

## **Insider Trading Policy - Myanmar Thilawa SEZ Holdings Public Company Limited (MTSH)**

### **Introduction**

Insider trading poses significant legal and ethical risks to MTSH and its stakeholders. This policy aims to prevent insider trading by establishing guidelines for all employees, including members of the Board of Directors and Senior Executives, who may have access to material non-public information ("inside information").

### **Definition**

Insider trading refers to the purchase or sale of a security while in possession of inside information relating to the security. Inside information is defined as material information that has not been made available to the public.

### **Compliance Requirement**

All employees of MTSH are required to comply with insider trading laws and regulations. This includes refraining from trading securities based on inside information and not disclosing such information to any external party.

### **Prohibited Activities**

It is strictly prohibited for any employee, including members of the Board of Directors and Senior Executives, to engage in insider trading. This includes trading securities of MTSH or any other company while in possession of material non-public information.

### **Confidentiality Obligation**

Employees who have access to material information that may affect the value of MTSH are obligated to maintain strict confidentiality. They must not disclose such information to anyone outside the company, including family members, friends, or business associates.

## **Consequences of Violation**

Violation of this Insider Trading Policy may result in severe consequences, including but not limited to:

- a. Company-imposed sanctions, such as removal or dismissal for cause.
- b. Legal action and prosecution under applicable securities laws.
- c. Reputational damage to both the individual and MTSH.

## **Reporting Obligation**

Employees who become aware of any potential insider trading activity or violations of this policy are required to report such incidents to the Compliance Officer or designated authority immediately.

## **Protection of Stakeholder Interests**

MTSH is committed to protecting the interests of its stakeholders from any harm caused by insider trading. The company will take all necessary measures to prevent and address any instances of insider trading.

## **Training and Awareness**

MTSH will provide regular training and awareness programs to educate employees about insider trading laws and the importance of compliance with this policy.

## **Amendments**

This Insider Trading Policy may be amended from time to time by the Board of Directors of MTSH to ensure its effectiveness and compliance with relevant laws and regulations.

## **Conclusion**

Compliance with this Insider Trading Policy is essential to uphold the reputation and integrity of MTSH and to ensure fair and transparent trading practices. All employees are expected to adhere to the principles outlined in this policy at all times.