

Communication and Disclosure Policy

1. Principle

Grandline Innovation Company Limited (GLI), hereinafter referred to as the “Company”, places importance on the disclosure of information on a timely, transparent, appropriate, and unbiased basis to shareholders, investors, and the public to provide investors with information to make decisions about investing in the Company's securities. Such information must comply with rules and regulations while protecting sensitive and confidential information of the Company. Therefore, the Company has established a communication and disclosure policy. As a guideline for management and related employees

2. Person with authority to disclose information

Chairman of the Board, Chief Executive Officer (CEO), Chief Operating Officer (COO), Chief Financial Officer (CFO), and Investor Relations (IR) are authorized to disclose information. They may explain the information themselves or may assign relevant persons to clarify.

- Supervision by the Chief Executive Officer (CEO)
 - Ensure that the company has complied with the disclosure requirements as a listed company and a policy of disclosing information to investors in advance.
 - Ensure that the information is correct, sufficient, and reliable before disclosure. In the case of information related to directors or major shareholders such as buying securities, or confirmation of stockholding in the transaction, directors and all related parties should verify the accuracy of the information.
 - Act on behalf of the Chief Executive Officer to review disclosure documents such as the acquisition or disposition of assets and related transaction and information of the Company before disclosing to the public.
 - Follow up, supervise, and coordinate information disclosure with the Stock Exchange of Thailand and other related parties such as securities analysts, brokers, shareholders, media, and the public.
 - Ensure company directors and employees have knowledge about the information disclosure policy and raise awareness of the important of the Company's information disclosure policy.
 - aware of the information to be disclosed in advance to reduce the risk of violating the disclosure requirements “Guidelines for handling confidential information affecting securities prices” and should rehearse and summarize necessary information to the corporate communications department before giving information to third parties to prevent inaccurate disclosure of information or inside information.

3. Data Management

Company's information includes quarterly financial results, performance report, Five-year strategic plan, Company strategy Business model, major mergers and acquisitions, or investments plan including other information

related to significant events. This information might cause uncertainty and affect investors decisions, or change in Company stock price

In the event of misleading information or untimely information disclosure, it can affect negatively to the stock price and company's operation. The person with authority to disclose information or the authorized officer responsible for clarifying information through the Stock Exchange of Thailand or other channels shall act immediately to clarify the public.

3.1 Consideration of "Inside Information"

Generally, inside information is prohibited from being disclosed to anyone (unless it is necessary that the company must disclose information to the relevant persons) before disclosure to investors. In this case, it means important information that has not yet been disclosed to the public which might affect the price or value of the Company's. This information or insiders that are likely to have significant implications for price changes or value of securities or investment decisions with such information including information about the company major shareholder or key executives. In addition, it is the information that investors should use in making investment decisions.

However, not all information has yet been disclosed will be considered inside information. In some cases, information classified as material has not yet been disclosed may not affect the price or the decision of investors. For example, the general public can expect from the information previously disclosed or information that may affect investment decisions without using information from internal sources but due to external factors such as information on market conditions, etc.

Consideration of the significance of the data cannot be defined as an exact numerical level or proportion to be used in every circumstances. It will depend on the impact or significance of the information. There are several factors that must be considered such as the size of the company, background of the situation, reliability of information, market sentiment related to the Company or market sector, etc., including the opportunity that investors should get from such information. In general, information that has an impact on the following matters often affect the decision of investors.

- Assets, liabilities, liquidity, and financial position of the Company.
- Performance or expected performance (e.g., Earnings Preview, revenue, and expense forecasts).
- Business operations of listed companies.
- Future developments or investment projects.
- Changes in major shareholders or key executives.
- the accuracy or timely manner of previously disclosed information.

The above information covers both factual parts and analysis of financial position. Therefore, if the Company will disclose the above information to a specific group of persons such as securities analysts,

the Company must ensure that such information is disclosed in accordance with the internal disclosure practice.

Table 1 Types of information that can be considered inside information

<p>Inside information</p>	<p>Information that is <u>insignificant</u> to changes in the price or value of securities.</p>
<p>Information that affects investors buying/selling stock is required to be disclosed according to SET regulation such as</p> <ul style="list-style-type: none"> - Profit - Income that has changed <u>significantly</u> from the previous period or fixed in a direction that is <u>significantly opposite</u> to market conditions - Declaration of dividend payment - Capital increase or capital reduction - Major new product releases, Major developments in resources, technology, products, and markets. - Major accounting policy changes 	<p>Information that does not need to be disclosed through the SET according to the regulation by the Stock Exchange of Thailand such as</p> <ul style="list-style-type: none"> - Information related to public relations such as inviting shareholders to visit the company or news of the launch of new products that expand the existing business - Future action plans that are longer than 6 months, but do not include future action plans that are already certain, for example, future action plans from acquiring new businesses or expanding existing businesses, etc. - Presentations used for meetings with various people in case that the information shown in the document is information that the Company already disclosed through the stock exchange or the company's website

3.2 Management of inside information that cannot be disclosed

- In cases that the disclosure needs to be delayed.

In the circumstance that the company is facing uncertainty or inconclusive events, there is a possibility that there will be delayed in information disclosure. The Company must closely monitor the situation and disclose such information in accordance with the internal disclosure practice as soon as a conclusion or certainty is reached. For example:

- Issues that are under negotiation or that disclosure could affect negotiations.
- Issues that require approval from an outside organization or other person in which the disclosure during the approval request may affect in a way that may cause investors to misunderstand.
- Confidentiality of undisclosed inside information

- During the period that internal information cannot or has not been disclosed, the Company is obliged to maintain the confidentiality of such information. To prevent anyone from seeking benefits or unlawfully disclosed, Company is following “Guidelines for Information Management Affecting Securities Prices”
- Disclosure of information in case there is a risk of information leakage
In the situation that causes the company acknowledge that there is a risk of internal information leaks before the facts and the relevant impacts can be confirmed. The Company will make a preliminary disclosure of the situation with the following information:
 - Details of the subject as far as identify.
 - Explain the reasons for not being able to provide complete facts.
 - Show the commitment to disclose the details of the information at the earliest opportunity.
- In the circumstance that information is required to be disclosed to relevant persons
In certain situation, it is required to disclose inside information to the relevant parties who have a role to perform the necessary tasks to the Company such as legal advisors acting in consultation on transactions, or the credit rating agency (CRA), etc., Without disclosing such information in accordance with internal disclosure guidelines, recipients are aware of their duties and have a system to maintain confidentiality. To prevent the use of information or disclose to others, the Company will follow the “Confidential Information Management Practices Affecting Securities Prices”
- Actions in case of rumors, data leak and/or inadvertently disclosed
 - The company provides a process for dealing with rumors, information leak and accidental disclosures. If rumors or information that have been leaked or disclosed accidentally, the company will clarify or disclose that information within the internal information disclosure practice. However, even if such case is not an issue of inside information, the Company will also disclose such information through its website.
 - The Company will review after the use of information to a specific group of people to verify whether there is any inadvertently providing inside information, for example, in the case of the Company meeting with investors after the quarterly financial statement’s announcement, and answering questions by disclosing internal information, etc., If such a case occurs, in order to mitigate the impact that may occur from the disclosure of inside information to a specific group of people, the company will disclose information within the practice of disclosing inside information and will immediately disclose the documents via the Company's website.

3.3 Disclosure of information to specific individuals

The Company communicates and builds good relationships with investors and other related parties such securities analysts via multiple channels. This will benefit both the company and other party. This

action must be done in the principle that the Company will disclose information equally, timely, and accurately. Both in terms of content and duration, the Company is following practices:

- Data preparation
- Provide information that will be used to meet with specific people in advance that has been verified that does not contain internal information. If there is inside information that has not yet been disclosed, the Company will consider whether it should disclose that information in with internal information disclosure practices prior to meeting or keeping confidential information. By disclosure the information too early during high uncertainty can lead to investors misunderstanding.
- Disclosure of inside information to specific groups of people
 - (1) The Company may not disclose inside information to specific groups of people. However, if the information is disclosed to a specific group of people, the Company must notify the person receiving the information of the obligation to maintain the confidentiality of the information until it is disclosed including disclosing such information must follow the guidelines for disclosing internal information immediately “Confidential Information Handling Practices Affecting Securities Prices”. For example, maintaining a list of insiders involved in transactions that may affect securities prices, and must not disclose such information follow the internal information disclosure practices.
 - (2) The Company must answer questions with great caution when answering questions that are outside the scope of the given information presentation. Using the following guidelines
 - Only provide information that has been disclosed in accordance with internal information disclosure guidelines, and answer questions from such information only.
 - If there is a question that the company needs to answer with the use of internal information, the company must not answer that question. Instead, the company may take note of the questions. If the company considered that the inside information can be disclosed to the public or is deemed useful and wishes to answer that question, the Company shall disclose information to the general public first before answering that question.
 - (3) Providing opinions on financial analysis of securities analysts is limited only to the matters of inaccuracies of facts and assumptions, such as facts about changing business information with clear origins and avoid answering questions that may suggest that the Company's estimates are inaccurate. In addition, when managing Earnings Expectations, use information that is continually disclosed to indicate where the forecasted revenue is likely to be. If there is a change in the earnings forecast, the company must disclose the information which follow the internal information disclosure practices before providing information to third parties.

3.4 Internal Information Protection Guidelines (General)

Personnel at all levels of the Company have duty to know the information security procedures, protect confidential information, and prevent confidential information from being accidentally disclosed.

- Determining the confidentiality hierarchy of information
- Trade confidential information which is internal information of the Company must be concealed so that it cannot be leaked to outsiders. It can be divided into 3 steps from least importance to the highest importance which are, disclosable information, Controlled information, and Confidential Information. Sharing of inside information must be within the framework of duties and responsibilities by assigned staff only.
- Disclosable information is information that can be disseminated or communicated to the public, such as quality policy, vision, mission, social activities, etc.
- Controlled information is information that controls the dissemination of the scope within the company only such as operation method, performance results, etc.
- Confidential information is information that controls the release of only individuals, departments, or committees. If disclosed to unrelated people, it will cause damage to the company, such as employee salary information, project information, preparation of tenders, etc.

3.4.1 Duties and Responsibilities of Internal Control (General)

3.4.1.1 Executive Committee

- Establish policies and guidelines on information management.
- Supervise the implementation of policies and practices in a concrete manner.

3.4.1.2 Executives

- Provide rules and regulations to suit the context of the company and be consistent with them.
- Assign a responsible person such as a person responsible for taking care of the information, person responsible for disclosing information, etc.
- Set permissions to access data.

3.4.1.3 Information Technology Department

- Maintain equipment and system for information systems.
- Control access to information systems and networks.
- Secure the information.
- Provide accurate data backup and recovery.

3.4.1.4 Personnel and Administration Department

- Provide advice and educate personnel to ensure strict compliance with the policy.

3.4.1.5 Employees

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- Maintain confidentiality and protect the personal data including the Company's information
- Protect the Company's intellectual property and not infringe on the intellectual property rights of others
- Comply with regulations / policies of the company strictly

3.4.2 Table showing the scope of internal communication (general)

Order	Data	Information Class			Secret Type	Person responsible for maintaining information	Person who approves the disclosure
		1	2	3			
1	Trade secret information such as information about bidding preparation			✓	Confidential information	Sales department	CEO
2	Business Strategic Plan			✓	Confidential information	CEO	CEO
3	Marketing/Product Development Plan			✓	Confidential information	Business Development Department	CEO
4	Business Plan			✓	Confidential information	Business Development Department	CEO
5	Marketing materials (Not publicly disclosed)			✓	Confidential information	Business Development Department	CEO
6	Personal Information			✓	Confidential information	Department of Personnel and Administration	CEO
7	Employee Contract Information / Employee Salary Base			✓	Confidential information	Department of Personnel and Administration	CEO
8	Customer Information			✓	Confidential information	Sales department	CEO

9	Internal Notices / Policies		✓		Controlled Information	Corporate Communications Division	MD
10	Rules/Operation Manual		✓		Controlled Information	Quality Management Department	MD
11	Operations/Meeting Records		✓		Controlled Information	Every employee	MD
12	Company sustainability information	✓			Disclosable information	Investor Relations (IR)	MD
13	Public relations information	✓			Disclosable information	Public Relation	MD
14	Awards or achievements recognized by the Company	✓			Disclosable information	Public Relation	MD

Disclosable information is information that can be disseminated or communicated to the public through all channels.

- Controlled information is information that controls the dissemination of the scope only within the company, which may be promoted via public relations boards, corporate applications (such as Happy Work), email (@gli.co.th), corporate network systems (Drive I), files, documents, etc., It can be distributed to external auditors who have signed a non-disclosure agreement. In the case of other third parties, permission must be obtained from the person responsible for maintaining the information. They will need to issue internal records (MEMO) request approval to disclose information from the authorized person to disclose that information.
- Confidential information is information that is controlled for distribution only to individuals, departments, or committees, or external auditors who have signed a non-disclosure agreement. They may disclose and maintain information via email channels (@gli.co.th), organizational network system (Drive P), access rights to functions in software packages, file cabinets that hold keys by the person responsible for take care of that information.

4. Communication channels

The Company will disclose information through the website of the Stock Exchange of Thailand as specified. In addition, the company may voluntarily disclose information through the Company's website for easy access. Other communication channels of the Company are shareholders' meetings, analysts meeting, Investor Conference, Roadshow, Company Visit and other investor relations activities

- Disclosure through the SET

The company must comply with the rules of the Stock Exchange of Thailand. In disclosing information that is significant to investors' decision-making through SET website, all investors will have equal access to information and if during the period that cannot be disclosed there must be a system to maintain that information to be limited to the people who need it.

- Disclosure through the Company's website

In disclosing information through the website, the Company must comply with the following in all respects.

- 1) Inform investors of information disclosure policy in advance that internal information will be disclosed through the Company's website and comply with the disclosure policy on an ongoing and regular basis. For example, disclose a policy through the SET in the form 56-1 and form 56-2 annually or on the company's website including disclosed through any other media that the Company is using to communicate with investors, etc.
- 2) Must provide information disclosure through the Company's website. All conditions are met as follows

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- Information disclosed is easily readable, such as having a clear heading on the homepage of the website and when looking at the information, the topic can be seen easily and must disclose such information for at least 1 year. The disclosed information must at least be in Thai language.
- People can access and read information at the same time. without having to register or request a Username/Password for viewing information
- Disclosure of information through other channels along with disclosure via the Company's website, for example, there is a notification system or send information to the general public who can apply for the service upon disclosure of internal information which may be sent via Text Message, LINE Application, E-mail or other channels or other channels.
- Do not disclose internal information between 9.00 – 12.30 hrs. and 13.30 – 17.00 hrs. so that the general public has enough time to acknowledge and study such information before the stock exchange open for trading in each session. In addition, there must be a system that is sufficiently and secure to record the import, amend and change the information disclosed through the website. The company has assigned the corporate communication department to manage such information and prevent those without permission from importing or modifying the information that has already been disclosed. This is also Include records of disclosures made through other channels with the website (such as information sent notification of disclosure) by which such systems can store and retrieve such information. and record imports, modifications, and changes for at least 10 years.

5. Confidentiality

Directors, executives, and employees of the Company must not disclose or make use of inside information obtained from performing duties or knowing from other persons to seek benefits for themselves or others. They also have a duty to keep inside information confidential by not letting such information leak or fall to unrelated persons which may cause damage to the Company and the stakeholders of the Company.

Except in the case where disclosure is required by law or in case of business necessity to disclose information to related parties such as independent external auditors, legal advisors, or other consultants, etc. The Company will make a non-disclosure agreement with such entity.

6. Quiet Period

The Company avoids disclosing material information to any person for a period of 30 days prior to the date on which the Company disclose the financial statements to the Stock Exchange of Thailand. Unless there is a necessity that significantly affects the business operations.

7. Investor Relations

Investor relations is a communication channel between the companies, shareholders, or investors. Investor relations is responsible for the preparation of the Company's information as detailed under "Information management" to disclose to relevant investors or public as required or as appropriate.

8. Code of Conduct for Investor Relations

This Code of Conduct does not only apply to Investor Relations but also includes others involved in investor relations work. This includes the authorized person to disclose, or the officer assigned to disclose the information. The said person must act as follows:

- Disclose relevant information accurately and sufficiently to investors in a timely manner.
- Do not disclose information that violate rules and regulations.
- Protect sensitive and confidential information and does not disclose information that is considered inside information.
- Decline from answering inquiries related to quarterly results to third parties 14 days before the earnings report is being disclose to the public (Quiet Period).
- Perform duties with honesty, fairness, and transparency for the benefit of the company and stakeholders and do not use inside information for personal or others gain.

9. Protection Standards for Insider Information

To complete the implementation of this policy, the Company has the following preventive measures:

- (1) Inside information, controlled and confidential information will be limited to access. Only the authorized person such as executives and he/she can decide how much of information they should disclose to the Company's employees. The employee will also notice that this information is confidential and has limitations in its use. Also, it will be reassured that employees are not allow accessing to confidential documents, which will be practice into the corporate culture.
- (2) Establish a security system in the workplace to protect confidential files and documents. In the case of confidential information in electronic form, there is a security system to prevent employees from accessing e-mails, or electronic files.
- (3) Owner of information that has not been disclosed to the public. Those involved must be instructed to strictly follow the information security procedures.

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10. Penalties for violations of the use of inside information

Violation of information disclosure policy will be subjected to disciplinary action, starting from verbal warning, then warning letter, temporary pay cut, suspension without pay, dismissed from work depending on the severity of the violation or even taking legal action, as the case may be.

This communication and disclosure policy becomes effective from 13 May 2021 and scheduled to be reviewed at least every 1 year.

(Mr. Ormsin Chivapruck)

Chairman of the Board

Grandline Innovation Company Limited