

**INDORAMA VENTURES PCL**

**POLICY ON INTERNAL INFORMATION CONTROL  
&  
USAGE OF INSIDE INFORMATION**

*(As approved in the Board of Directors Meeting No.1/2009 dtd 29/09/2009)*

## Indorama Ventures Public Company Limited

### Policy on Internal Information Control and usage of Inside Information

The Policy on Internal Information Control and usage of Inside Information of the Company:

- 1) All directors, executives, staff and employees of the Company shall keep confidential and/or internal, all information of the Company except for the purpose of the operation of the Company's businesses;
- 2) All directors, executives, staff and employees of the Company shall not disclose confidential and/or internal information of the Company with the aim to seek benefit for oneself or for other persons either directly or indirectly regardless of whether or not such benefit is to be received; and
- 3) All directors, executives, staff and employees of the Company shall not sell, purchase, transfer or take the assignment of securities of the Company by using confidential and/ or internal information of the Company and/ or enter into any transactions by using confidential and/or internal information of the Company in a manner that could possibly cause damage to the Company either directly or indirectly. This provision shall also apply to spouses and minor children of the directors, executives, staff and employees of the Company. Violators of the regulations shall be deemed as committing a serious offence.

After the shares of the Company have been listed on the Stock Exchange of Thailand (“SET”), directors, executives, managers, person responsible for the operation, auditor, staffs or employees of the Company purchase or sell, offer to purchase or sell or invite any other person to purchase, sell or offer to purchase or sell the shares of the Company in such a way as to take advantage of other persons by using internal information material to changes in the prices of the shares of the Company which has not yet been disclosed to the public and to which information he has access by virtue of his office or position, and whether or not such act is done for his own or another person’s benefit, or to disclose such information so that he will receive consideration from the person who engages in the aforesaid acts, such person shall be liable under the applicable laws with respect to **insider trading** as a result of such contravention.

In case, directors, executives, managers, person responsible for the operation, auditor of the Company acquire or dispose of shares or other securities (if any) of the Company, such person have to report on such acquire or dispose to the SEC within the time described by SEC Act B.E. 2535. The said acquire or dispose of such person shall include the holding of shares and other securities (if any) by his spouse and minor children of securities in the Company.