(Translation)

Securities Holding and Trading Policy for Directors and Executives

1. introduction

Lease IT Public Company Limited (the "Company") is committed to treating all shareholders with transparency and fairness, in accordance with the principles of good corporate governance. To fulfill this commitment, the Board of Directors has established and implemented the Securities Trading Policy for Directors and Executives to serve as a guideline for future practices.

2. Objective

The purpose of this policy is to:

(1) Establish criteria and guidelines regarding the securities trading of the Company's directors, executives, and auditors.

(2) Encourage the Company's directors, executives, and auditors to comply with the Securities and Exchange Act B.E. 2535 (1992) ("the Securities and Exchange Act") regarding insider trading, as well as the notifications of the Office of the Securities and Exchange Commission ("the SEC Office") concerning the reporting of securities holdings by directors and executives of listed companies.

(3) Maintain the confidence of shareholders and investors in the Company's securities.

3. Scope

(1) This policy applies to the Company's directors, executives, and auditors. Furthermore, certain sections of this policy also extend to the spouses and minor children of the aforementioned individuals.

(2) This policy covers the trading of securities of the Company and its subsidiaries (if any) listed on the Stock Exchange of Thailand (SET) or the Market for Alternative Investment (mai), collectively referred to as "Securities of the Company's Group."

4. Definition

Any words or expressions in this policy shall have the meanings assigned below, unless the context otherwise indicates or explains:

(1) "Policy" means the Securities Trading Policy for Directors, Executives, and Auditors.

(2) "the Company" means Lease IT Public Company Limited.

(3) "Securities" means shares (common and preferred shares) and convertible securities, which include debentures, convertible debentures, warrants, transferable subscription rights ("TSR"), stock options, derivatives (such as futures and options), and any other financial instruments tradable in financial markets.

(4) "Trading" means the purchase, sale, transfer, or acceptance of transfer of securities and/or any legal benefits therein, including the exercise of stock options, warrants, or convertible debentures.

(5) "Short Sale" means the sale of securities that the seller does not currently own or possess, but instead borrows from another party who holds those securities, such as a broker.

(6) "Inside Information" means material information that could influence decisions regarding the trading of securities and has not yet been disclosed to the public. Examples of inside information include:

  a) Financial position and operating results
  b) Financial projections

c) The declaration or non-declaration of dividends
d) Any changes to the Company's credit rating
e) Any changes to the par value of the Company's securities
f) The call or redemption of securities
g) Business plans that impact the interests of the Company
h) Significant changes in investment plans or investment projects
i) Joint ventures, mergers and acquisitions, or divestitures
j) Making a tender offer for securities of another company
k) The acquisition or disposal of material assets
l) Information on significant new products
m) The acquisition or loss of significant commercial contracts
n) Significant legal disputes
o) Amendments to the Company's objectives
p) Changes in significant accounting policies
q) Changes in control or significant changes in the Board of Directors or executive management

(7) "Director" means a director of the Company.

(8) "Executive" means the Managing Director / Chief Executive Officer, the first four executive positions ranking immediately below the Chief Executive Officer, and shall include any person holding an executive position at the departmental manager level or equivalent in the accounting or finance departments of the Company (in accordance with the definition prescribed by the Securities and Exchange Commission).

(9) "Auditor" means the auditor appointed by a resolution of the Company's Annual General Meeting of Shareholders each year.

(10) "Designated Person" means any person holding a position or duty who has access to or possesses inside information of the Company (including the spouse and minor children of such person).

In this regard, the Company Secretary shall be responsible for maintaining the registry of Designated Persons and notifying such individuals upon being added to or removed from the registry.

5. Duties and Responsibilities

(1) The Board of Directors has delegated the duty to the Managing Director to oversee this Policy to ensure that all Designated Persons strictly comply with its provisions.

(2) The Company Secretary is primarily responsible for implementing this Policy, monitoring its effectiveness, providing clarifications, answering inquiries, and interpreting its provisions in case of doubt.

(3) Executives are responsible for ensuring that their subordinates are aware of the importance of and thoroughly understand this Policy, as well as strictly comply with its requirements.

(4) Directors, Executives, and Auditors must strictly comply with this Policy, and are required to communicate its provisions to their spouses and minor children for their awareness and compliance.

6. Policies and Guidelines

6.1 Prohibition on Insider Trading Directors, Executives, and Auditors must strictly comply with the prohibition on insider trading as prescribed under the Securities and Exchange Act. The law stipulates that in the purchase or sale of securities listed on the Stock Exchange of Thailand (SET) or traded on a securities trading center, no person shall purchase, sell, offer to purchase, offer to sell, or invite any other person to purchase, sell, offer to purchase, or offer to sell such listed or traded securities, whether directly or indirectly, in a manner that is likely to take advantage of outsiders by relying on material facts concerning changes in the price of securities that have not yet been disclosed to the public, which such person has come to know through their position or status. This prohibition applies regardless of whether such act is committed for their own benefit or for the benefit of others, or whether such facts are disclosed to enable others to act in such manner in exchange for returns or benefits.

6.2 Blackout Period

6.2.1 Designated Persons are prohibited from trading the Company's securities during the 30 day period prior to the disclosure of quarterly and annual financial statements, and within 24 hours after the disclosure of such financial statements, as well as during any other periods that the Company may specify from time to time

6.2.2 Under exceptional circumstances, a Designated Person may sell the Company's securities during a Blackout Period if they encounter situations such as severe financial hardship, or are required to comply with statutory requirements or court orders. In such events, a memorandum stating the reasons must be prepared and submitted for approval to:

(1) The Chairman of the Board (in the case where the seller is a Director or the Company Secretary).

(2) The Chairman of the Audit Committee (in the case where the seller is the Chairman of the Board).

(3) The Chief Executive Officer / Managing Director (in the case where the seller is a Designated Person who is neither a Director nor the Company Secretary). A copy of such memorandum shall also be submitted to the Company Secretary.

6.2.3 The Company Secretary shall announce the Blackout Period to Designated Persons in advance.

6.3 Reporting of Securities Holdings

6.3.1 Initial Reporting

(1) Directors, Executives, and Auditors of the Company are required to prepare a report on the securities holdings of themselves, their spouses, and minor children, using Form 59-1 of the Office of the Securities and Exchange Commission (SEC). This report must be submitted to the Office of the SEC within 30 days from the date of appointment as a Director, Executive, or Auditor of the Company, or from the closing date of the public offering of securities, as prescribed under the Securities and Exchange Act.

(2) Designated Persons other than Directors, Executives, and Auditors are required to prepare a report on the holdings of the Group Company's securities, and submit it to the Company Secretary within 30 days from the date of receiving notification from the Company Secretary.

6.3.2 Reporting of Changes

(1) Directors, Executives in the first four positions ranking immediately below the Chief Executive Officer, and Auditors of the Company are required to prepare a report on changes in securities holdings using Form 59-2 of the Office of the SEC. This report must be submitted to the Office of the SEC within 3 business days from the date of purchase, sale, transfer, or acceptance of transfer of securities, as prescribed under the Securities and Exchange Act.

(2) Designated Persons other than Directors, Executives, and Auditors are required to prepare a report on changes in the holdings of the Group Company's securities, and submit it to the Company Secretary within 3 business days from the date of purchase, sale, transfer, or acceptance of transfer of securities.

6.3.3 Exceptions

Changes in securities holdings under the following circumstances are exempt from the requirement to submit Form 59-2:

(1) The offering of new shares to existing shareholders in proportion to their respective shareholdings (Rights Offering).
(2) The exercise of rights under convertible securities.
(3) The offering of shares or the exercise of rights under newly issued warrants or convertible debentures to directors or employees of the Company (Employee Stock Option Program or "ESOP"), or the acquisition of securities under an Employee Joint Investment Program ("EJIP").
(4) The acquisition of securities through inheritance.
(5) The transfer or acceptance of transfer of securities arising from the placement of securities as collateral for derivatives trading.

6.4 Securities Trading Exempt from this Policy

This Policy does not apply to the acquisition of securities or the acceptance of a tender offer for a corporate takeover (Tender Offer).

6.5 Other Restrictions on Securities Trading

6.5.1 The Company encourages Designated Persons to invest in the Company's securities for the long term. In this regard, short-term or speculative trading in the Company's securities should be avoided.

6.5.2 Designated Persons should avoid engaging in the following transactions:

(1) Short selling of the Company's securities, which may signal to the market that the seller lacks confidence in the Company.
(2) Trading in derivatives (such as futures and options) related to the Company's securities, which may potentially lead to insider trading.
(3) Holding the Company's securities in a margin account, which may result in a forced sale of such securities by the securities company without consent in the event that additional collateral cannot be provided.

7. Penalties for Policy Violation

Any director, manager, executive, or auditor who violates or fails to comply with the securities trading rules prescribed under the law on securities and exchange shall be subject to the penalties stipulated by such law.

(Note: This document is an English translation of the original Thai version. In the event of any discrepancy or conflict between the English translation and the Thai original, the Thai version shall prevail in all respects.)