Policy and Practice for the Prevention of Insider Trading

Origin Property Public Company Limited

(Review and Approved by the Board of Directors at Meeting No. 3/2026 on August 14, 2026.)

Record of revision

No.	Effective Date	Summary of Changes
00	23/09/2017	Initial Effective Date
01	14/08/2026	Comprehensive revision to align with the Company's goals following its declaration of participation in the Listing Company Value Enhancement Program (JUMP+).

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Origin Property Public Company Limited is committed to conducting its business in accordance with the principles of Good Corporate Governance to ensure that information is disclosed equally to all stakeholder groups (Fair Disclosure) and that non-public price-sensitive information ("inside information") is strictly safeguarded.

1. Objectives

This policy is established to serve as Practice for preventing the disclosure of non-public inside information to third parties prior to public disclosure to general investors, where it is known or ought to be known that the recipient would use such information to purchase or sell securities, or enter into derivatives contracts related to such securities, for self-interest or gain. Such actions may create an unfair advantage and lead to unfair trading practices involving securities, which constitutes an offense under the Securities and Exchange Act B.E. 2535 (1992) ("Securities and Exchange Act"), as amended, for directors, executives, and employees of the Company and its subsidiaries.

2. Definitions

"The company" means Origin Property Public Company Limited

"Inside Information" means facts or information that have not yet been disclosed to the general public, which are material to the change in the price or value of the securities of the Company, its subsidiaries, or its associated companies that are listed companies, and have an effect on investors' decision-making.

"Classification of Inside Information" means the classification of information within the context of information security based on its level of sensitivity and impact on individuals and the organization, including management methods for each type of information, as well as handling procedures for confidential or critical information prior to its destruction, disposal, or re-use, as specified in the Company's ***Information Technology Security Policy.***

"Confidential Information" means customer data, manufacturing formulas, innovations, trade secrets, new product information to be launched to the market, and other similar information.

"Personal Data" means information relating to an individual which enables the identification of such individual, whether directly or indirectly. Personal Data is categorized into 2 groups: Group 1: **General Personal Data**, and Group 2: **Sensitive Personal Data**, as specified in the Company's ***Personal Data Protection Policy.***

"Inside Information Material to Investor Decision-Making" means information that has not yet been disclosed to the general public, comprising significant company information that impacts changes in the price or value of securities and is sufficiently clear that general investors would likely use it to form investment decisions, which includes:

1. Profit or loss
2. Revenues that change significantly from prior periods or remain flat in a manner significantly contrary to market trends
3. Declarations of dividend payments, stock dividends, or non-payment of dividends
4. Capital increases or capital reductions
5. Launch of major new products, significant developments regarding resources, technology, products, and markets, or major natural resource discoveries
6. Changes in material accounting policies
7. Assets, liabilities, liquidity, and financial condition of the listed company
8. Operating results or performance forecasts of the listed company
9. Future developments or investment projects
10. Changes in major shareholders, controlling persons, or key executives
11. Accuracy or currency of previously disclosed information
12. Financial reports and financial condition analysis
13. Information regarding strategic partnerships, joint venture project developments, business combinations, acquisitions, business disposals, or concession applications
14. Changes in par value
15. Acquisition or loss of major commercial contracts
16. Guarantees provided or redemptions of securities
17. Borrowings in amounts material to the financial condition and operating results

18. Issuance of a material amount of new capital shares offered to the public or any person
19. Making a tender offer for the securities of another company
20. Changes in company objectives
21. Significant legal disputes

"Immaterial Information" means information that is not material to changes in the price or value of securities and is not required to be disclosed through the Stock Exchange of Thailand (SET) in accordance with the regulations prescribed by the SET, including:

1. Public relations information, such as invitations to shareholders for routine company visits, or news releases on new product launches representing ordinary business expansions
2. Future operational plans extending beyond 6 months, excluding finalized future operational plans, such as definite operational plans resulting from new business acquisitions or established business expansions
3. Presentation materials used in meetings with various parties, provided that the information contained therein has previously been disclosed by the listed company via the SET or the Company's website
4. Presale, backlog, or passenger volume data that is continuously disclosed and does not significantly impact investment decisions

"Securities" means shares, warrants, Non-Voting Depository Receipts (NVDRs), Transferable Subscription Rights (TSRs), Derivative Warrants (DWs) underlying the Company's securities (excluding index DWs), convertible debentures, and structured notes, as well as derivative contracts underlying the Company's securities traded on a derivatives exchange (Single Stock Futures).

"Trading" means purchasing, selling, transferring, or accepting the transfer of securities or derivatives contracts.

"Aggregate Value" means the total cumulative value of all purchases, sales, transfers, or acceptances of transfer of securities or derivatives contracts executed by oneself and Related Persons.

"Executive" means the Chief Executive Officer (CEO), the top four executives below the Chief Executive Officer, including all persons holding positions equivalent to the fourth executive, the Chief Financial Officer (CFO), and the accounting controller or any person holding an equivalent position.

"Reporting Persons" means directors, executives, their spouses or cohabiting partners (unmarried partners living together openly), minor children, juristic persons in which the aforementioned persons collectively hold more than 30 percent of the total voting rights and hold the largest shareholding proportion in such juristic person (counting only a single tier of juristic person), and the auditor.

3. Duties and Responsibilities

1. All directors, executives, employees, and/or Insider List of the Company and its subsidiaries shall strictly comply with this Policy and Guidelines on the Prevention of Insider Trading for Personal Gain.
2. All executives are responsible for ensuring that their subordinates are aware of the importance of, and fully understand, this Policy and Guidelines on the Prevention of Insider Trading for Personal Gain.
3. Current and former directors, executives, employees, and/or Insider List of the Company and its subsidiaries are obligated to maintain the confidentiality of the Company's and its subsidiaries' confidential information and/or inside information. The use of inside information must be solely for the benefit of the business operations of the Company and its subsidiaries. Disclosing or using such secrets or inside information for the benefit of any other company in which they are a shareholder, director, executive, or employee is strictly prohibited.
4. The Chief Executive Officer (CEO) and/or Chief Financial Officer (CFO) shall have the authority to approve the disclosure of inside information to the public.
5. Executives or insiders List of the Company and its subsidiaries responsible for mandatory disclosures shall ensure that the information to be disclosed is verified for accuracy, sufficiency, and reliability prior to dissemination.
6. The Company Secretary shall ensure that the Company complies with disclosure requirements applicable to listed companies, and publicly disseminates the Policy and Practice on the Prevention of Insider Trading for Personal Gain to general investors.

   In the event that the information involves directors or major shareholders (such as negotiations for share trading or confirmation of conflict of interest in a transaction), all directors should verify the accuracy of the information in which they may be involved.

7. The Company Secretary and/or Investor Relations shall monitor, oversee, and coordinate the disclosure of information with the Stock Exchange of Thailand (SET) and other relevant parties, such as securities analysts, stockbrokers, shareholders, the media, and the general public.
8. The Company Secretary shall be responsible for summarizing and submitting reports on securities holdings and changes in securities holdings to the Board of Directors for acknowledgment.

4. Practice for the Prevention of Insider Trading

4.1 Prohibition of Inside Information Usage for Securities Trading and Seeking Benefits

4.1.1 Directors, executives, employees, and/or insider List of the Company and its subsidiaries who, by virtue of their positions or status, become aware of inside information of the Company and its subsidiaries that has or may have an impact on changes in the price of the Company's securities, which has not yet been disclosed to the general public, are strictly prohibited from using such information, whether directly or indirectly, to purchase, sell, offer to purchase, offer to sell, or solicit any other person to purchase, sell, offer to purchase, or offer to sell shares or other securities (if any) of the Company, in a manner that is likely to cause damage to the Company, whether directly or indirectly, and regardless of whether such act is done for their own benefit or for the benefit of others, or disclosing such facts to enable others to perform such acts, whether or not remuneration or benefit is received.

4.1.2 Directors, executives, employees, and/or insider List of the Company and its subsidiaries are strictly prohibited from disclosing inside information to third parties where it is known or ought reasonably to be known that the recipient may use such information for the benefit of purchasing or selling securities, or entering into derivatives contracts related to securities pursuant to Section 242 (2) of the Securities and Exchange Act B.E. 2535 (1992), as amended.

4.2 Prohibition of Disclosure of Inside Information and Confidential Information of the Company and Business Partners

4.2.1 Directors, executives, employees, and/or insider List of the Company and its subsidiaries, as well as former directors, executives, and resigned employees, are strictly prohibited from disclosing inside information or confidential information of the Company and its subsidiaries, as well as confidential information of business partners of the Company and its subsidiaries obtained through the performance of their duties, to third parties, regardless of whether such disclosure causes damage to the Company, its subsidiaries, or their business partners.

4.2.2 The Company implements measures to prevent the misuse of inside information by classifying information sensitivity and restricting access to non-public information strictly on a need-to-know basis. In addition, internal information security systems are maintained, under which data owners must direct relevant personnel to strictly comply with the Company's Information Technology Security Policy.

4.3 Reporting of Securities Holding and Changes in Securities Holding

4.3.1 Directors, executives, their spouses or cohabiting partners (unmarried partners living together openly), minor children, juristic persons controlled by Reporting Persons, and the auditor shall prepare and disclose reports on securities holdings and reports on changes in securities holdings of the Company to the SEC Office pursuant to Section 59, and subject to penalties under Section 275, of the Securities and Exchange Act B.E. 2535 (1992), as amended, and shall submit copies of such reports to the Company Secretary every time a disclosure is made.

4.3.2 Prior to any change in securities holdings, Reporting Persons shall notify their intention to execute a securities transaction to the Company Secretary at least one (1) business day in advance of such transaction via telephone, electronic mail, or any other designated methods.

4.3.3 Timeline for Report Submission

(1) Initial Reporting of Securities Holdings: Reporting Persons shall submit their initial report within thirty (30) days from the date of appointment to their position.

(2) Reporting Changes in Securities Holdings (Purchases, Sales, Transfers, or Acceptances of Transfer): Reporting Persons may submit reports according to either of the following conditions:

(2.1) Submit a report for each transaction within three (3) business days from the date of the transaction, regardless of the transaction value; or

(2.2) Submit a report upon meeting either of the following conditions, whichever occurs first, within three (3) business days from the date on which the condition or time period is fulfilled:

(2.2.1) When the aggregate transaction value reaches THB 3,000,000 (Three Million Baht) or more; or

(2.2.2) Upon the completion of a six (6) month period from the date of the initial transaction.

Provided that, in the event that both spouses or cohabiting partners are directors or executives of the same listed company, either the director or executive, or their spouse or cohabiting partner, may submit the report on behalf of both parties as a single reporting unit.

4.4 Blackout Period

Directors, executives, employees, and/or insider List of the Company and its subsidiaries who become aware of material inside information that affects changes in the price of the Company's securities shall exercise caution and refrain from trading the Company's securities during the following periods:

(1) During the period of one (1) month prior to the public disclosure of financial statements or material inside information.

(2) During the period of twenty-four (24) hours following the public disclosure of such financial statements or material inside information.

In maintaining confidentiality during the Blackout Period, personnel with access to inside information shall not disclose such information to third parties until it has been officially reported to the Stock Exchange of Thailand (SET).

5. Practice for Preparing the Insider List

The Company has identified groups of individuals associated with inside information and established an Insider List authorized to access inside information, as well as a Project-Specific Insider List, as follows:

5.1 Insider List refer to individuals who know or possess inside information, including those authorized to access inside information for all transactions that may impact the price of securities, which include:

(1) Directors, executives, and controlling persons of the Company.

(2) Employees or staff members occupying positions or functions responsible for inside information or having access to inside information, such as internal auditors, investor relations, and the company secretary.

(3) Auditors, financial advisors, legal advisors providing transactional advisory services, credit rating agencies (CRAs), property appraisers, or any other persons performing duties related to inside information.

5.2 Project-Specific Insider List refer to individuals who are aware of or have access to inside information (non-public price-sensitive information) concerning specific temporary projects or transactions that have not yet been disclosed to the public, where such transactions may affect the price of securities or investment decisions.

The Company shall regularly update these lists.

6. Practice on Management of Non-disclosable Inside Information

6.1 Information Eligible for Delayed Disclosure

In the event that the Company possesses inside information that cannot yet be disclosed to the public due to inconclusive outcomes or high uncertainty, the Company shall closely monitor the situation and disclose such information immediately once a definitive conclusion or certainty is reached. Examples of such situations include:

- Matters currently under negotiation, where premature disclosure might adversely affect the outcome of negotiations; and
- Matters requiring approval from the Board of Directors or other relevant parties, where disclosure during the approval process could lead to misunderstandings among investors.

6.2 Disclosure in Case of Risk of Information Leakage

In the event of a situation where the Company assesses that there is a risk of inside information leakage prior to confirming the relevant facts and impacts, the Company shall proceed to make a preliminary public disclosure containing the following information:

(1) Details of the matter to the extent they can be specified;

(2) An explanation of the reasons why complete facts cannot yet be provided; and

(3) A commitment by the listed company to disclose full details of the information at the earliest possible opportunity.

6.3 Disclosure in Case of Necessity to Relevant Duty Holders or Specific Groups

In the event that it is necessary to disclose inside information to relevant persons performing essential operational roles for the Company such as auditors, financial advisors, legal advisors providing transaction advisory services, credit rating agencies (CRAs), asset appraisers, or any other persons performing duties related to inside information prior to public disclosure of such information, the Company shall require such persons to execute **a Non-Disclosure Agreement (NDA)** before disclosing any inside information to third parties or relevant entities. This is to ensure that such relevant personnel or specific groups are aware of their duty to maintain confidentiality until public disclosure is made, thereby preventing the misuse or unauthorized disclosure of such information to third parties.

7. Training and Communication

7.1 Educate and inform directors and executives of the Company regarding their duties to report securities holdings, including any acquisition or disposition of securities held by themselves, their spouses, and their minor children, to the SEC Office pursuant to Section 59 (subject to penalties under Section 275) and Section 246 (subject to penalties under Section 298) of the Securities and Exchange Act B.E. 2535 (1992), as amended.

7.2 Educate and train directors, executives, employees, and/or insider List of the Company and its subsidiaries on the Policy and Practice on the Prevention of Insider Trading for Personal Gain, the Company's information disclosure procedures, and foster awareness of the key principles governing the Company's disclosure policy.

7.3 Disclose this Policy in the Company's Annual Report (Form 56-1 One Report) and on the Company's website, and communicate the policy to all employees to ensure organization wide awareness and compliance.

8. Monitoring and Reporting

8.1 The Management is responsible for monitoring and reporting compliance with this Policy and Practice on the Prevention of Insider Trading for Personal Gain to the Board of Directors at least once a year. In the event a violation is detected, clear corrective action plans and preventative measures against recurrence shall be specified, and records/statistics of policy violations or breaches shall be maintained.

8.2 The Company shall establish a compliance audit process conducted by an independent unit to monitor and verify adherence to this Policy.

9. Policy Non-compliance

In the event of any violation of or non-compliance with this Policy and Practice on the Prevention of Insider Trading for Personal Gain, the Company and its subsidiaries shall consider such violation a disciplinary offense under the Work Rules and Regulations of the Company and its subsidiaries. Disciplinary penalties shall be imposed as deemed appropriate on a case-by-case basis, ranging from verbal warnings, written warnings, and probation, up to termination of employment by discharge, dismissal, or retirement, as applicable.

10. Policy Review

The Company shall review this Policy and Practice on the Prevention of Insider Trading at least once a year.

This Policy shall take effect from August 14, 2026 onwards.

-Chatchai Payuhanaveechai-

Mr. Chatchai Payuhanaveechai

Chairman of the Board of Directors

Origin Property Public Company Limited