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Insider Trading Policy

The Company has a policy and method to prevent directors, executives and employees from using Company insider information which has not yet been disclosed for public use to seek personal gain. This includes trading securities as follows:

1. The Company shall educate directors and executives regarding the duties to prepare and submit a Securities Holding Report of the directors, executives and their spouse or common law partner, and underage children. This includes juristic persons that directors, executives, their spouse or common law partner, and underage children hold shares equaling more than 30% of the total voting rights of such a juristic person. This will be reported to the Securities and Exchange Commission under Section 59 and penalties under Section 275 of the Securities and Exchange Act BE 2535 (which includes the additional amendments) ("Securities and Exchange Act"). This also includes reporting any acquisition or disposal of Company securities under Section 246 and penalties under Section 298 of the Securities and Exchange Act.
2. The Company requires the Company's directors and executives to prepare and submit a Securities Holding Report of the directors, executives, their spouse or common law partner, and underage children. This includes juristic persons that directors, executives, their spouse or common law partner, and underage children hold shares equaling more than 30% of the total voting rights of such a juristic person according to the Securities Holding Form. The report shall be submitted to the Company Secretary prior to submission to the Securities and Exchange Commission each time. The report must be prepared and delivered within 30 days from the date of the appointment as a director and/or executive and each time there is any changes or report any changes in security holdings within 3 business days from the date of purchase, sale, transfer or acceptance of such securities. The Company Secretary is required to summarize the Securities Holding Report and changes of security holdings for the acknowledgment of the Board of Directors' Meeting every 6 months.
3. The Company requires directors and executives, which includes those who hold executive positions in the field of accounting or finance who are department managers or have higher or equivalent positions, as well as any related employees, which includes people who are presumed to know or possess insider information according to the Securities and Exchange Act and have received important insider information which affects the price or the value of the securities to withhold trading, persuading others to

buy or to sell the Company's securities, whether this is done directly or indirectly before the dissemination of financial statements or dissemination of the statement of financial position throughout the embargo period which is a 1 month period before and until the date that the Company announces the quarterly and annual financial performance. The Company will inform the directors and executives in writing to refrain from trading the Company's securities at least 1 month in advance prior to the public disclosure of information and they shall wait at least 24 hours after the public disclosure of information and they shall not disclose any important information to other people.

4. The Company prohibits directors, executives and employees of the Company as well as subsidiaries, which includes persons who are presumed to know or possess insider information in accordance with the Securities and Exchange Act, from using insider information of the Company and subsidiaries which have not been disclosed to the public that could have or may affect the price of the Company's securities. The Company prohibits this knowledge to be used to purchase, sell, offer to buy, offer to sell, or persuade others to buy, sell, offer to buy or offer to sell the Company's securities either directly or indirectly, whether such actions are made for personal gain or the benefit of others or disclosing insider information for others to do such acts, whether doing for the benefits themselves or not.
5. The Company requires directors, executives and employees of the Company as well as the subsidiaries or former directors, executives and employees who have resigned to keep confidential information of the Company and/or insider information of the Company and subsidiaries confidential as well as the confidential information of trade partners and subsidiaries that they attained by performing their duties. They are prohibited to use the confidential information and/or insider information of the Company and subsidiaries as well as the confidential information of the Company's trade partners and subsidiaries for the benefits of other companies or outsiders even if the disclosure of such information will not negatively affect the Company, its subsidiaries or its counterparts.
6. The Company requires directors, executives and employees of the Company and subsidiaries to not disclose insider information of the Company and subsidiaries and to not use their position in the Company and/or subsidiaries or disclose insider information or important information that was attained by performing their duties at the Company and/or subsidiaries which has not yet been disclosed to the public in order to seek benefits in wrong ways or disclose information to outsiders for the benefit of themselves or another person both directly or indirectly regardless of whether or not they receive any benefit or not.
7. The Company requires directors, executives and employees of the Company and its subsidiaries to comply with the insider trading guidelines according to the Securities and Exchange Act and other relevant rules.

8. The Company established a disciplinary punishment for executives and related operators if there is a violation regarding internal trading for personal gain. Discipline begins with a written warning, a cut in wages, and a temporary work suspension without pay or termination. The punishment is determined by the intent of the action and the seriousness of the offense.

--Mrs. Kannikar Chalitaporn--

(Mrs. Kannikar Chalitaporn)

Chairman of the Board of Directors
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