

## **Disclosure Policy**

BlueVenture Group Public Company Limited ("Company") places importance on conducting business in accordance with good corporate governance principles and to ensure that the disclosure of the Company's information is accurate, complete, transparent, and fair, in compliance with laws and regulations of the supervisory agency. Therefore, an information disclosure policy is established as a guideline for the Board of Directors, management, and employees according to the principles of good corporate governance.

### **Scope of Enforcement**

1. Information communication must be disclosed completely, correctly, timely, consistently, and equally to both shareholders and all stakeholders, including those who need financial information and the general public, without biased treatment of information, whether positive or negative.
2. The Company's disclosure of information will encompass every means of communication, such as annual reports, annual performance reports, news, press releases, letters to shareholders, the Company's website, group meetings, one-on-one meetings, or speaking via telephone with analysts and investors, providing information through websites, or other media, granting interviews with the mass media, and making news announcements.
3. Recognizing the necessity to keep business secrets related to significant business information and operational strategies, in line with the criteria and regulations for disclosing information of the Stock Exchange of Thailand, and the Securities and Exchange Commission.

### **Definitions**

#### **"Insider Information"**

refers to information that has not been disclosed to the public, which is essential to the changes in price or value of the securities. This includes information from the Company or insiders that is likely to have a significant effect on the price or value of the securities, or investment decisions. Such information also includes details about listed companies, major shareholders, those with control power, or key management of the listed company, and is clear enough that the general investor is likely to use it to make investment decisions.

#### **"Important Information"**

refers to information related to the Company's business operations. If this information is improperly disclosed, it may significantly affect the Company's ability to conduct business or the securities' price, and investment decisions, whether it pertains to financial data, investments, or trade secrets, such as:

- (1) Financial Statements: This includes balance sheets, profit and loss statements, cash flow statements, statements of changes in shareholders' equity, notes to financial statements, and significant changes in accounting policies.
- (2) Information about Mergers and Acquisitions: This includes acquiring or selling significant associate/subsidiary companies, which may affect or change the business structure of the Company.

- (3) Information about acquiring or selling significant securities or investment projects.
- (4) Information about paying or not paying dividends, or changes in the Company's dividend payment policy.
- (5) Information about changes in major shareholders, person with control power, or key executives.
- (6) Information about the Company's significant legal disputes.
- (7) Information about providing or terminating significant company services.
- (8) Information about the Company's policies or strategies in conducting business.
- (9) Forecast information about the condition, direction of business operations, including future performance, specifically information about profits or losses.
- (10) Other information about the company that might affect the securities' price, or influence investment decisions.

### **Guidelines for Disclosing Information**

#### **1. Principles for Disclosing Information**

- (1) Information disclosed must be accurate, complete, clear, easy to understand, fair, and timely.
- (2) Comply with the rules and regulations relating to the proper and complete disclosure of information.
- (3) All stakeholders must have equal rights to access and easily obtain the Company's information.
- (4) Any information or news that may significantly affect changes in the price or value of the Company's securities or that is deemed important to investors in making investment decisions or that affects the rights of the Company's shareholders must be disclosed to the public as soon as possible through the Stock Exchange of Thailand in accordance with the rules and regulations for disclosing information. In cases where the Company cannot disclose such information generally, relevant persons must ensure that this information is restricted to those necessary.
- (5) Clarify the facts to the public in case of rumors or leaks, according to the regulations of the Stock Exchange of Thailand.

#### **2. Internal Data Management**

- (1) Define or restrict the persons who can access internal data.
- (2) Do not use internal data for personal benefit or the benefit of others.
- (3) Do not disclose information that is not yet finalized or is under consideration, but there is a risk that the internal data will leak.
- (4) Before being able to confirm the facts and related impacts, it must be possible to disclose preliminary information about the situation according to the rules of the supervisory agency.
- (5) Supervise directors, executives, and employees to comply with the policies regarding the use of internal data.

### **3. Authority to Disclose Information**

#### Disclosure through the Stock Exchange of Thailand

- Chief Executive Officers, Chief Financial Officer, and/or assigned persons.

#### Disclosure through the Company's website and other channels:

- Chief Executive Officers, Chief Financial Officer, and persons assigned to disclose information on specific matters, such as investor relations, etc.

### **4. Disclosure Schedule**

- (1) Disclosure of information according to the financial period to the supervisory agency within the time specified by law.
- (2) Disclosure of information as per event when there are significant events necessary for investment decisions in the Company's securities based on the urgency and importance of information, and within the time prescribed by law.
- (3) Disclosure of information through the Company's website when there are events or information that may be beneficial to investors and the public.
- (4) Direct disclosure of information to investors and securities analysts after the disclosure of financial statements, or participation in meetings at events organized by other agencies.

### **5. Channels for Information Disclosure**

- (1) Reporting to the Stock Exchange of Thailand.
- (2) Disclosure through the Company's website: <https://www.blueventuregroup.co.th>.
- (3) Documents presented by the Company to analysts, fund managers, investors, and various printed media, such as annual reports, etc.

### **6. Exceptions in Information Disclosure**

- (1) Prohibition of disclosing information that is a business secret, or information that if disclosed, may cause the Company to lose benefits and competitive abilities.
- (2) Prohibition of disclosing information that has not been concluded or is under negotiation, which is still uncertain.
- (3) Prohibition of disclosing information about operational results that may impact the price of the Company's securities, including any other information that is prohibited from being disclosed according to announcements from the Office of the Securities and Exchange Commission and/or the Stock Exchange of Thailand, in the period before disclosing financial statements to the Stock Exchange of Thailand, starting from the end of the quarter until the Company has successfully reported the information to the Stock Exchange of Thailand.