

Policy and Guidelines

The Use of Inside Information

HARN has defined guidelines in its Corporate Governance Policies and Principles for director, executives and employees on best practices on the use of inside information and guarding of confidential information. They must guard HARN's inside information or confidential information not yet publicly available and must not share with other parties inside information learned during the course of their duties or use it to seek profit in a fraudulent way, or to cause damage to HARN's interests.

In addition, HARN has a policy for the Board and the first 4 top-ranking executives with privilege to inside information to refrain from insider trading of HARN stocks within 30 days prior to the disclosure of quarterly and yearly financial statements to the public and until the period of 24 hours since disclosure to the public. Other than that, trading it normally. They must report such trading to the Company Secretary at least 1 day in advance.

However, the Board and the first 4 top-ranking executives will be reminded to refrain from using inside information through email by January of every year.

Conflicts of Interest

HARN requires information disclosure to prevent conflicts of interest and illegal, improper activities. Under the Board's policy, business decisions made by all level executives must be solely in HARN's best interests. Executives must not only avoid engaging in financial and other relationships with external parties that would lead to financial losses for HARN or a conflict of loyalty or interest, but must also not compromise the efficiency of business operations. Those person with interests or related businesses which may require HARN's review and decisions must report their relationships and connection with potential conflicts of interest. HARN is to disallow such connected persons from exercising their authority for and involvement in such transactions.

- (1) HARN has required the directors and a to disclose potential conflicts of interest to HARN by February of every year. The Company Secretary is to compile to check and manage conflicts of interest.
- (2) Define at every board meeting, the Chairman reminds directors to conform to the policy on conflicts of interest on all agenda items, which requires those with vested interests to declare themselves to the meeting to abstain from voting or giving any views and minute recorder.
- (3) As part of the oversight of inside-information measures, all director and the first 4 top-ranking executives, including their spouses and children under legal age, must report any changes in their HARN share ownership to the Company Secretary at least 1 day in advance and report to SEC under Article 59 of the Securities and Exchange Act B.E. 2535 (1992) and its amendments within 3 days of the date of sale, purchase, disposal, or receipt of such shares. HARN defines a policy of disclosing or reporting the sale, purchase, disposal, or receipt of such shares, changes in share ownership of the director and the first 4 top-ranking executives to the Board meeting, contained in advance as a regular agenda item.
- (4) The Audit Committee reviews related transactions and those with potential conflicts of interest that could undermine HARN's businesses to ensure conformance to the law and SET's criteria. All of which must be reported to the board for approval.