



USE OF INSIDER INFORMATION POLICY
MILLENNIUM GROUP CORPORATION (ASIA) PUBLIC COMPANY LIMITED

Effective date: Jun 20, 2022
Approved by: The Board of Director's Meeting 1/2022

Use of Insider Information Policy

Millennium Group Corporation (Asia) Public Company Limited (the “Company”) conducts its business operations in accordance with the Good Corporate Governance Principles prescribed by the Stock Exchange of Thailand (“SET”) and the Securities and Exchange Commission (“SEC”). The Company places great importance on the proper management and use of insider information, in compliance with relevant laws and governance principles, and upholds integrity and transparency in all business conduct. To ensure that investors in the Company’s securities receive accurate, reliable, and timely information on an equal basis, the Company has established this Use of Insider Information Policy as follows:

1. Education and Awareness

The Company shall provide education and guidance to its directors, executives, and senior management in the accounting or finance functions at department-manager level or equivalent regarding their obligations to prepare and submit reports on changes in their securities and derivatives holdings, including those of their spouses, domestic partners, minor children, and juristic persons in which such persons collectively hold more than 30 percent of the total voting rights and such holding constitutes the largest proportion in that entity. Such reporting must comply with the Securities and Exchange Act B.E. 2535 (1992) (as amended), notifications of the SEC Office, and relevant penalty provisions under applicable laws.

2. Reporting of Securities and Derivatives Transactions

The Company requires all directors, executives, and senior management in the accounting or finance functions at department-manager level or equivalent to prepare and submit reports on any change in their securities or derivatives holdings, including those of their spouses, domestic partners, minor children, or related juristic persons meeting the criteria above, to the Company Secretary prior to submission to the SEC. Such reports shall be prepared in the prescribed form and submitted to the SEC within the following timeframes:

- 2.1 Within seven (7) business days from the date of purchase, sale, transfer, or acceptance of transfer of securities or derivatives, in the case where the reporting person is a director or executive of the Company and meets all of the following conditions:
 - (a) The Company has notified the list of directors and executives to be recorded in the SEC’s system of directors and executives of listed companies, in accordance with the SEC Office Notification concerning the form and procedures for reporting or changing directors’ and executives’ information; and
 - (b) The person conducted such transaction before his/her name was officially recorded in the SEC’s system mentioned in (a).
- 2.2 Within three (3) business days from the transaction date in any other case not covered by Clause 2.1.

3. Blackout Period

The Company requires directors, executives, and senior accounting/finance management at department-manager level or equivalent who have access to insider information to refrain from trading the Company’s securities during the period preceding the public disclosure of financial statements or any financial/operational information until such information has been disclosed to the public. The Company shall notify such persons in writing to refrain from trading the Company’s securities for at least thirty (30)

days prior to public disclosure, and they should wait at least twenty-four (24) hours after disclosure before resuming any trading. Insider information must not be disclosed to any other person during this period.

4. Prohibition of Insider Trading and Disclosure

All personnel of the Company, at every level, including their family members, who possess insider information that could materially affect the price or value of the Company's securities and has not yet been publicly disclosed, are strictly prohibited from: (a) Using such information to buy, sell, or enter into derivatives contracts related to the Company's securities, whether for themselves or others, unless otherwise permitted by law; or (b) Disclosing such information, directly or indirectly, to any other person who knows or should reasonably know that such information may be used for securities trading or entering into derivatives contracts. Furthermore, personnel and their family members are prohibited from disclosing insider information to others for the purpose of enabling such persons to trade the securities or derivatives for their own benefit or for compensation.

5. Confidentiality Obligations

All directors, executives, employees, and former employees of the Company and its subsidiaries must keep the Company's and subsidiaries' confidential and/or insider information, as well as confidential information of the Company's business partners, in strict confidence. Such information must not be disclosed or used for the benefit of any other company or third party, even if such disclosure does not cause direct damage to the Company, its subsidiaries, or its business partners.

6. Prohibition of Misuse of Position or Information

All directors, executives, and employees of the Company and its subsidiaries shall not use their positions, insider information, or any material non-public information obtained during their employment for improper personal gain or to benefit others, directly or indirectly, regardless of whether compensation is received.

7. Compliance with Applicable Laws

All personnel of the Company, including directors, executives, and employees, must strictly comply with the Securities and Exchange Act, and other relevant rules, regulations, and notifications concerning the use of insider information.

8. Disciplinary Actions

Any employee, executive, or relevant person who violates this Policy or uses insider information for personal gain shall be subject to disciplinary action, which may include a written warning, salary deduction, temporary suspension without pay, or termination of employment. The severity of disciplinary action shall depend on the intent and seriousness of the violation. The violator may also be subject to legal penalties as prescribed by competent authorities.

This Use of Insider Information Policy was approved by the resolution of the Board of Directors' Meeting No. 1/2022 held on June 20, 2022, and has been effective since June 20, 2022 onwards.

- Sign -

(Mr. Pachara Yutidhammadamrong)
Chairman of the Board of Directors