

Information Technology Management Policy

Alpha Capital Partners Group Company Limited

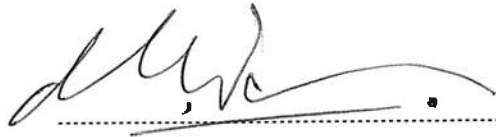
Alpha Capital Partners Group Company Limited (the '**Company**') recognizes the importance of embracing and adapting to the increasingly digital world, and thus the importance of IT governance as the Company leverages and utilizes technology to drive business growth and efficiency.

Therefore, the Company is putting in place a corporate framework for the monitoring and management of its information technology resources that corresponds to the needs of the business and ensures that information technology is effectively utilized in enhancing business opportunities and in improving risk management for the achievement of the Company's goals.

1. The Company is putting in place initiatives to enhance the efficiency of its information technology management, promote appropriate and adequate use of resources beneficial for decision making and encourage the continuous development of the Company's information technology management. The use of information technology plays an important role in driving the Company's business while at the same time being in line with the relevant laws, rules, regulations and standards without infringement or abuse of lawful and valid intellectual property of others, as follows;
 - 1.1. The Company shall utilize its computers and information technology in accordance with the Computer-Related Crime Act and other relevant legislation;
 - 1.2. The Company shall set and maintain access restrictions to internal information, based on level of confidentiality, with access granted to relevant and required individuals/staff as appropriate. Internal information that is confidential can be disclosed to certain select employees who need access, with clear restrictions on utilization.
 - 1.3. The Company prohibits any amendment, duplication, deletion, or destruction of the Company's information, including the disclosure of the information under the Company's information system, without any prior consent from the Company.
 - 1.4. The Company shall frequently back up all information related to the business operation of the Company, both stored in the user's computer or the server.
 - 1.5. The Company will ensure that users follow the guidelines on access and use of IT systems. The Company will prevent 3rd parties from getting access to passwords to the system.
 - 1.6. The Company shall not operate the information technology system contrary to good morals, such as gambling, affecting national security, or violating the rights of others.

- 1.7. The Company shall strictly prohibit an irrelevant third party or an outsider from connecting any computers or devices to the information technology system and the Company's network system. If there is any necessary, they must proper request for an approval from the Company.
- 1.8. The remote access to the Company's network system must be appropriately authenticated and comply with remote network connectivity standards.
- 1.9. The Company shall ensure that no employees or none of the users of the information technology system shall not violate the security of the Company's IT system, shall not disturb the function of the network system, and shall not avoid the authenticator process or security measures, including eavesdropping or interception of unauthorized data unless it is performed under the assigned duties.
- 1.10. The Company's online communication must proceed appropriately and correctly, considering fairness to all related parties and not causing damage to the Company.
2. The Company is adopting a strategic plan to promote security of information technology, to ensure that a system is put in place for the safeguarding of confidentiality, integrity, and availability of data and to prevent misuse of information or unauthorized changing of data. The Company's directors, senior executives, and employees, including relevant third parties, recognize the importance, duties, responsibility, and best practices regarding this strategic plan for the security of the Company's information technology. Access to data may only be gained through the channels determined by the Company.
3. The Company is putting in place measures for business continuity management by providing backups of data, computer systems and contingency plan in case of an emergency with the aim to ensure that the organization is prepared for the possible occurrence of information technology emergency. Incident management and asset management systems are also put in place for this purpose.
4. The Company appropriately and sufficiently manages and allocates its information technology resources. Guidelines are provided for the occurrence of inability to allocate sufficient resources to meet the specified requirements. In such cases, necessary supports including human resources, budgets, work hours, trainings and advice will be provided.
5. The Company will review and revise both its short-term and long-term information technology policies, targets and working plan to ensure smooth implementation of its business changes.

The Board of Directors of the Company considered and approved this Information Technology Management Policy in Board of Directors meeting No. 7/2022, which was held on 4 November 2022. The Information Technology Management Policy shall come into force as from 4 November 2022.



(Mr. Christopher Michael Nacson)
Chairman of the Board of Directors
Alpha Capital Partners Group Company Limited