



**Policy on Use of the Company's Internal Information, Information and Cybersecurity,
and Hierarchy of the Company's Information
S Hotels and Resorts Public Company Limited**

Policy on Use of the Company's Internal Information, Information and Cybersecurity, and Hierarchy of the Company's Information

S Hotels and Resorts Public Company Limited (the “**Company**”) upholds the guidelines in adherence to the principles of good corporate governance issued by the Stock Exchange of Thailand (the “**SET**”) and the Securities and Exchange Commission (the “**SEC Office**”) in its management. Endorsing good governance and honesty in business operations, the Company places importance on supervision of the use of its internal information to ensure compliance with the principles of corporate governance and that investors of the Company's securities receive reliable information on a prompt and equal basis. As such, the Company has implemented the Policy on Use of the Company's Internal Information, the details of which are as follows:

Guideline for the Safeguard and Use of the Company's Internal Information

Personnel at all levels of the organisation shall strictly comply with the Code of Conduct of the Company and shall have a duty to acknowledge and conform with the information security procedure, in order to protect confidential information and to prevent disclosure and misuse of confidential information.

“**Internal Information**” means

1. Information which has not been disclosed to the public, which is material to the change in the securities price or value;
2. Information whose disclosure to the public is prohibited;
3. Information which is under preparation for disclosure to the public, but has yet to be officially disclosed.

1. Guideline for the Safeguard of Internal Information

1) Determining the Hierarchy of Information Confidentiality

Internal Information is a trade secret. As such, it needs to be protected against disclosure to outsiders. It can also be classified into types in accordance with the hierarchy of confidentiality: Disclosable information, Undisclosed information, Confidential information, and Highly confidential information. Sharing of Internal Information shall be done only within the scope of assigned duties and responsibilities.

2) Giving Information to Outsiders

Disclosure of information of confidential nature to the public shall be subject to the approval of the Chief Executive Officer, whereby the Chief Executive Officer may have to handle questions and disclosure by him or herself in a case of highly material information, or to have an assigned person be responsible for information disclosure to the public. The Company has officers in charge of disclosure of information to the public, who are responsible for investor relations and coordination with investment-related agencies in projects. Such officers shall carry out coordination with internal units which own the information.

3) Making Comments to Outsiders

Personnel of the Company shall not answer any question or make a comment to any outsider unless he or she has a duty or has been assigned to do so. Otherwise, personnel of the Company shall politely refuse to comment on such matters.

2. Guideline for the Use of Internal Information

The Company shall inform its Board of Directors and executives, executives in the line of accounting and finance on the level of, or equivalent to, a department manager of the Company, the Company's auditors, as well as preparers, administrators, and interim administrators of plans under the law on bankruptcy, of the duties in preparing, disclosing, and submitting reports on changes to the securities and derivatives holding by him or herself, the spouse or a person cohabiting in a manner similar to a spouse, and child who has yet to come of age to the SEC Office, under the Securities and Exchange Act B.E. 2535 (1992) (as amended) (the "**Securities Act**"), relevant notifications of the Securities and Exchange Commission, and relevant notifications of the Capital Market Supervisory Board, including the relevant legal penalty provisions.

The Company's Board of Directors and executives, its executives in the line of accounting and finance on the level of, or equivalent to, a department manager of the Company, auditors, as well as preparers, administrators, and interim administrators of plans under the law on bankruptcy, has a duty to prepare, disclose, and submit to the Company Secretary prior to submitting to the SEC Office reports on changes to the securities and derivatives holding by him or herself, the spouse or a person cohabiting in a manner similar to a spouse, and child who has yet to come of age, including legal

persons under the provision of the Securities Act, relevant notifications of the Securities and Exchange Commission, and relevant notifications of the Capital Market Supervisory Board. Such reports shall be prepared according to the form and submitted to the SEC Office within the period as follows:

2.1. Seven (7) days after the date on which the purchase, sale, transfer, or acceptance of transfer of securities or derivatives in a case where the person with the reporting duty is the Company's director or executive and shall comply to all of the criteria as follows:

- a) The Company shall produce a list of its directors and executives to import into the Issuing Company's Director and Executive Database, under the method specified by the SEC Office in its notification on forms and procedures for filing or changing information on issuing company directors and executives;
- b) A person with the duty to report has purchased, sold, transferred, or accepted a transfer of securities or derivatives prior to the date on which his or her name is included in the Issuing Company's Director and Executive Database under a).

2.2. Within three (3) business days from the date on which the purchase, sale, transfer, or acceptance of transfer of securities or derivatives is made, in cases other than in 2.1.

1) Use of Internal Information

The Company acknowledges the importance of and its responsibilities to its shareholders and stakeholders under the guideline on the principle of corporate governance. As such, to enhance the confidence of all shareholders, investors, and stakeholders, the Company has determined measures for the use of its Internal Information in order to achieve fairness and equality therein. The Company determines as a prohibition that no personnel at any level of the Company, as mentioned above, including any family member thereof, who has been aware of the Company's Internal Information and facts which have yet to be disclosed to the public, material to change in price or value of the Company's securities, shall use such information to (a) purchase or sell securities, whether for him or herself or a third party, unless it is permissible by the law; (b) disclose such Internal Information to another person, whether directly or indirectly, regardless of the means or whether he or she knows or should have known that the person receiving such

information may exploit it for sale or purchase of securities, whether for him or herself or a third party, unless it is carried out in a non-exploitative manner or in a manner in compliance with the notification of the SEC Office; or (c) persuade another person to purchase, sell, or offer to purchase or sell shares in the Company, whether by him or herself or through a broker, and regardless of such act being carried out for the benefit of him or herself or a third party.

In addition, the Company prohibits its personnel above, or his or her family member from disclosing a fact material to change in price or value of securities, which has yet to be disclosed to the public, to another person so that he or she can [conduct trading on securities with such knowledge], whereby the person making disclosure receives compensation in return.

The Company shall deem the trading of the Company's securities which exploits misuse of Internal Information as mentioned above is carried out for profit or to create an advantage for a particular party, which constitutes a legal and disciplinary offence. The Company has also determined additional policy on the use of Internal Information in which it requires that a director, executive, and executive in the line of accounting and finance on the level of, or equivalent to, a department manager of the Company, who has been informed of Internal Information material to change in price or value of securities, refrain from trading in the Company's securities during the period prior to the publication of the financial statement or information relating to the financial or other statuses of the Company, until the Company has disclosed such information to the public. The Company shall notify its Board of directors, executives, executives in the line of accounting and finance on the level of, or equivalent to, a department manager of the Company, and its auditors to refrain from trading in the Company's securities in writing at least thirty (30) days prior to the disclosure of such information, and to also wait for at least 24 hours after the disclosure to the public before starting to trade in the Company's securities again, during which period they shall not disclose such material information to another person.

In addition, directors, executives, and employees of the Company shall have a duty to comply strictly with the Company's Code of Conduct, the guideline for use of Internal Information under the Securities Act, and the Public Company Act B.E. 2535 (as amended), as well as other relevant regulations.

2) Information and Cybersecurity Measures

To ensure that compliance with the policy is in a neat and orderly fashion, the Company has implemented the following measures for information and cybersecurity:

- (1) Use of the Company's computers and information technology shall be subject to the Computer-Related Crimes Act and other relevant laws.
- (2) Access to information not disclosed to the public shall be limited, to the extent possible, to the Chief Executive Officer, Chief Financial Officer, Investor Relations Vice President, Company Secretary, and executives in the relevant lines of work. Such information may only be disclosed to an employee of the Company where and to the extent necessary, while it will also be made clear to the employee that such information is confidential and its use is limited.
- (3) Modification, reproduction, deletion, destruction, or disclosure of information in the Company's information system without its permission shall be prohibited.
- (4) There shall be a workplace security system to prevent access to and use of confidential files and documents.
- (5) A person's username and password shall be kept securely and shall not be shared, disseminated, distributed, or made known to another person.
- (6) The Company's email shall not be used to send to another person a message or image that is of a slanderous, defamatory, vulgar, sexually indecent, threatening, persecuting, or bothersome nature, or that is prohibited by the law.
- (7) The owner of information which has yet to be disclosed to the public shall explicitly instruct every relevant party to comply strictly with the security measures.

3) Punishment for Misuse of Internal Information

Any person using Internal Information for his or her personal gains shall be subject to disciplinary actions, ranging from giving a warning in writing, deduction of compensation, suspension without pay, to termination of employment. The severity of such action taken shall depend on the intention of such misuse and severity of the violation, and may also include legal actions by the relevant authority, as the case may be.

Announced on 3 May 2019

- Mr. Sompong Tantapart -

Chairman of the Board of Directors



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