

## **Investor Relations Code of Conduct**

VGI Group places high importance on a practice of Investor Relations (IR) function as its key responsibilities deal with communication, public relations and timely disclosure of correct and complete information relating to VGI Group's businesses and performances to all stakeholders including shareholders, individual and institutional investors, analysts, reporters and general public as well as fostering robust confidence and establishing good corporate image. The Board of Directors, therefore, sets up the Investor Relations Code of Conduct as the manual guidance for VGI Group's IR function to align with ethic and good corporate governance with emphasis on the disclosure of information and compliance with relevant laws and regulations strictly, taking into account the interests of the shareholders and stakeholders.

In addition to the compliance with the Company's Corporate Governance Policy and Code of Conduct, all directors, executives and employees involved in IR function shall be required to strictly adhere to this IR Code of Conduct based upon the following principles:

1. Performing their IR duties knowledgably, responsibly and professionally. Professional loyalty, fairness and equal treatment shall be observed and maintained;
2. Strictly complying with the applicable laws, rules and regulations e.g. the Securities and Exchange Commission of Thailand (SEC) and the Stock Exchange of Thailand (SET), as well as, the Company's Articles of Association and relevant policies;
3. Prudently disclosing information, which is significant and necessary for investment decision making, in an accurate, adequate, timely and fair manner to avoid misunderstanding or misinterpreting. Refraining from disclosing information regarded as trade secret or any confidential information, which may prejudice BTS Group's competitiveness;
4. Allowing related parties to access and inquire relevant information;
5. Neither disclosing VGI Group's confidential information nor deploying any inside information, which is not publicly available, for personal gain or for undue gain of others;
6. Promptly and timely responding to queries raised by shareholders, investors, analyst and all stakeholders;
7. Refraining from organising any meeting, or providing any information to investors and analysts 15 days prior to the VGI Group's quarterly financial statements announcement date;
8. Refraining from trading the Company's securities during the Blackout Period as per the Company's Oversight of the Use of Inside Information Policy; and
9. Immediately reporting any non-compliance of the IR Code of Conduct and its impact to the head of IR, Chief Executive Office and/or Board of Directors (as the case may be) upon being aware of such non-compliant incident.

The IR Code of Conduct is an integral part of the Company's Code of Conduct.