



Insider Trading Policy

Group Lease Public Company Limited

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Insider Trading Policy

Principle and Rationale

Group Lease Public Company Limited ("the Company") realizes that buying and selling of the Company's securities of the insider persons who obtain or has access to inside information acquired during his/her duty performing which has not yet been disclosed to public is considered taking advantage on other general investors. Moreover, such trading characteristic is also considered illegal according to the Securities and Exchange Act and also considered breaching the Business Code of Ethics of the Company which is one of the disciplines which Directors as well as all employees need to comply strictly.

Objectives

In order to prohibit the exploitation of the non-public inside information of the Company's securities trading from the persons who involve in or who are able to obtain financial or other non-financial inside information that may have impact on the Company's share price acquired during their duty performing, the Company deems it appropriate to set up Insider Trading Policy in writing as the best practice guideline for the Directors, executives as well as all the employees.

Definitions

According to this Policy:

- Insider means

Persons who obtain the material inside information before it is disclosed to public, namely, shareholder with controlling authority, Directors and the first four executives of the Company in accordance with the definition of the Office of the Securities and Exchange Commission (the "SEC"), namely, CEO, COO, Group CFO, CFO-Thailand and Deputy Group CFO and or the persons holding equivalent position to the fourth executive. This shall also include the staff in Consolidation team and the Accounting Manager and Finance Manager of the Company, Legal team and staff in the Company Secretary Department including their spouse, parents, siblings and other persons who are under those persons' control or others who may obtain the material inside information of the Company before it is disclosed to public such as the Company's legal advisor, external auditor and PR advisor, etc.

- Inside information means

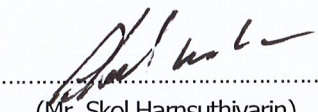
Financial information or other information that may affect the price of the Company's securities which has not been disclosed to public through the Stock Exchange of Thailand's system, for example, periodic financial statements or status, or other non-public information that has the impact on the Company's securities price such as payment or non-payment of dividend, merger and acquisition, gain/loss of significant commercial contract, increasing/decreasing of capital, etc. including those information containing in the SET's regulations (BorJor/Por 11-0) RE: Rules, conditions and procedures regarding information disclosure and any operations of listed companies B.E. 2560.

Practice Guidelines

1. Insider who obtains the inside information is prohibited from disclosing financial or other information that may affect the price of the Company's securities to any other persons or non-related person before it is disclosed to public through the Stock Exchange of Thailand's system.
2. Insider who obtains financial information or other inside information is prohibited from buying/selling or transferring/accepting transfer of the Company's securities for a period of 30 days (1 month) prior to the disclosing of such financial information or other inside information to public and the buying or selling of the Company's securities should not be done until 24 hours after the disclosure.
3. Directors and the first four executives of the Company in accordance with the definition of the SEC including the Company's external auditor must report the holding and any change in their holding of the Company's securities as well as their spouse and minor children to the SEC within 3 working days in accordance with the prescribed criteria and procedures and notify the Company Secretary and such transaction will be reported by the Company Secretary in the next Board of Directors' Meeting. The forbidden period shall be notified to those Directors and executives in advance by the Company Secretary so that they can comply correctly.
4. Any insider including those related employee who obtains inside information breaching this Policy by disclosing the financial information or other inside information that may affect the securities price and exploit the inside information for buying and selling of the Company's securities shall be subject to disciplinary action and penalty under the Securities and Exchange Act, Section 296 which is an imprisonment of not exceeding 2 years or a fine of not exceeding 2 times of the gain or potential gain from such breaching but not less than 500,000 Baht or both imprisonment and fine.

Effective Date:

This Insider Trading Policy shall be effective from 14 October 2020, onwards.


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