivatives**” means derivatives contract under the derivatives’ law having all the following characteristics:

- (1) There is a requirement for the counterparty to receive returns based on the price or return of listed company shares;
- (2) The contract provides trading on derivatives exchange that have been granted a license under the derivatives’ law.

“**Impact to Securities Prices**” means any material impact caused to the Company’s securities in the manner of rising, lowering, stabilizing, or maintaining of Company’s securities prices.

“**Executives**” means the executives in accordance with the definition of the relevant notifications of the Securities and Exchange Commission.

Principles and Practice Guidelines

1. The Company's directors, executives, and employees who know or possess insider information or work in a position or department that is responsible for insider information or have access to such information, shall comply with the following guidelines:
 - 1.1 Preserving insider information with the care that any reasonable person would do in order to avoid leak of insider information;
 - 1.2 Do not disclose insider information to non-operational personnel or third parties whether directly or indirectly, and by any means to prevent misuse of insider information.

As a result, it may affect the price of the Company's securities or the investment decision in the Company's securities.
2. The Company's directors, executives, and employees who know or possess insider information or work in a position or department that is responsible for insider information or have access to such information, are prohibited from disclosing insider information to third parties or irrelevant persons as well as prohibited from subscribing, purchasing or selling the Company's securities or entering into derivatives contract related to the Company's securities whether for themselves or another person during the period before disclosing such insider information to public and/or before disclosing quarterly and annual financial statements to the Stock Exchange of Thailand at least one (1) month and has a waiting period at least 24 hours after the disclosure before trading the Company's securities.
3. The sharing of insider information shall only be within the scope of the duties and responsibilities assigned. The public disclosure of Insider Information, including any information communications related to insider information, shall be approved by the Director and Chief Executive Officer only. Such assignment may be specific to a particular case and/or only certain types of information or all kinds of information and shall disclose to the extent necessary with caution and in accordance with relevant laws.
4. The Company's directors and executives are responsible for the preparation, disclosure and submission of the report on the change of securities and derivatives contract of (a) themselves (b) Spouse or cohabiting couple (c) Underage children and (d) A juristic person in which themselves, spouse or cohabiting couple and underage children which hold more than 30% of the total voting right and the aggregate shareholding is the largest proportion in such juristic person according to Section 59 of the Securities and Exchange Act B.E. 2535 (including the amendment) and the relevant notifications of the Securities and Exchange Commission Office ("SEC"). The report shall be prepared in accordance with the form and submitted to the SEC within the period specified in the following, unless the holding or changing in securities and derivatives contract holding is exempted by the SEC's relevant notifications.
 - 4.1 Transactions with a value less than THB 3 million can choose the submission period between:
 - 4.1.1 Reporting within 3 business days from the transaction date
 - 4.1.2 Reporting within 3 business days when one of the following conditions or timeframes is met, whichever occurs first, as follows:
 - (1) when the total value of the combined transactions reaches THB 3 million;
 - (2) upon the expiry of 6 months from the first transaction's execution date.
 - 4.2 Transactions with a value of THB 3 million and above must be reported within 3 business days from the transaction date.
 - 4.3 In the case of spouses or cohabiting couples are directors and/or executives of the Company. In case anyone of them reported to the SEC, it shall be considered that the report has been prepared and submitted completely.

4.4 In case that the directors and executives are not yet listed in the SEC's directors and executives database, whilst the Company has notified the names of directors and executives in accordance with the methods prescribed by the SEC. The report must be made within 7 business days from the transaction date.

In this regard, when a report is made in accordance with clause 4, a copy of the report shall be submitted to the Company Secretary, in order for the Company Secretary to prepare the record of changes and summarize the number of securities and derivatives.

Policy review and update

In the event of any change in laws, regulations, policies or guidelines that affects this Policy, or if this policy becomes inappropriate or insufficient for business operation, the Company Secretary Office shall propose the amendments as it may deem appropriate to the Board of Directors for consideration and approval.

Penalty

With regards to violation, infringement, omission, or non-compliance with a policy that constitutes an illegal act, offenders may be prosecuted as required by laws. If the Company or another person is harmed as a result of such an offense, the Company may pursue additional legal action. In addition, the Company shall consider disciplinary action against the Company's management and employees according to the Company's regulations.

(The policy shall be effective as of 14 August 2024 onwards.)