



Indorama Ventures Public Company Limited

Use of Inside Information Policy

(As approved by the Board of Directors Meeting No. 1/2009 dated September 29, 2009)

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Use of Inside Information Policy

Purpose

The purpose of this policy is to ensure that internal information of the Company (as defined below) remains confidential and is properly used and/or shared.

Scope

This policy applies to the Company's Board of Directors, management, employees, trainees and persons who are not employees but authorized to act on behalf of or represent the Company.

Definitions and Acronyms

Company or IVL	Indorama Ventures Public Company Limited and all its Affiliates ¹ .
Confidential information	Confidential information refers to information which is not known to the public, or in the public domain. Confidential information includes, but not limit to, non-public information, financial information, commercial information, corporate structures, operations, trade secrets, technical know-how, designs, sales and marketing plans, market research, reports, manuals, proposal, pricing, business strategies, customer and supplier lists, assets and liabilities, analyses, forecasts, business studies and development plans, whistleblower reports whether written, transmitted orally, visually, electronically or by any other means, compilations, studies, or documents which contain or are generated from such Confidential Information.
Insider trading²	The buying or selling of a security by an individual who has access to material information about the security when such information is still non-public. Trading while having special knowledge is unfair to other investors who don't have access to knowledge.

¹ "Affiliate" means any company or entity, controlling, controlled by, or under common control with the Company. The term "Control" and its correlative meanings, "controlling," "controlled by" and "under common control with," means the legal, beneficial or equitable ownership, directly or indirectly, not less than 50 (fifty) percent of the aggregate of registered and paid-up shares in a company or an entity.

² Source: "Market Surveillance Department" by Stock Exchange of Thailand (SET).

Material information ³	Information is considered to be “material” if its dissemination to the public would likely affect the market value or trading price of the Company’s securities (i.e. stock), or would likely influence a reasonable investor’s decision to purchase or sell the Company’s securities.
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Policy Provision

All directors, management, and employees of the Company shall keep all information of the Company confidential and/or internal, except when it is required to be disclosed for the purpose of the operation of the Company's businesses.

All directors, management, 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.

All directors, management, 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 shall not 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 the spouses and children (minors) of the directors, management, and employees of the Company. Violators of the regulations shall be deemed as committing a serious offense.

Following the Company’s listing on the Stock Exchange of Thailand, directors, management, the auditor, and employees of the Company who purchase or sell, offer to purchase or sell, or invite any other person to purchase, sell or offer to purchase or sell shares of the Company in such a way as to take advantage of others by using internal information material to changes in the price of IVL shares which have not yet been disclosed to the public and to which they have access by virtue of their position, and whether or not such act is done for their own or another party’s benefit, or to disclose such information so that they receive consideration from the party that engages in the aforesaid acts, such person shall be liable under the applicable laws with respect to insider trading.

In case directors, management, or the auditor of the Company acquire or dispose of shares or other securities (if any) of the Company, such person has to report such acquisitions or disposals to the SEC within the time described by the SEC Act B.E. 2535. The said acquisition or disposal must include the shareholdings and other securities (if any) by the person’s spouse and children (minors) in the Company.

³ Source: “Material Nonpublic Information: What it is and what to do when you come in possession of it” by Corporate Finance Institute.

Enforceability

In the event that any provision contained in this policy is in conflict with the local laws, rules and regulations of any entity, and makes such provision invalid or unenforceable, then such local laws, rules and regulations will prevail.

If a business unit or location has adopted stronger practices than this policy or prevailing customs, the stronger practice shall apply.

Related Document

None

Revision History

Version	Approved by	Approval date	Key modifications
Original	The Board of Directors	Meeting No. 1/2009 dated September 29, 2009	-