



Policy code No. M10

Revision No. 01

Effective Date: 24 December 2021

Information Disclosure Policy

Principles and Reasons

North East Rubber Public Company Limited (“The Company”) places importance on management and conducting business in accordance with good corporate governance principles. Which recognizes the importance of disclosing material information accurately, promptly and in accordance with the rules set by various regulatory agencies. Therefore, the Board of Directors has established a policy and guidelines for information disclosure to be a guideline for the performance of company’s directors, executives and employees of the company as the following details.

Scope

This Information Disclosure Policy is used for the company’s directors, executives and employees of North East Rubber Public Company Limited and its subsidiaries only. By this policy applicable to the provision of information of the Company both financial and other information through channels. Such as providing written information, verbal information or via telephone, video conference, social media, internet or digital media, announcing information to investors or reporters as well as providing various information through channels provided by government agencies or other persons for the general public to be able to obtain information.

Definition

- “Company” means North East Rubber Public Company Limited and its subsidiaries.
- “Employees” means Employees of North East Rubber Public Company Limited and its subsidiaries, every person, every position, every type and every level of management.
- “Stakeholders” means Partners, customers, manufacturers, sellers, sub-contractors, financial institutions, shareholders, accounts payable, accounts receivable, investors and employees, etc.
- “Important/Inside Information” means Information that has not been released to the general public which is material to change or value of securities or investment decision as well as the information should be reasonably clear that general investors should use to make investment decisions. Important/Inside information that affects investors' decisions are as follows:
- Assets, liabilities, liquidity, financial status of the company



- Performance or forecast of the company's performance
- Business operations of the company
- Development or investment projects in the future
- Changing of Major Shareholders, Controlling Persons or Key Executives.

Providing Information

1. Dissemination of important information and company news must be clear, accurate, complete, transparent, timely, and provide reliable information that can clarify various information to stakeholders clearly, easily and quickly.

2. The distribution of important information and news must be fair to all parties by treating all parties equally. Consistently within the established operating framework and avoid any practices that may cause conflicts of interest.

3. Dissemination of important information and any news must ensure that it does not negatively affect the relationship between the customer and the company or harass confidential information of customers, shareholders and other stakeholders.

4. The act of communicating confidential internal information must comply with the Company's regulations specified in the Company's Code of Conduct.

5. Important information of the company that affects the price of the company's securities or it may affect investment decisions or affect the rights of shareholders. Can be opened only when the information has been officially published to the Stock Exchange of Thailand.

Communication

1. The Chief Executive Officer has the authority to inform news and important information of the company. As well as can assign the executives of each line to provide information related to that line through the Investor Relations Department or related departments.

2. Shareholders, investors or interested parties able to get information of the company or contact for additional information through the Company's website. Investor Relations Department and/or Company Secretary which is responsible for providing information or answering inquiries in the part that is general information. Moreover, be the center for coordinating with the staff or persons directly involved in answering or providing information.

Standards and Communication Styles

1. The Company will notify the Company's operating results to shareholders, investors and the general public. know from time to time continually Including other information through the media of the Stock Exchange of Thailand. and on the Company's website

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2. The company will deliver annual reports, financial statements and documents explaining the company's operating results to shareholders every year as information for the annual general meeting.

3. The company will disclose information presented at the annual general meeting and meeting documents on the company's website.

4. The Company requires directors, executives, and employees **to be careful in communicating** market sensitive information to analysts, investors, fund managers, mass media, or people who investing in the Company. In particular, the operating results and financial position during the period of 1 month prior to the official disclosure of the financial statements to the Stock Exchange of Thailand.

Examples of information that may affect the price of a security

- Profit or loss
- Income that has changed significantly from the previous period or fixed in the direction opposite to market conditions significantly
- Announcement of dividend payment or non-payment
- Changes in par value or stock dividends
- Capital increase or capital reduction
- New product launches
- Joint venture, merger or acquisition
- Change in control power or significant changes in the Board of Directors and management
- Buying or selling important assets
- Change of company objectives
- Significant changes in accounting policies
- Making a tender offer to purchase securities of other companies
- Major legal disputes

5. The Company requires the Chief Executive Officer to **prohibit the disclosure of information** related to the Company's performance. During the period of 7 days prior to the date on which the company will publish information to the Stock Exchange of Thailand. As well as no meeting policy to provide information, hold a group meeting or answer any inquiries related to the operating results to shareholders, investors, analysts, fund managers and mass media and to comply with the company's regulations. Moreover, analysts on a quarterly basis after the Company has disclosed information related to the Company's operating results to the Stock Exchange of Thailand. And will disclose the information presented at the meeting through the Company's website.

Inside Information Disclosure

The Company prohibits the disclosure of inside information to any person for the benefit of oneself or others. By setting guidelines for the Board of Directors, Executives and employees of the Company in the matter as follows:

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- a) Must maintain confidentiality and/or inside information of the Company
- b) Must not disclose confidential and/or internal information of the Company or seek benefits for oneself or for the benefit of any other person, whether directly or indirectly and whether or not it will be rewarded
- c) Must not trade, transfer or accept transfer of the Company's securities using secret and/or information within the company and/or enter into any other juristic acts with confidentiality and/or internal information of the Company which may cause damage to the Company either directly or indirectly.
- d) Board of Directors and Executives of the Company including the Company's auditor must report changes in securities holding as well as spouses and minor children to the Office of the Securities and Exchange Commission under Section 59 of the Securities and Exchange Act 1992. And acknowledge the penalties under the Securities and Exchange Act 1992 said to the company on the same day as reporting to the Office of the Securities and Exchange Commission, which is scheduled to be notified within 3 business days. Moreover, the Company's Secretary has been assigned to recommend and support the report to the Board of Directors and Executives who need assistance in carrying out various tasks, which must submit to the Company's Secretary and report to the Board of Directors' meeting for acknowledgment

In this regard, the directors, executives, employees of the company who are in the departments who have received inside information of the company should avoid or refrain from trading the company's securities during the period of 1 month before the official disclosure of financial statements to the Stock Exchange of Thailand and within 24 hours after the disclosure of such financial statements (Blackout Period). Related to the spouses and minor children of the Company's executive directors. If anyone violates such regulations, it will be considered a serious offence.

Review of data and information disclosure policy

The Company's data and information disclosure policy must be reviewed and regularly reviewed to be consistent correct according to the requirements and legal regulations including review for better practical results.

This Policy has been approved by the Board of Director's Meeting No. 9/2021 on 24 December 2021 to be effective from 24 December 2021 onwards.

-Mr. Chanitr Charnchainarong-
(Mr. Chanitr Charnchainarong)
Chairman of the Board of Director