

Directors and Executives' Securities Trading Policy

BlueVenture Group Public Company Limited ("Company") adheres to transparent and equitable treatment towards all shareholders, in line with good corporate governance principles. The Company places importance on preventing the misuse of the Company's internal information, in accordance with practices that prohibit directors, executives, employees, and staff from revealing or seeking personal or third-party benefits from confidential or undisclosed information to the public, whether directly or indirectly. To achieve this intention, the Company has defined the directors', executives', and employees' securities trading policy, applicable to all directors, executives, and employees of the company. Additionally, parts of this policy extend to spouses (or those living as husband and wife) and children who have not reached legal age of the aforementioned individuals, as well as any legal entity where such individuals, spouses, or children who have not reached legal age hold together more than 30% of the total voting rights and have the highest proportion of shares in that legal entity.

Objectives

1. To establish the criteria and guidelines related to the securities trading of the Company's directors and executives.
2. To support the Company's directors and executives in complying with the Securities and Exchange Act, B.E. 2535 (1992) (including its amendments) ("Securities Act"), concerning securities trading using inside information, and announcements from the Office of Securities and Exchange Commission ("SEC Office") regarding the reporting of securities held by the listed company's directors and executives.
3. To build confidence among shareholders and investors in the Company's securities.

Scope of Enforcement

This policy covers the trading of the Company's securities and the securities of companies within the group listed in the Stock Exchange of Thailand (collectively referred to as "Group of Company's Securities").

1. This policy applies to the Company's directors, executives, auditors, and employees. Furthermore, parts of this policy cover spouses and children who have not reached the legal age of the aforementioned individuals.
2. This policy encompasses confidentiality, internal information retention, and the trading of the Company's securities.

Duties and Responsibilities

- (1) The Company's Board of Directors assigns the managing director to supervise and strictly oversee the securities trading policy of the directors, executives, and employees.
- (2) Directors and executives must comply with the securities trading policy of the directors, executives, and employees with rigor, including informing their spouses and children who have not reached the legal age.

- (3) Executives are responsible for ensuring that subordinates within the unit recognize the importance and understand the securities trading policy of the directors, executives, and employees, as well as strictly comply with the policy.
- (4) The Company Secretary is responsible for implementing this version of the securities trading policy of the directors, executives, and employees, as well as monitoring its effectiveness and addressing any inquiries.

Prohibition on Trading Securities Using Inside Information

Directors, executives, and all employees must comply with the prohibition on trading securities using inside information, as stipulated in the Securities Act.

“In trading securities listed in the Stock Exchange of Thailand, or securities traded at the Securities Trading Center, no person shall buy or sell, or offer to buy or sell, or induce others to buy or sell, or offer to buy or sell, any securities listed in the Stock Exchange of Thailand, or securities traded at the Securities Trading Center, either directly or indirectly, in a manner that is likely to take advantage of others by utilizing significant facts affecting price changes of the securities that have not been disclosed to the public, and which they knew in such position or status. Regardless of whether such actions are for personal benefit, or others, or disclosing such facts to enable others to take such actions, where they receive compensation in return.”

Policies and Guidelines for Practice

1. Policy on Trading Group of Company’s Securities for Specified Persons

“**Specified Persons**” refers to persons in positions or roles privy to the Company's inside information, including spouses or those living together as husband and wife, minor children of such persons, and any legal entity where the person, spouse, or those living together as husband and wife, or minor children hold more than 30% of the total voting rights and have the highest shareholding proportion in that legal entity. This includes:

- (1) Directors
- (2) Senior Executives
- (3) Executives and employees in departments with access to the Company's inside information, such as Investor Relations Department, Accounting and Finance Department, Joint Venture and Business Development, Company Secretary, Internal Audit Department, Legal Department, Compliance Department, and Executive Office.
- (4) All executives and employees who participate in meetings with the Company's Board of Directors and/or subcommittees.
- (5) Any other persons that the supervisory agency and related parties jointly deem as "Specified Persons" in the Company.

The Company Secretary is responsible for maintaining a register of Specified Persons and notifying them when their names are added or removed from the register.

2. Reporting Changes in Securities Holdings

- (1) The first 4 directors and executives of the Company (as per section 1) are responsible for preparing the report on changes in securities holdings according to form 59-2 of the Securities and Exchange Commission (SEC), and must submit it to the SEC from the date of purchase, sale, transfer or receipt of transfer of securities in accordance with the Securities Act, subject to the following conditions:
 - In case the value of the transaction exceeds 3 million baht, it must be reported within 3 working days.
 - In case the value of the transaction does not exceed 3 million baht, it can be reported within 3 working days or reported within 3 working days when the total transaction reaches 3 million baht or when 6 months have passed since the first transaction date, even if the total transaction does not reach 3 million baht.
 - If a director, executive, spouse or minor child of the director or executive buys or sells securities, both must report it. Except for the reporting of directors or executives who are spouses or cohabiting couples who are directors or executives in the same listed company to reduce duplication of reporting, if any one report is submitted to the SEC, it is considered complete.
- (2) Specified Persons other than the 4 four directors and executives (as per section 1) must prepare the report on changes in securities holdings for the SEC and submit it to the Company Secretary within 3 working days from the date of purchase, sale, transfer, or receipt of securities.

3. Blackout Period

- (1) Persons designated by the Company are prohibited from trading the securities of the group of company within a 30-day (thirty-day) period before the disclosure of the quarterly and annual financial statements, and during any other periods temporarily specified by the Company.
- (2) In special circumstances, persons designated by the Company may sell securities of the group of company during the blackout period if they are in a situation such as facing severe financial difficulties or having to comply with various legal requirements, or being under a court order. They must prepare a record specifying the reasons and submit it for approval to:
 - (a) The Chairman of the Company's Board of Directors (in case the seller is a director or Company Secretary)
 - (b) The Chairman of the Audit Committee (in case the seller is the Chairman of the Company's Board of Directors)
 - (c) The Chief Executive Officer (in case the seller is a person designated by the Company, other than a director or Company Secretary)

In this case, the applicant must trade the securities within 3 working days (three working days) from the date of receiving written approval, and provide a copy of the record to the Company Secretary.

4. Advance Notice before Securities Trading

Any person designated by the Company who wishes to trade the securities of the group of company must notify the Company's Board of Directors at least 1 day (one day) prior to trading.

5. Securities Transactions that Do Not Qualify as Securities Trading

This policy does not apply in the case of acquiring or receiving an offer to purchase securities for business takeover (Tender Offer).

6. Policy Review

The Company Secretary must regularly review this policy and propose it to the Company's Board of Directors for approval if there are any changes.

7. Policy Violations

Any director, executive, or employee who violates this policy may be subject to disciplinary action up to and including termination of employment, and may be liable under both criminal and civil law according to the Securities Act.

Directors, executives, and all employees should read and understand this policy, along with other company policies and manuals, namely the governance policy, compliance principles, good corporate governance, code of ethic, and code of conduct of directors, executives, and employees.

If any director or executive has any doubts about this policy or is unsure whether significant internal information should be disclosed to the public, or under what circumstances securities can be traded, please contact the Company Secretary Department through the appropriate channels.

1. **Postal Mail:**

BlueVenture Group Public Company Limited

No. 100/22, Sathorn Nakorn Tower, 15th Floor, North Sathorn Road, Silom, Bangrak, Bangkok 10500

2. **By Telephone 02-011-8600**