



Disclosure Policy

Group Lease Public Company Limited

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Disclosure Policy

Principle and Rationale

Group Lease Public Company Limited ("the Company") strives to comply with the disclosure rules and notifications of the SET and realizes that as being the listed company in the Stock Exchange of Thailand, the Company has the duty and responsibility to disclose its information correctly sufficiently, timely and equally especially the information that may have impact on the Company's share price or value or that has any influence on the investment decision making of the Company's share which will also reflect the image and credibility towards the Company as a whole.

Objectives

In order to disclose the Company's information, both financial and non-financial, to the shareholders and investors or general public in which such information should be correct, complete, timely and complied to the law and SET Notification through the SET's system, related agencies or through the Company's website or any other channels as appropriate so that all groups of investors shall be treated fairly and equally in accessing to the Company's information especially the inside information that may have the impact on the share price or value of the Company to support their investment decision in the Company's share prudently, the Company, therefore, deems it appropriate to determine this Disclosure Policy to serve as the best practical guideline for its Directors, executives and employees.

Scope:

- This Policy shall be applied to the Company's Directors, executives, employees as well as the spokesperson designated persons including all other persons in the Company.
- This Policy shall cover all disclosures of the important inside information both financial and non-financial which needs to be disclosed immediately and other information which is announced on the Company's website or published on other kinds of media.
- This Policy shall cover all disclosures released in forms of writing and verbal through direct conversation such as interview, press conference, analyst meeting or presentation presented by top management and the information announced on the Company's website or communicated through different means.

Types of information:

- Financial information and operating result on quarterly or yearly basis
- Significant inside information which is the information that has impact on the changing of the Company's share price or might have impact on the decision making of investors such as:
 - Merger & Acquisition, acquisition of business deal
 - Announcement of dividend or no dividend payment
 - Changing of par value or stock dividend payment
 - Acquisition / loss of significant commercial contract
 - Changing of major shareholder structure or any significant changing in Board of Directors and management
 - Borrowings which amount has significant impact on the Company's financial status and operating result
 - Issuance of significant amount of new shares by public offering or private placement
 - Important litigations
 - Acquisition/disposal of significant assets
 - Significant change in investment plan

- Changing of the Company's objective
- Important labor dispute
- Acquisition of tender offer in other company
- Changing in its significant accounting policy

Remark: the abovementioned inside information is only some examples so when making disclosure decision, the Regulation of the SET (BorJor/Por 11-0) RE: Rules, Conditions and Procedures Governing the Disclosure of information and Other Acts of a Listed Company B.E 2560(2017) shall also be considered.

- Other general information which does not have direct impact on the changing of the Company's share price or the decision making of the investors such as the changing of head office's address, the changing of directors or auditor, the amendment of the Articles of Association, etc.
- Public Relations information of the Company such as opening of new branch, new product or services, etc.

Authorized persons and disclosure roles

1. Chief Executive Officer shall be the highest authorized person to determine the drafted contents of the important information and to make decision whether to disclose or not disclose any such information as well as being the main spokesperson in disclosing important information of the Company.
2. Chief Financial Officer, the Investor Relations Officer, Legal Officer or Company Secretary shall assist the Chief Executive Officer in preparing important information or presentations to ensure that such information are complete, correct and in compliance to the Disclosure Rules
3. Chief Financial Officer or Head of Investor Relations can be designated by the Chief Executive Officer to be the spokesperson to disclose the Company's and its subsidiaries' information to the press, analyst or general investors.
4. Other persons might be designated by the Chief Executive Officer or Chief Financial Officer to communicate the information to outsiders only in the matters that related to the designated persons' responsible duties.

Practice Guidelines

1. The Company shall disclose financial information and important inside information that has impact on the Company's share price and also affects the decision making of the investors as well as other general non-financial information that does not have any impact on the Company's share price but needs to be disclosed in compliance with the SET's rule through the SET's disclosure channel according to the SET's regulation. Such information should be disclosed correctly, completely, clearly, adequately and on a timely manner so that all groups of people can access the information equally. In the event that such information is not yet due for disclosure, the Company shall ensure that such information shall be strictly kept confidential among the related persons only.
2. Those unauthorized persons or who are not designated to be the communicators or spokespersons of the information are strictly forbidden to communicate information especially the material inside information of the Company to outsiders or public.
3. The employees or executives are forbidden to disclose inside information to their close relatives or other persons both in writing and verbal or via other social channels and shall strictly treat such information as confidential information until it has been approved to be released and/or disclosed to the SET and public.
4. After the inside information has been disclosed to public through the SET's disclosure system, it shall be disclosed on the Company's website as well to ensure that the shareholders receive the information completely, correctly, timely, equally and easily accessible or disclosed through any other channels (as the case may be) and the appropriate timing of the disclosure of information shall also be taken into consideration.

5. In the event of the disclosure on the forecast on business situation and direction including the projection of operating result, the Company shall do it prudently providing altogether the clear explanation on the terms and conditions, the sources of data or other referenced guidelines to support such projections.
6. The Company shall not disclose important information by hiding the negative facts including the disclosing of uncertain matters as certain or disclose untrue or misleading information
7. The Company may delay disclosure of important information if such information or situation is not confirmed but shall disclose only when the situation is confirmed or finalized to avoid confusion of the investors in receipt of the information.
8. In case of rumors, leakage of inside information or an unintentional disclosure occurs, the Company will explain or disclose the fact of such rumors immediately or as soon as possible as deemed appropriate through the SET's electronic system (SETLINK) and post on the Company's website. In case of PR news or other information that does not have impact on the Company's share price, it shall be disclosed on the Company's website or other channels as deemed appropriate.
9. The Company may arrange special group meeting with fund manager or securities analyst or the investors who are interested in making investment in the Company or who requests a company visit in which in such meeting the Company shall disclose only the general information about the Company and we have the policy not to disclose the information or inside information that might have impact on the changing of the Company's share price except such information has already been disclosed to public through the SET's system.
10. Those who have obtained non-public inside information are forbidden to use the obtained information in buying or selling the Company's share.
11. Directors, executives and employees of the Company must comply strictly with this disclosure policy. Those who neglect or fail to comply shall be subject to a disciplinary action as regulated by the Company as the case may be.

Temporarily halt of the securities trading

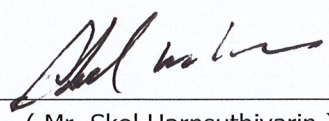
While waiting for important information to be disclosed completely and properly, it might be necessary for the Company to request for the temporary halt of the Company's securities trading so that the disclosure of the information will be done transparently and equally. The Chief Executive Officer is the only person who authorized to make the decision on the temporary trading halt request of the Company's securities.

Questioning on the Policy

Any questions regarding this Disclosure Policy should be brought up to the immediate supervisor or Investor Relations Department or Company Secretary.

Effective Date:

This Disclosure Policy shall be effective on 14 October 2020, onwards.


(Mr. Skol Harnsuthivarin)
Chairman of the Board
Group Lease Public Company Limited