



## Translation

### The Use of Internal Information

#### (The 1<sup>st</sup> Amendment of 2018)

TRC Construction Public Company Limited has an effective Internal Information Management Policy to reduce risk in data breach or misuse of information. The main objective is to comply with The Securities and Exchange Act (No. 5) 2016, effective on 12 December 2016 with amendment related to control of using internal information. The 7/2018 Board of Directors Meeting dated 12 November 2018 has resolved to approve a regulation for the use of internal information, the 1<sup>st</sup> Amendment of 2018. This new regulation replaces the previous regulation approved in 2005. It is become part of company's regulation of TRC Public Company Limited and Sahakarn Wisavakorn Company Limited. The details of the regulations are as follows;

#### Definition of Internal Information

Internal information, which is not to be disclosed to anyone prior to announcement to public investor, means information that is not announced to public and has significant impact to the changes in the value of company's share. This information consists of company or internal individual information which may have significant impact of the change in share's price or share's value or decision to invest. The information also includes information related to the company, major shareholder, controller or executive management of the company and the information that is explicitly for investor to use to make decision on the investment.

#### Regulation

1. Company will comply with the SET's regulation in disclosing significant information which may have impact on investor's decision to invest in the shares via SET prior to disclosing to analyst or external parties as well as prior to investors through any channel. CEO, executive management and company secretary shall be responsible for communicating such information on behalf of the company.
2. Director, executive, employees of all TRC groups of company and external parties who work for and possesses the company's internal information must use internal information with caution and keep the information confidential. This is to prevent the breach of information. They also must comply with "Procedure for operation control and Information Technology Security Policy" consisting of Information



Security Policy, Segregation of duty, Access control to data center and Loss protection. The internal information must not be disclosed or misused directly or indirectly for personal benefit.

In cases where external parties are involved in special projects dealing with information undisclosed to the public and during the negotiation stage, such projects shall be regarded as inside information as it may affect company's share price. These external parties must sign a confidentiality agreement with the company before receiving the internal information.

3. Prohibiting director, executive and employees of the company who use the information that has not been disclosed and have or may have an impact on the price of the securities of the Company, which they have learned by their positions or statuses to purchase, sell, offer to buy or sell, persuade others to buy or sell, offer to buy or sell shares or other securities of the Company (if any), whether directly or indirectly, in a manner that is likely to cause damage to the Company whether directly or indirectly. And whether such action would benefit themselves or others or would not benefit themselves or others.

Moreover, director, management, employees including their spouse or cohabiting couple and minor child that received inside information shall not trade the Company's security within 1 month before and 24 hours after the quarterly and yearly financial statements are disclosed to the public.

In addition to the relevant persons that specified in the preceding paragraph who has received the inside information of the company and the other listed company must not trade in 24 hours after the company and listed company has disclosed to the public.

4. Director, executive, auditor, temporary executive, plan preparer and plan administrator shall report the changes in the company's securities holdings and Derivative Warrants to SEC following to section 59 of The Securities and Exchange Act, (No. 5) 2016 by electronic within 3 business days from the transaction date and inform the Company Secretary to report the changes in the company's securities holdings and Derivative Warrants to the board of directors.
5. Violation under "The Use of Internal Information" shall be considered as a serious offense



Notification of the Regulation on The Use of Internal Information (The 1<sup>st</sup> Amendment of 2018) is effective on 15 November 2018 onwards until further notice.

= Signature =

(Mr. Pasit Leesakul)

Chief Executive Officer

\* Note: The Securities and Exchange Act, 1992 section 59 (Amended 2016) and Section 275 is as follows:

“**SECTION 59** A director, manager, person who holds management position as specified in the notification of the SEC Office and an auditor of the securities issuing company under Section 32 or Section 33 shall have the duty to prepare and disclose reports to the SEC Office on each person holding securities and derivatives and the changes to such holding as well as the holding and changes to the holding of their spouse, cohabiting couple and minor children in accordance with the rules and procedures as specified in the notification of the SEC Office. 4

The securities and derivatives under the first paragraph are:

- (1) Securities of the securities issuing companies under Section 32 or Section 33, as specified in the notification of the SEC Office;
- (2) any securities which are issued by a third party who grants the securities holders the right to purchase, sell, acquire, or dispose of the securities under (1) or to receive returns that are dependent upon the price or returns of the securities under (1);
- (3) Derivatives under the law on derivatives which requires delivery or derives its value from the price or returns of the securities under (1) or (2).

The reporting under the first paragraph shall include the holding of securities and derivatives, and the change to such holding, by a juristic person whose shares exceeding thirty percent of the total voting rights are held by the persons under the first paragraph, including the spouse or cohabiting couple, and minor children of such persons.

The provisions under the first paragraph shall apply to the interim executive, the plan preparer, the plan administrator and the interim plan administrator under the law on bankruptcy, of the securities issuing companies under Section 32 or Section 33, mutatis mutandis, and in cases where such persons are a juristic person, the duty under the first paragraph shall also apply to the director, manager and executive of such juristic person, as specified in the notification of the SEC Office.”

“**SECTION 275** Any person who has the duty to prepare and disclose the reports under Section 59 contravenes or fails to comply with Section 59 or the rules or procedures as prescribed thereunder shall be liable to a fine not exceeding five hundred thousand baht and a further fine not exceeding ten thousand baht for everyday during which the contravention continues.”