Document	Insider Trading Prevention Policy
Document No.	PROUD/LC/POLICY007
Effective Date	1 January 2021

Insider Trading Prevention Policy

Proud Real Estate Public Company Limited and its subsidiaries (the "Company") recognize the importance of preventing the misuse of the Company's inside information that may affect the price of its securities and that has not yet been disclosed to shareholders, investors, or the general public. The Company therefore manages such information appropriately to prevent information leakage, its improper use, and any unfair advantage over others. Such conduct not only violates the law but also damages the Company's reputation.

Purpose

The purpose of the Insider Trading Prevention Policy is to provide guidelines for directors, executives, and employees at all levels who know or possess inside information in the course of their duties. Such persons shall safeguard the Company's inside information that may affect the price of its securities or information whose disclosure may cause damage to the Company or place the Company at a disadvantage. The Company considers such information confidential and material. Directors, executives, and employees shall not disclose confidential information and/or inside information that has not yet been disclosed to the public or use such information for their own benefit or for the benefit of others, whether directly or indirectly and whether or not any consideration is received. They shall not trade in the Company's securities by using inside information.

Definition

Inside Information (Internal Data) means information created or maintained by the organization that is material to its operations, decision-making, or strategy. Such information may include financial information, customer information, employee information, production information, or marketing information. Inside information is regarded as confidential information or information that should not be disclosed to external parties in order to protect the organization's competitive advantage and privacy.

Guidelines for the Prevention of Insider Trading

1. The Company shall provide directors and executives with information on their duty to report their own securities holdings, the securities holdings of their spouses or persons who live together as husband and wife and their minor children, and the securities holdings of any juristic person in which the directors or executives, their spouses or persons who live together as husband and wife, or their minor children hold more than 30 percent of the total voting rights, to the Office of the Securities and Exchange Commission in accordance with Section 59 and the penalty provisions under Section 275 of the Securities and Exchange Act B.E. 2535 (1992) (as amended). This duty also covers the reporting of any acquisition or disposal of securities in accordance with Section 246 and the penalty provisions under Section 298 of the Securities and Exchange Act B.E. 2535

(1992) (as amended).

2. Directors and executives of the Company, together with their spouses or persons who live together as husband and wife and their minor children, and any juristic person in which any of the foregoing persons holds more than 30 percent of the total voting rights, shall prepare and disclose reports on securities holdings and changes in securities holdings to the Office of the Securities and Exchange Commission in accordance with the Securities and Exchange Act B.E. 2535 (1992) (as amended). If a director or senior executive intends to purchase or sell the Company's shares, such director or senior executive shall notify the Company Secretary at least one day before the transaction. The Company shall subsequently report the transaction to the Board of Directors.
3. Directors, executives, employees, and workers of the Company, including persons presumed to know or possess inside information under the Securities and Exchange Act B.E. 2535 (1992) (as amended), who become aware of material inside information that affects or may affect the price of the Company's securities, shall refrain from purchasing or selling the Company's securities during the period of one month before the relevant financial statements or such inside information are disclosed to the public and for 24 hours after such disclosure. Persons who have access to such information shall not disclose it to any other person until the information has been reported to the Stock Exchange of Thailand.
4. The Company prohibits directors, executives, and employees from disclosing the Company's inside information. They shall not use their positions to disclose or use the Company's inside information or material information relating to the Company's operations that they obtain in the course of their duties and that has not yet been disclosed to the public.
5. The Company prohibits directors, executives, employees, and other relevant persons from using such information for their own benefit or for the benefit of others, except where disclosure is required by law.
6. The Company shall control and prevent external persons from accessing the Company's information and determine information access rights for employees at each level according to their authority, duties, and responsibilities.

Securities Trading Blackout Measures

Directors, executives, persons who hold management positions in the Company's accounting or finance functions at the level of department manager or equivalent, employees in departments that have access to inside information, and the spouses or persons who live together as husband and wife and the minor children of such persons, if they become aware of inside information, shall not purchase or sell the Company's securities or the securities of another listed company to which such inside information relates. This restriction shall apply during the period of one month before the disclosure of the quarterly or annual financial statements and for 24 hours after such disclosure.

In addition, if any director, executive, employee in a department that has access to inside information, spouse or person who lives together as husband and wife, or minor child of such person becomes aware of the Company's inside information or the inside information of another listed company, that person shall not purchase or sell the securities of the relevant company until 24 hours have elapsed after such information has been fully disclosed to the public.

Policy Review

The Company shall regularly review and revise the Insider Trading Prevention Policy to ensure compliance with applicable laws and to respond to changes in circumstances. Such review and revision shall promote positive outcomes, support the effective implementation of the Policy, prevent information breaches, and ensure appropriate protection and security for the Company's inside information. Any revision to the Policy shall support the Company's operations in accordance with sustainable standards and the principles of good corporate governance.

Penalties

Any director, executive, or employee who violates the Insider Trading Prevention Policy, neglects any duty required under the Policy, fails to perform any action required under the Policy, intentionally fails to comply with the Policy, or uses inside information for his or her own benefit or for the benefit of others, whether directly or indirectly and whether or not any consideration is received, shall be subject to disciplinary action in accordance with the Company's regulations or to penalties under applicable law. The appropriate penalty shall be determined based on the person's intent and the seriousness of the violation.

Issued on 1 January 2021

(Mr. Pumipat Sinacharoen)
Chief Executive Officer
Proud Real Estate Public Company Limited