




PRTR Group Public Company Limited.

Insider Information Policy.



	PRTR Group Public Company Limited Insider Information Policy	Revision	05
		Date of approval	10 Nov 2025
		Page	1 / 9

This Insider Information Policy is the exclusive property and copyright of PRTR Group Public Company Limited. The Company is dedicated to developing its corporate governance system in full alignment with the principles of good corporate governance, best practices, as well as the laws, rules, and regulations prescribed by official and regulatory authorities.

The Board of Directors approved this Insider Information Policy at Board Meeting No. 1/2020 on February 28, 2020. It is established to serve as the fundamental principle and operational guideline for executives, employees, and all related parties of the Company and its subsidiaries, effective from March 1, 2020, onwards.

To ensure that the Insider Information Policy remains current and appropriate to evolving situations and changes, a formal review of the policy shall be conducted at least once a year. Any amendments or revisions must be approved solely by the Board of Directors.



(Mr. Niphon Boondechanan)

Acting Chairman of the Board of Directors.



	PRTR Group Public Company Limited Insider Information Policy	Revision	05
		Date of approval	10 Nov 2025
		Page	2 / 9

Table of Contents

1. Introduction	3
2. Objectives	3
3. Scope	3
4. Internal Information Use Policy	3
4.1 Insider Information Policy	4
4.2 Internal Disclosure Practices	5
4.3 Securities Trading by Directors, Executives, and Employees	7
5. Revision History	9

	PRTR Group Public Company Limited Insider Information Policy	Revision	05
		Date of approval	10 Nov 2025
		Page	3 / 9

1. Introduction

PRTR Group Public Company Limited (the “Company”) places the highest priority on the appropriate use and protection of internal information belonging to both the Company and its clients. This encompasses corporate data, information concerning clients and business partners, as well as general and personal data of job candidates (Candidates) maintained for the Company’s internal operations. Recognizing that the misuse of such information could lead to significant legal implications and adversely affect business operations, the Company has established this Insider Information Policy to serve as a definitive guideline for compliance.

2. Objectives


- 2.1 To establish a comprehensive Insider Information Policy for the Company and its subsidiaries, ensuring a unified and consistent approach to practical implementation across the group.
- 2.2 To serve as a formal communication tool by providing a written Insider Information Policy for personnel of the Company and its subsidiaries, fostering a shared and standardized understanding of the principles regarding the use and protection of internal information.

3. Scope

This policy applies to the Company and its subsidiaries, encompassing the overarching policies and operational guidelines for practical implementation.

4. Internal Information Use Policy

The Company shall maintain and utilize its internal data with strict adherence to data confidentiality, security, and compliance with relevant laws and regulatory requirements. 'Company Data' encompasses information acquired or generated by the Company, as well as data pertaining to clients, business partners, and job candidates

	PRTR Group Public Company Limited Insider Information Policy	Revision	05
		Date of approval	10 Nov 2025
		Page	4 / 9

(Candidates) received directly from the data subjects or other sources, including employee salary information, among others. The utilization of such data must strictly align with the Company's defined business objectives. Any individual in possession of or with access to this information is strictly prohibited from using it for purposes outside of the Company's business scope, for personal gain, or for the benefit of third parties. Furthermore, the disclosure of Company Data to unauthorized persons without prior approval from authorized personnel is strictly forbidden. Accordingly, the Company has established the following policies and guidelines:

4.1 Insider Information Policy


Personnel at all levels have a duty to maintain the confidentiality and security of information in order to protect sensitive data.

(1) Data confidentiality layer

Trade secrets, which constitute the Company's internal information, must be strictly protected against leakage to external parties. The internal sharing of information must remain strictly within the framework of one's assigned duties and responsibilities. The confidentiality of such data is classified into levels based on its significance, from lowest to highest, as follows: 1) Public Information, 2) Internal Use Information, and 3) Confidential Information.

(2) Use of Inside Information

Due to the diversity of the Company's stakeholders, all operations must be conducted with equity and fairness for all parties. To prevent any legal misconduct, personnel at all levels and all related parties who possess or may have access to material non-public information should avoid trading in the securities of the Company where they serve as directors or executives. However, should any trading of the Company's securities occur, it must be conducted with utmost prudence, ensuring that no non-public insider information is utilized. Furthermore, upon the completion of any securities transaction, such trade must be formally reported in strict compliance with the rules and regulations

	PRTR Group Public Company Limited Insider Information Policy	Revision	05
		Date of approval	10 Nov 2025
		Page	5 / 9

prescribed by the Stock Exchange of Thailand (SET) and the Securities and Exchange Commission (SEC).

4.2 Internal Disclosure Practices

Directors, executives, employees, and relevant personnel of the Company and its subsidiaries may, at times, handle information or documents that are restricted from disclosure or constitute trade secrets. This includes non-public internal information, bidding data, strategic plans, financial figures, and various inventions, all of which are the proprietary rights of the Company. Protecting such information is of paramount importance.

Personnel at all levels are duty-bound to maintain the confidentiality and security of this information to prevent unauthorized disclosure.


(1) Providing Information to External Parties:

Any Company information released to external parties or the general public must receive prior approval from the Chief Executive Officer (CEO) or a designated authorized person.

The Company has appointed Investor Relations (IR) officers to be responsible for public communications and IR functions. The IR team shall coordinate with the relevant data-owning departments to consolidate details into official information, which must then be approved by the CEO or a designated person before dissemination.

(2) Expressing Opinions to External Parties:


The Company personnel must refrain from answering questions or expressing opinions to external parties unless they are specifically authorized or assigned to do so. In cases where no such authority exists, personnel should politely decline to comment and advise the inquirer to contact the CEO or the designated spokesperson directly.

	PRTR Group Public Company Limited Insider Information Policy	Revision	05
		Date of approval	10 Nov 2025
		Page	6 / 9

4.3 Securities Trading by Directors, Executives, and Employees:

The rules and guidelines governing securities trading by directors, executives, and employees are established to ensure full compliance with the Securities and Exchange Act B.E. 2535 (1992) and other relevant regulations. These measures are designed to uphold the confidence of shareholders and investors in the Company's securities, with details as follows:

Persons banned from trading	Prohibited Securities	Trading Prohibition Period	
		In case of disclosure of financial statements	In the event of an event that may affect the price of securities.
The Company Subsidiaries Associates of Directors Executives, employees and/or related persons of the Company, its subsidiaries and associates who are in positions or lines of work who have access to inside information.	Securities of the Company, its subsidiaries and associates	1 month before the meeting date The Board of Directors has an agenda to consider and approve the financial statements. Money up to 1 day After the disclosure of financial statements through the information disclosure channel of the Stock Exchange of Thailand.	14 days before the date of the Board of Directors' meeting with the agenda to approve matters that may affect the securities price up to 1 business day after disseminating the matter through the information disclosure channel of the Stock Exchange of Thailand.

	PRTR Group Public Company Limited Insider Information Policy	Revision	05
		Date of approval	10 Nov 2025
		Page	7 / 9

Pre-trading Notification

All individuals designated by the Company who intend to trade the Company's securities are requested to notify the Board of Directors, or its designee—specifically the Company Secretary—at least one business day prior to the intended transaction. Such notification of intent must be submitted through the channels officially prescribed and announced by the Company.

Directors and executives (including their spouses and minor children) are required to report any changes in their securities holdings to the Securities and Exchange Commission (SEC) in accordance with Section 59 of the Securities and Exchange Act B.E. 2535 (1992), as amended. The disclosure of such changes must be completed within three business days from the date of the transaction. Furthermore, the Company Secretary shall consolidate, summarize, and present these reports to the Board of Directors for acknowledgment on a quarterly basis.

4.4 Preventive Measures and Penalties

(1) Preventive Measures


To ensure the orderly compliance with this policy, the Company has established the following preventive measures:

1) Access to non-public information is strictly limited to individuals on a 'need-to-know' basis. Such individuals shall be formally notified that the information is confidential and subject to usage restrictions.

2) Establish workplace security systems to safeguard confidential files, databases, and physical documents.

3) Owners of non-public information are responsible for ensuring that all related parties strictly adhere to established security protocols.

4) Directors, executives, employees, and relevant personnel of the Company and its subsidiaries must strictly comply with all laws regarding confidential information, including but not limited to: the Securities and Exchange Act B.E. 2535 (1992), the Personal

	PRTR Group Public Company Limited Insider Information Policy	Revision	05
		Date of approval	10 Nov 2025
		Page	8 / 9

Data Protection Act (PDPA) B.E. 2562 (2019), the Computer-Related Crime Act, the Public Limited Companies Act B.E. 2535 (1992), and all other relevant legislation.

(2) Penalties

Any misuse of internal information shall be subject to disciplinary action, ranging from a written warning and temporary suspension without pay to termination of employment. Furthermore, the offender may be required to compensate the Company for any financial damages incurred. Penalties shall be determined based on the severity of the misconduct, and legal proceedings may be initiated as deemed appropriate on a case-by-case basis.

Appendix: List of Companies Subject to This Policy

This policy applies to **PRTR Group Public Company Limited**, as well as its subsidiaries under its direct or indirect control.

The companies within the scope of this policy include the following:

1. PRTR Recruitment Company Limited
2. PRTR Recruitment and Outsourcing (Eastern Seaboard) Company Limited
3. Nexmove Platform Recruitment Company Limited
4. The Blacksmith Company Limited
5. Pinno Solutions Company Limited
6. PRTR Global Recruitment Company Limited
7. Biz Resource Company Limited

Remarks:

- Newly established subsidiaries or subsequent investments shall automatically fall within the scope of this policy, unless otherwise specified.
- For companies not under the Company's control, this policy may be adopted and applied as appropriate.

Additional Note: This appendix shall be deemed an integral part of this policy and shall have the same full force and effect as the main policy in all respects.