INTOUCH

Market Disclosure Policy

Intouch Holdings Plc

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1 Introduction

1.1 Intouch Holdings Plc (or "the Company") is committed to providing the shareholders and the investors with accurate, adequate, timely and equal access to information, in accordance with legal and regulatory requirements in order to promote investor confidence in the integrity of the Company.

1.2 As a listed company on the Stock Exchange of Thailand ("the SET"), the Company is subject to regulations governing the timely disclosure of information which may affect the price or value of its securities or influence decisions taken by investors to buy or sell its securities. Failure to strictly comply with this policy may result in serious civil or criminal liability for the Company and its executives and could damage the Company's reputation.

2 Principles of Disclosure of Information

In disclosing information, the following principles must be followed:

(1) *Compliance with all legal and regulatory requirements on disclosure*

Disclosure of corporate information shall be in compliance with applicable legal and regulatory requirements.

(2) *Transparency and accountability*

Disclosure of all corporate information shall be accurate, adequate, timely and consistent, regardless of whether it has a positive or negative impact on the Company, the investors or the market.

(3) *Fair and equitable access to information*

All material non-public information shall be disclosed in a manner which ensures fair and equitable access by all investors. Selective disclosure of such information to specific individuals or groups is prohibited at all times.

3 Purpose

This policy is intended to:

(1) Assist the Company to fulfill its reporting obligations required by:

i. *The Regulation of the Stock Exchange of Thailand (Bor.Jor./Por.11-00) Re: Rules, Conditions and Procedures Governing the Disclosure of Information and Other Acts of a Listed Company.*

ii. *The Notification of the Stock Exchange of Thailand (Bor.Jor./Por.23-00) Re: Guidelines on Disclosure of Information by Listed Companies.*

(2) Enable the Company to provide investors with information in the manner expected of listed companies so the investors can make an informed valuation of the Company's securities.

4 Scope

4.1 This policy applies to all executives and employees of the Company and its subsidiaries, those authorized to speak on the Company's behalf, and anyone else inside the organization.

4.2 This policy covers disclosures in documents filed with the SET, financial and non-financial disclosures, management discussion and analysis of financial results of operations (MD&A), written statements published in the Company's annual and quarterly reports, news releases, letters to shareholders, presentations by senior management, and all information posted on the Company's website or disseminated through other electronic communication.

4.3 This policy extends to oral statements made in meetings and telephone conversations with analysts and investors, interviews with the media, public speeches, press conferences, and conference calls.

4.4 Public relations disclosures (e.g. about corporate social responsibility, product or service promotions, or events organized by the Company) are excluded from this policy because they are part of everyday business promotional activity.

5 Responsibility and Spokespersons

5.1 The Chief Executive Officer ("CEO") /Company President shall be responsible for implementing and monitoring this policy to ensure that the Company complies with its disclosure obligations. The CEO/Company President is the ultimate decision-maker on whether or not to disclose any particular information.

5.2 The Chief Financial Officer ("CFO"), Head of Compliance, Head of Investor Relations and Company Secretary shall provide support to the CEO/Company President to ensure that the Company complies with its disclosure obligations.

5.3 The CEO/Company President, CFO and Head of Investor Relations are designated the Company's authorized spokespersons to provide information regarding INTOUCH and its subsidiaries to the media, analysts and investors.

On specific occasions an authorized spokesperson can delegate another person to speak on his or her behalf, but any comments must be limited to that delegate's area of expertise.

5.4 If any other executive or employee receives a request from an investor or the media to comment on any matter concerning the Company, they must reply that they are not authorized to speak on the Company's behalf, and then refer the inquiry to Investor Relations or Corporate Affairs.

6 Disclosure of Material Information

6.1 The Company's obligation

6.1.1 The Company has an obligation under SET regulations to keep the Stock Exchange fully informed of any information that may have a material effect on the price or value of the Company's securities or on the shareholders' interests.

6.1.2 Specific examples of a company's affairs or market conditions requiring prompt disclosure are listed below:

i. A joint venture, consolidation or acquisition.

ii. The declaration or omission of dividends or the determination of earnings.

iii. Any change in a share's par value or payment of a dividend in shares.

iv. The acquisition or loss of a significant commercial contract.

v. A significant new product or development of a resource, technology, product or market, or a significant discovery concerning a natural resource.

vi. Any change in control of the Company or a significant change in its management.

vii. A call to redeem securities.

viii. The borrowing of a significant amount of funds.

ix. The issuance of a significant amount of new shares for sale to the general public or any individual.

x. Significant litigation.

xi. The purchase or sale of a significant asset.

xii. Any significant change in capital investment plans.

xiii. Any significant change in the Company's objectives.

xiv. A significant labor dispute or legal dispute with a sub-contractor or supplier.

xv. A tender offer for another company's securities.

xvi. A significant change in accounting policy.

Note: These examples are not an exhaustive list. When making disclosure decisions, SET Regulation (Bor.Jor./Por.11-00) Re: Rules, Conditions and Procedures Governing the Disclosure of Information must be used as a reference.

6.1.3 In the following circumstances the Company may temporarily refrain from publicly disclosing material information, provided that complete confidentiality is maintained:

i. Immediate disclosure would prejudice the ability of the Company to pursue its corporate objectives.

ii. A situation is in a state of flux and a more appropriate moment for disclosure is imminent.

iii. Immediate disclosure would significantly benefit the Company's competitors.

6.2 Disclosure procedure

6.2.1 The CFO and Head of Compliance have the primary responsibility to determine whether information is required to be disclosed to the SET; if so, an appropriate release will then be prepared for the CEO/Company President's approval.

6.2.2 The CEO/Company President, in consultation with appropriate personnel, is the ultimate decision-maker on whether or not to disclose information, and must take all the necessary steps, such as requesting a trading halt, to prevent a false market and protect confidentiality.

6.2.3 The CEO/Company President may consult with the Chairman of the Board and other directors concerning the disclosure of material information. The CEO/Company President must ensure, wherever possible, that adequate time is allowed for the directors to thoroughly consider each matter and have their concerns addressed.

6.3 Release of information to the SET and general public

6.3.1 The Company must not publicly disclose material price-sensitive information until it has notified the SET and received an acknowledgment that the information has been released to the Stock Exchange. After that, the information disclosed should be promptly posted on the Company's website in compliance with this policy.

6.3.2 Copies of all disclosures to the SET must be sent to all of the Company's directors by Company Secretary.

6.4 Market rumors or false markets

6.4.1 It is the Company's policy not to comment on market rumors or speculation, particularly where it is clear that the Company is not the source of the rumor.

6.4.2 The Company may, however, respond to rumors or speculation under certain circumstances, such as a request from the SET or a securities regulator, or if the Company determines that a response is appropriate.

6.4.3 The CFO and Head of Compliance will consider the nature and content of any response to rumors or speculation and make a recommendation to the CEO/Company President.

6.5 Trading halts

6.5.1 If the Company is about to make a disclosure of material information, it may be necessary to request a halt in trading of the Company's securities in order to release all the information to the market in a fair and transparent manner.

6.5.2 The CEO/Company President will make all decisions in relation to trading halts. No executive or employee is authorized to seek a trading halt unless he or she has approval from the CEO/Company President.

7 Market Communication

7.1 Communication with investors

7.1.1 The Company may hold individual or group meetings with investors to discuss information that has been released to the SET.

7.1.2 The Company's policy for conducting meetings is not to discuss any material price- or value-sensitive information unless that information has already been released to the public.

7.1.3 If a question relating to material non-public information is raised in a meeting, executives or employees must decline to answer, or take the question on notice and wait until the Company releases the information to the public through the SET.

7.1.4 If any executive or employee participating in a meeting considers that a matter has been raised that might constitute a previously undisclosed material price- or value-sensitive matter, they must immediately report this to the CFO or Head of Compliance.

7.1.5 The Head of Investor Relations is responsible for all primary investor contact.

7.2 Briefing materials

Any written materials to be used at individual or group meetings with investors, or speeches by executives must be reviewed by Investor Relations to determine whether they contain new non-public material information.

7.3 Earnings guidance and other forward-looking information

7.3.1 The Company may from time to time provide earnings guidance or other forward-looking information in its annual and quarterly MD&A to enable the investment community to better evaluate the Company and its prospects.

7.3.2 All material assumptions used in the preparation of earnings guidance or forward-looking information must be accompanied by a statement that identifies the risks and uncertainties that may cause actual results to differ materially from projected ones.

7.3.3 If any unforeseen event or circumstance is reasonably likely to cause future results to differ materially from any previously announced earnings guidance or forward-looking information, or if the Company decides to retract a previous statement (including assumptions that are no longer valid), the Company will disclose this and state the expected difference in its MD&A or through the SET and provide an explanation for its decision.

7.3.4 All earnings guidance or other forward-looking information must be approved by the Board of Directors prior to its publication.

7.4 Analyst reports and forecasts

7.4.1 The Company may review, upon request, analysts' draft research reports or models for accuracy based on publicly-disclosed information. The Company may question an analyst's assumptions if his or her estimates differ significantly from the range predicted by other analysts or the earnings guidance published by the Company.

7.4.2 Any response to an analyst's inquiry must be limited to material and accurate information that has already been publically disclosed.

7.4.3 The Company must not endorse, or be seen to endorse, analyst reports or the information they contain. Accordingly, the Company will not:

i. Externally distribute individual analyst projections or reports.

ii. Refer to individual analyst recommendations on its website.

iii. Selectively refer to specific analysts, or publicly comment on individual analyst recommendations or proprietary research.

7.4.4 The Company may post the names of analysts and their firms currently covering the Company on the Investor Relations section of its website.

7.5 Quiet period

7.5.1 In order to ensure fairness and prevent improper disclosure of information that might affect the Company's stock price while the financial statements are being prepared, the Company observes a fourteen (14) days quiet period prior to its planned earnings release.

7.5.2 During the quiet period, the Company refrains from commenting on or answering questions regarding business performance, while access to authorized individuals (spokespersons) is restricted unless it relates to factual clarification of disclosed information, long-term business operations or unforeseen events that might have an impact on the Company's share price.

7.5.3 The quiet periods of the current year are posted on the Company's website calendar.

7.6 The Company's website

7.6.1 The Company's website (www.intouchcompany.com) is used as a public forum for presenting information in line with this policy.

7.6.2 All material information is posted on the Investor Relations page of the Company's website as soon as it has been released to the SET. This includes the annual report, quarterly reports, supplemental quarterly financial information, and the annual shareholders' meeting minutes. Other documents of interest are posted upon availability along with presentations made by the Company's executives.

7.6.3 The Investor Relations Department is responsible for updating its page on the Company's website and monitoring all information posted on it to ensure that it is accurate, up-to-date, and in compliance with this policy.

7.6.4 The Company does not allow any links on its website to the sites of analysts commenting on the Company and its subsidiaries.

7.7 Chat rooms and social networking sites

All the Company's executives and employees are prohibited from participating in chat rooms, social media sites or newsgroup discussions on matters pertaining to the Company's activities or securities under the purposes of this policy, unless they have been granted specific authorization by the CEO/Company President and follow the principles laid out in this policy.

7.8 Use of mandatory disclaimers

7.8.1 All earnings guidance or forward-looking statements about financial performance, conference calls and presentations to the investment community must include a standard disclaimer in order to warn investors that actual results could differ materially from predicted ones, and to protect the Company from any liability.

7.8.2 A standard disclaimer must also be included at the end of any news release that contains forward-looking statements or important facts that might cause actual results to differ materially from predicted ones.

7.8.3 All standard disclaimers must be approved by the Legal Department before they are used. The Company's current disclaimers are set out in the appendix to this policy.

8 Maintaining Confidentiality

All the Company's executives or employees privy to confidential information are prohibited from communicating this to any other person, unless it is necessary to do so in the normal course of business when access must be limited on a need-to-know basis.

9 Policy Violation

Any executive or employee who violates this policy may face disciplinary action up to and including termination of his or her employment.

10 Relevant Related Policies

The following related documents should be consulted during any disclosure of information:

i. The Company's Corporate Governance Policy

ii. The Company's Code of Conduct

iii. The Company's Information Security Policy

11 Maintenance and Promotion

The Compliance Department and Investor Relations Department must review this policy and related procedures on an annual basis, and coordinate with the Human Resources Department to arrange training programs to ensure that all executives and employees are aware of the Company's disclosure obligations and all other requirements under this policy.

This policy became effective on November 8, 2022.

(Mr. Kan Trakulhoon)
Chairman of the Board of Directors
Intouch Holdings Plc

Appendix

Disclaimer Clause

Some statements made in this presentation are forward-looking statements with the relevant assumptions, which are subject to various risks and uncertainties. These include statements with respect to our corporate plans, strategies and beliefs and other statements that are not historical facts. These statements can be identified by the use of forward-looking terminology such as "may", "will", "expect", "anticipate", "intend", "estimate", "continue" "plan" or other similar words.

The statements are based on our management's assumptions and beliefs in light of the information currently available to us. These assumptions involve risks and uncertainties which may cause the actual results, performance or achievements to be materially different from any future results, performance or achievements expressed or implied by such forward-looking statements. Please note that the company and executives/staff do not control and cannot guarantee the relevance, timeliness, or accuracy of these statements.

ข้อความปฏิเสธความรับผิดชอบ

ในเอกสารฉบับนี้ อาจจะมีข้อมูลบางส่วนที่เกี่ยวข้องกับการคาดการณ์ในอนาคตโดยใช้ปัจจัยที่เกี่ยวข้องในหลายด้าน ซึ่งจะขึ้นอยู่กับความเสี่ยงและความไม่แน่นอนต่าง ๆซึ่งข้อมูลดังกล่าวรวมถึง แผนธุรกิจ กลยุทธ์และความเชื่อของบริษัทฯ รวมทั้งข้อมูลอื่นที่ไม่ใช่ข้อมูลที่เกิดขึ้นในอดีต ตัวอย่างของคำที่ใช้ในการคาดการณ์ในอนาคต เช่น "อาจจะ", "จะ", "คาดว่า", "ตั้งใจว่า, "ประมาณ", "เชื่อว่า", "ยังคง", "วางแผนว่า" หรือคำใดๆ ที่มีความหมายทำนองเดียวกัน เป็นต้น

แม้ว่าการคาดการณ์ดังกล่าวจะถูกจัดทำขึ้นจากสมมุติฐานและความเชื่อของฝ่ายบริหาร โดยอาศัยข้อมูลที่มีอยู่ในปัจจุบันเป็นพื้นฐานก็ตาม สมมุติฐานเหล่านี้ยังคงมีความเสี่ยงและความไม่แน่นอนต่างๆ ซึ่งอาจจะทำให้ผลงาน ผลการดำเนินงาน ความสำเร็จที่เกิดขึ้นจริงแตกต่างจากที่บริษัทฯ คาดการณ์ไว้ในอนาคต ดังนั้นผู้ใช้ข้อมูลดังกล่าวจึงควรระมัดระวังในการใช้ข้อมูลข้างต้น อีกทั้งบริษัท และผู้บริหาร/พนักงาน ไม่อาจควบคุมหรือรับรองความเกี่ยวข้องระยะเวลาที่จะเกิดขึ้น หรือความถูกต้องของข้อมูลดังกล่าวได้