

Internal Information Disclosure Policy

Internal information refers to the information not yet made publicly available or the information intended not for individual use but for the sole use of the Company, including the information temporarily kept undisclosed such as financial information not yet submitted to the SET, dividend payment, merger, acquisition of a material commercial agreement, and the like.

Thai Reinsurance Public Company Limited and its subsidiaries have a policy to prohibit the directors, executives and employees from using internal information of the Company for personal advantage. Apart from the confidentiality measure through limitation of number of persons authorized to access information and requirement of the directors and executives to comply with the SEC's regulations, the Company has incorporated the best practices into the code of ethics and conduct, established the disciplinary rules, and imposed the disciplinary actions clearly in the Company's regulations. All employees also are required to sign the agreement on data security policy compliance to prevent them from using the Company's information for personal benefit or from using the information without permission. Moreover, the Company has established the policy and method for control of the use of internal information for personal gain and for securities trading, as follows:

1. The directors, executives, employees, each person's spouse, parents, children and siblings, and all other third parties who have received material non-public information of the Company are prohibited from trading in the Company's securities during the period of at least one month before a public disclosure of such information and 24 hours after the said disclosure. The responsible unit will give an advance warning of such trading prohibition to the relevant parties from time to time.
2. To control the use of its internal information, the Company has designated certain staff members to be responsible for specific issues and advises the operating staff to exercise due care to preserve confidentiality. If it is necessary to disseminate any information, a specific person shall be assigned to solely be in charge of such disclosure.
3. The Company communicates to all directors, executives and auditors to acknowledge and carry out the duty to report their securities holding to the SEC pursuant to Section 59 and the penal provisions in Section 275 of the Securities and Exchange Act B.E. 2535 (as amended) and to report an acquisition or disposition of their securities according to the SEC pursuant to Section 246 and the penal provisions in Section 298 of the Securities and Exchange Act B.E. 2535 (as amended).
4. The directors, executives and auditors have duty to prepare and submit a report on their securities holding and acquisition or disposition according to the regulations. The Company shall also prepare a report thereon for submission to the Board of Directors on a quarterly basis.

¹ Notification of the Office of the Securities and Exchange Commission No. SorChor. 38/2561 Re: Preparation of Report on Changes to the Securities and Derivatives Holding of directors, executives, auditors, plan preparers and plan administrator dated 16 July 2018.

² Notification of the Capital Market Supervisory Board No. TorChor. 28/2554 Re: Rules on Reporting of Acquisition or Disposition of Securities dated 12 September 2011.