



-Translated Version-

**Insider Information Management Policy**  
**Ubon Bio Ethanol Public Company Limited and Its Subsidiaries**

Ubon Bio Ethanol Public Company Limited and its subsidiaries (the “Company”) are committed to complying with all applicable laws and regulations relating to insider trading. The Company also places importance on the supervision of securities trading based on inside information in accordance with the principles of good corporate governance.

The Company has therefore established policies and measures to govern directors, executives, and employees regarding the use of the Company’s inside information that has not yet been disclosed to the public for personal gain, with details as follows:

**Definitions**

Company	Means	Ubon Bio Ethanol Public Company Limited and its subsidiaries.
Securities	Means	securities listed on domestic or foreign stock exchanges, including but not limited to treasury bills, bonds, bills, shares, debentures, investment units, warrants to purchase shares, warrants to purchase debentures, warrants to purchase investment units, derivatives relating to securities, and any other instruments as prescribed under the Securities and Exchange Act B.E. 2535 (1992) (as amended) (the “Securities and Exchange Act”) or by the Securities and Exchange Commission (“SEC”).
Inside Information	Means	information that has not yet been publicly disclosed and which is material to changes in the price or value of the Company’s securities

**Policy**

1. Directors, executives, and employees of the Company, as well as former directors, executives, and employees of the Company, are prohibited from disclosing inside information or confidential information of the Company, including confidential information of the Company’s business partners obtained through the performance of their duties, to any external party, regardless of whether such disclosure may cause damage to the Company or its business partners.



**บริษัท อูบอ ไบโ อีทานอล จำกัด (มหาชน)**  
**UBON BIO ETHANOL PUBLIC COMPANY LIMITED**

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2. Directors, executives, and employees of the Company, as well as former directors, executives, and employees of the Company, are responsible for maintaining the confidentiality of and/or safeguarding the inside information of the Company and shall use such information solely for the benefit of the Company's business operations. Directors, executives, and employees are strictly prohibited from using confidential and/or inside information of the Company for their own benefit, for the benefit of any other company in which they are shareholders, directors, executives, or employees, or for the benefit of any other person, whether directly or indirectly, and regardless of whether any consideration or compensation is received.

3. Directors, executives, and employees of the Company shall not purchase, sell, transfer, or accept the transfer of the Company's securities or derivatives contracts by using confidential and/or inside information of the Company, nor engage in any other transactions by using such information in a manner that may cause damage to the Company, whether directly or indirectly. This prohibition shall also apply to spouses or persons living together as spouses, as well as minor children of directors, executives, and employees of the Company.

4. Directors, executives, employees of the Company, and related persons shall comply with the guidelines regarding the prohibition on trading the Company's securities during the period before and after the disclosure of inside information (Blackout Period), as prescribed by the Company.

5. Directors, executives, employees of the Company, and persons holding the highest position in accounting and finance at the level of department manager or equivalent, including their spouses or persons living together as spouses, minor children, and juristic persons as prescribed under the Securities and Exchange Act B.E. 2535 (1992), notifications of the Office of the Securities and Exchange Commission ("SEC Office"), and notifications of the Capital Market Supervisory Board, who intend to conduct transactions involving the Company's securities, shall notify the Company Secretary at least one business day prior to such transaction.

6. Directors, executives, and employees of the Company are required to strictly comply with the Policy on the Use of Inside Information, including all applicable laws, regulations, and notifications issued under the Securities and Exchange Act B.E. 2535 (1992) (as amended), notifications of the SEC Office, the Public Limited Companies Act B.E. 2535 (1992) (as amended), and requirements of relevant regulatory authorities.

7. Directors, executives, and employees of the Company who fail to comply with this Policy shall be deemed to have violated the Company's Code of Conduct and shall be subject to disciplinary actions. In addition, such persons may also be subject to penalties prescribed by applicable laws if their actions constitute legal violations.

### **Guidelines on Prohibition of Trading the Company's Securities During Blackout Period**

1. Directors, executives, and employees of the Company, including executives in accounting or finance functions at the level of department manager or equivalent, as well as their spouses or persons living together as spouses and minor children who possess inside information, are prohibited from purchasing, selling, transferring, or accepting the transfer of the Company's securities or derivatives related to the Company's securities during the period of one month prior to the disclosure of the quarterly and annual financial statements and within 24 hours after such financial statements have been disclosed.

2. Directors, executives, and employees of the Company, including executives in accounting or finance functions at the level of department manager or equivalent, as well as their spouses or persons living together as spouses and minor children who possess undisclosed inside information that may affect the price of the Company's securities, are prohibited from trading the Company's securities until at least 24 hours have elapsed after such information has been fully disclosed to the public.

### **Reporting of Changes in Holdings of the Company's Securities and Derivatives Related to the Company's Securities**

1. Directors, executives, and employees, including executives in accounting or finance functions at the level of department manager or equivalent, as well as their spouses or persons living together as spouses, minor children, and juristic persons as prescribed under the Securities and Exchange Act B.E. 2535 (1992), notifications of the Office of the Securities and Exchange Commission ("SEC Office"), and notifications of the Capital Market Supervisory Board, are required to notify their intention to conduct transactions involving the Company's securities and to prepare, disclose, and submit reports on their securities holdings, including those of their spouses or persons living together as spouses, minor children, and related juristic persons, to the Company Secretary Department prior to submission to the SEC Office on every occasion.

2. Prior to conducting any transaction involving the Company's securities, directors, executives, and employees, including executives in accounting or finance functions at the level of department manager or equivalent, as well as their spouses or persons living together as spouses, minor children, and juristic persons as prescribed under the Securities and Exchange Act B.E. 2535 (1992), notifications of the SEC Office, and notifications of the Capital Market Supervisory Board, shall notify the Company Secretary Department of their intention to conduct such transaction at least one business day in advance via telephone, electronic mail, or any other communication method. The Company may also require the use of a notification form for trading the Company's securities.

### 3. Reporting Periods

In the case of directors or executives whose names appear in the directors and executives database system<sup>1</sup>:

- a) A report must be submitted for every transaction within 3 business days from the transaction date<sup>2</sup>, regardless of the transaction value.
- b) A report must also be submitted upon the occurrence of either of the following conditions<sup>3</sup>, whichever occurs first:
  - 1) When the aggregate value of purchase, sale, transfer, or acceptance of transfer transactions reaches THB 3 million or more; or
  - 2) Upon completion of a six-month period from the date of the first transaction.

In either case, the report must be submitted within 3 business days from the date the relevant condition or period is met.

In the case of directors or executives whose names do not yet appear in the directors and executives database system<sup>1</sup>, provided that the Company has already submitted their names for inclusion in such system:

- a) A report must be submitted for every transaction within 7 business days from the transaction date<sup>2</sup>, regardless of the transaction value.
- b) A report must also be submitted upon the occurrence of either of the following conditions<sup>3</sup>, whichever occurs first:
  - 1) When the aggregate value of purchase, sale, transfer, or acceptance of transfer transactions reaches THB 3 million or more; or
  - 2) Upon completion of a six-month period from the date of the first transaction.

In either case, the report must be submitted within 3 business days from the date the relevant condition or period is met.

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<sup>1</sup> Director and Executive Information System” means the information system for directors and executives in accordance with the Office’s notification regarding the forms and procedures for notifying or changing information of directors and executives of a company.

<sup>2</sup> Transaction” means the purchase, sale, transfer, or acceptance of transfer of securities or derivatives contracts.

<sup>3</sup> Aggregate Value” means the total value of all transactions involving the purchase, sale, transfer, or acceptance of transfer of securities or derivatives contracts conducted by oneself and related persons.

### Retention and Protection of Inside Information

Any disclosure of inside information to the public, including any communication relating to the Company's inside information, must be reviewed and approved only by the Chief Executive Officer and President, and/or the Deputy Managing Director – Accounting and Finance, and/or persons specifically authorized by them.

Reviewed and announced on 24 February 2026.

*-Signed-*

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(Mr. Palakorn Suwanrath)

Chairman of the Board of Directors

Ubon Bio Ethanol Public Company Limited