Insider Trading Policy and Procedures

Regional Container Lines Public Company Limited

1. Policy Statement and Purpose

Insider trading erodes the confidence of investors and is antithetical to market fairness and efficiency. Regional Container Lines Public Company Limited ("RCL" or the "Company") is committed to treating all shareholders and investors equitably and to ensuring that inside information is not misused. This Policy sets out the rules and procedures for the protection and use of inside information and for trading in the Company's securities, in accordance with the Securities and Exchange Act B.E. 2535 (as amended) (the "SEC Act"), the regulations of the Securities and Exchange Commission (the "SEC") and the Stock Exchange of Thailand (the "SET"), and good corporate governance practices.

2. Scope

This Policy applies to directors and executives of the Company and their Related Persons, and to Designated Persons (together, "Covered Persons"). The prohibitions in Section 4 and Section 5(1)(b) and the confidentiality obligation in Section 5(5) apply to any person who comes into possession of inside information, including other employees of the Company and its subsidiaries and external parties such as auditors, legal and financial advisors, consultants and counterparties, as required by law.

3. Definitions

"Insiders" means all persons who come into possession of material inside information before its public release. For this purpose, insiders include controlling shareholders, directors, executives, managers and employees of the Company and its subsidiaries, and their Related Persons, parents and siblings; persons who have access to inside information by virtue of their duties or position, such as auditors, legal, and financial advisors, consultants and counterparties; and any person who receives inside information from any of the foregoing.

"Related Persons" means, in relation to any person, his/her spouse or cohabiting partner, his/her minor children, and any juristic person in which such persons hold, in aggregate, more than 30% of the total voting rights and are the largest shareholders, in accordance with Section 258 of the SEC Act.

"Executives" means "executives" as defined in the notifications of the SEC, namely the President, being the holder of the highest management position of the Company, however titled (the "President"), the first four persons holding executive positions below the President, all persons holding a position equivalent to the fourth executive position, and the highest-ranking person in charge of accounting or finance at the level of department manager or above.

"Securities" means shares, debentures, warrants and other securities issued by the Company, and derivatives whose underlying asset is such securities.

"Designated Persons" means employees of the Company and its subsidiaries who have access to inside information by virtue of their duties, either on a regular basis (such as staff in finance, accounting, investor relations, corporate strategy, legal and the offices of directors and executives) or in connection with a specific project or transaction, as designated by the President or the Company Secretary from time to time. A project-based designation ends when the relevant information has been disclosed to the public or the project is terminated.

"Covered Persons" means directors and executives of the Company and their Related Persons, and Designated Persons.

"Inside information" means any information that has not been disclosed to the public and that is material to changes in the price or value of the Company's securities, such as financial results, dividend decisions, acquisitions or disposals of assets, mergers, capital increases or decreases, significant contracts, and changes in control or management. Such information is intended for use solely for a corporate purpose and not for any personal use.

"Insider trading" refers to the misuse of inside information for one's own benefit or the benefit of others. It includes:

(1) Trading (purchase or sale) of the Company securities by a person who knows or is in possession of inside information, whether for his/her own account or for others, and regardless of whether he/she makes the trading in his/her own name.

(2) Offering to purchase or sell, or inducing any other person to purchase, sell, offer to purchase or offer to sell the Company's securities while in possession of inside information.

(3) Disclosure of inside information to any other person, directly or indirectly, where the discloser knows or should have known that the recipient may use such information to trade in, or to induce others to trade in, the Company's securities.

4. General Prohibition

RCL supports efforts to prohibit insider trading, in the belief that it offends basic notions of fairness and jeopardises the integrity of the open market. This notion of fairness rests on the principle that insiders should not have an undue advantage over other investors in the market.

Accordingly, the SEC Act and this Policy prohibit insiders, directly or indirectly, including through their families or other persons, from purchasing or selling the Company's securities while in possession of inside information.

To avoid even the appearance of impropriety, this policy also prohibits Covered Persons from trading in the Company's securities during the blackout periods set out below, including for a period after material information has been disclosed, sufficient to permit evaluation of the information by investors.

5. Guidelines / Procedures

The following guidelines/ procedures shall be observed and complied with Covered Persons, except where otherwise stated:

(1) Blackout periods

(a) Covered Persons are prohibited from trading in the Company's securities during the period from 30 days before the publication of the Company's quarterly and annual financial statements until 48 hours after such publication;

(b) any person who becomes aware of other inside information is prohibited from trading in the Company's securities from that time until 48 hours after such information has been disclosed to the public through the SET. The Company Secretary shall notify directors, executives and Designated Persons of each blackout period in advance; and

(c) Exempt transactions: The blackout period under (1)(a) does not apply to transactions that do not involve an investment decision by the Covered Person, such as acquisitions by inheritance or gift, subscriptions for securities offered to all shareholders in proportion to their holdings, and the exercise of warrants or rights under an employee stock option programme (but not any subsequent

sale of the securities so acquired), or other transactions of a similar nature as determined by the Company Secretary, provided that the person does not use inside information.

(2) Designated Persons shall report their trading in the Company's securities, whether directly or indirectly to the Company Secretary upon request.

(3) Reporting under Section 59

Directors and executives shall report their holdings of the Company's securities, including those of their Related Persons, to the SEC in accordance with Section 59 of the SEC Act, in the form and manner prescribed by the SEC: an initial report within 30 days of being appointed as a director or executive, and a report on any change in holdings within 3 business days of any purchase, sale, transfer or acceptance of transfer of the Company's securities. A copy of each report shall be sent to the Company Secretary on the same day it is submitted to the SEC.

(4) Reporting to the Board and disclosure

The Company Secretary shall compile the reports under (2) and (3) and report changes in the holdings of the Company's securities by directors and executives to the Board of Directors at every quarterly Board meeting. The Company shall disclose this Policy, its implementation, and the holdings of directors and executives (including their Related Persons) as at the beginning and end of the year in its Form 56-1 One Report.

(5) Confidentiality

All directors, executives and employees of the Company and its subsidiaries, and any other person who comes into possession of inside information, shall keep inside information strictly confidential, disclose it only on a need-to-know basis, and shall not use it for their own or others' benefit. This obligation continues after they cease to hold office or employment. For significant projects, the responsible department shall maintain a list of persons with access to inside information, and external parties receiving inside information shall be required to sign confidentiality agreements. Only persons authorised by the Company may disclose information to the public.

(6) Communication and acknowledgement

The Company shall communicate this Policy to directors, executives and Designated Persons, who shall sign an acknowledgement upon appointment or designation and upon any revision of this Policy, and shall provide them with training and periodic reminders, including before each blackout period. The Company shall also inform all other employees of the prohibitions and confidentiality obligations under this Policy through its regular internal communication channels, such as orientation programmes and the Company's website.

(7) Penalties

The Company takes a serious view of such matters. Any employee, whether or not a Covered Person, found to have acted against this Policy shall be subject to investigation and disciplinary action, and where deemed appropriate, up to and including termination of employment.

Violations by directors shall be considered by the Board of Directors. In addition, insider trading is an offence under Sections 241 and 242 of the Securities and Exchange Act B.E. 2535 (as amended), which may result in criminal penalties and civil sanctions, including civil fines, disgorgement of benefits and prohibition from serving as a director or executive of a securities issuer.

(8) Whistleblowing

Any person who becomes aware of a possible violation of this Policy may report it through the Company's whistleblowing channels. Persons reporting in good faith shall be protected in accordance with the Company's whistleblowing policy.

6. Responsibilities and Review

This Policy is approved by the Board of Directors in its Meeting No. 6/2026 on 6 November 2026 and effective from 6 November 2026 onwards or until there is another resolution. The Company Secretary is responsible for monitoring compliance, maintaining records of notifications and reports, and reporting to the Board of Directors. The Board of Directors shall review this Policy and whenever there are material changes in the applicable laws or regulations.

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(Dr. Jamlong Atikul)
Chairman of the Board of Directors

Revision Record of the Insider Trading Policy and Procedures

Version No.	Date of Approval	By	Description and Reason
1	7 April 2006	-	To comply with Securities and Exchange Act B.E. 2535
2	6 November 2026	Corporate Secretary Department	To comply with the Securities and Exchange Act B.E. 2535 (as amended), the regulations of the Securities and Exchange Commission and the Stock Exchange of Thailand, and good corporate governance practices