

Policy for Treatment of Insider Information

BlueVenture Public Company Limited (“The Company”) and the subsidiaries prioritize the use of Insider information in accordance with good corporate governance principles, adhering to the principles of good governance, honesty, and integrity in conducting business. This is to ensure that investors in the Company's securities receive reliable information equally and in a timely manner. Therefore, the Company has established regulations for the supervision of the use of Insider information and regulations for the trading of securities by directors, executives, and employees in compliance with securities and stock exchange law, emphasizing transparency in business operations.

Definition

“**Insider Information**” refers to information that has not yet been disclosed to the public or information used exclusively for the Company's purposes, and not for individual use, including information that the Company temporarily withholds, such as information from financial statements not yet submitted to the Stock Exchange of Thailand, dividend payments, business amalgamations, significant business contracts, etc.

Policies and Guidelines

The Company has a policy that prohibits directors, executives, and employees, from using insider information for personal gain. In addition to confidentiality measures by limiting the number of personnel who can access the information and requiring directors and executives to comply with the criteria set by The Office of the Securities and Exchange Commission, the Company has established appropriate conduct in code of ethic and code of conduct, including disciplinary actions and penalty outlined clearly in the Company's regulations. This includes having each employee sign a contract to comply with the Company's data security policy to prevent employees from using the Company's information for personal gain or unauthorized purposes. Furthermore, the Company has policies and methods to monitor the use of insider information for personal gain, as well as for securities trading purposes as follows:

- (1) Directors, executives, and employees, including spouses, parents, children, siblings, and other external individuals who have been informed of important internal information regarding the Company's securities trading, are prohibited from trading such securities at least 1 month before the disclosure of such important internal information and 24 hours after such disclosure. The responsible unit will periodically inform the related parties of such timing in advance.
- (2) Directors, executives, and employees, including spouses, parents, children, siblings, and other external individuals who have been informed of important internal information, are prohibited from using such information for personal gain or for the benefit of others, whether in paper or computerized format.

- (3) To ensure proper use of internal information, the Company has personnel responsible for supervising various tasks and cautioning employees to be careful in storing and preserving various data. If it is necessary to disclose any information, specific individuals will be designated solely for the purpose of disclosing such information.
- (4) The Company communicates and ensures compliance with the reporting requirements of changes in shareholdings by directors, executives, and auditors, as stipulated in Section 59 of the relevant announcement, and the penalties prescribed in Section 275 of the Securities and Exchange Act, B.E. 2535 (1992) (and its amendment). The Company is also responsible for reporting the acquisition or disposition of securities in accordance with Section 246 of the relevant announcement and the penalties prescribed in Section 298 of the Securities and Exchange Act, B.E. 2535 (1992) (and its amendment).
- (5) Directors, executives, and auditors have a responsibility to prepare and submit reports on changes in shareholdings, as well as reports on the acquisition or disposition of securities in accordance with the law. The Company will prepare a report on the shareholdings of directors and executives and submit it to the Board of Directors on a quarterly basis.

Penalties

Penalties are set for disciplinary action in case of violation using insider information for personal gain, ranging from warnings to wage cuts, temporary suspension without pay, or termination. The punishment will be considered based on the intent of the action and the severity of the offense. Moreover, those who violate by using insider information for personal gain, including related persons, may also be subject to legal punishment.