

# Investor Relations Code of Conduct

## Chularat Hospital Public Company Limited (“CHG”)

Chularat Hospital Public Company Limited (the “Company”) has established the Investor Relations Code of Conduct as a guideline for the Company’s IR function to perform their duties base on the principles of accuracy, adequacy, timeliness, equitability, integrity and in compliance with the Company’s Corporate Governance Policy and Code of conduct. Investor Relations officers (IROs) shall act as follows :

### 1. **Disclosing material information accurately, sufficiently and in timely fashion.**

(1) Disclose material information in accordance with the rules and regulations of the authorities concerned, such as the SEC and the SET.

(2) Refuse to provide trade secrets or that which would give competitors a competitive edge.

(3) Provide clear and sufficient information for understanding.

(4) In case of rumors or new leaks, IROs should immediately clarify the facts to the public in accordance with the SET and the SEC rules and regulations.

(5) Not disclose inaccurate information with the intention to manipulate share trading.

(6) Establish dissemination channels that treat all stakeholders fairly and equally...

- Disclosure through the SET
- MD&A
- Material information such as Annual Report, Sustainability Report, Operational Performance Report, IR presentation, etc.
- Analyst Meeting or Investor Meeting
- Company’s Website, Email, LINE
- Site Visit
- Participation in local and International Roadshow

## 2. Handling inside information

(1) The Company determines and limits the personnel to access to the Company's inside information. IROs allowed to access to inside information shall not disclose that inside information to any outsiders prior to the compulsory public disclosure.

(2) Any information disclosure that has significant impact on operational performance should be disseminated through the SET's electronic system prior to disclosure to any particular group of investors.

(3) Quiet Period for not accepting any appointment or answering any questions regarding the Company's operational performance to analysts and investors is 15 days prior to the disclosure of financial statement/earning result.

(4) Prohibited trading periods for IROs is 30 days prior to and 1 day after the Board of Directors' meeting in the resolution to certify the financial statement of the Company. IROs are required to submit that share trading report to Compliance Division.

## 3. Disclosing information fairly and equitably

(1) Provide all stakeholders an equal opportunity to access to information and not causing any parties to lose an investment opportunity. Activities hosted for each group of stakeholders may differ as appropriate while the information provided must be the same and not benefit only a particular party such as Company Visit, Roadshow, Analyst meeting.

(2) Provide all stakeholders an equal opportunity to contact and make enquiries without any special privileges given to any particular group of stakeholders.

(3) Disclose any information which have been presented exclusively at a particular event to the public on the Company's website after the event or as soon as possible such as Analyst Presentation.

(4) Investor Relations Officers should treat each group of stakeholders as follows:

Stakeholders	Action/Conduct
<b>Investors</b>	<ol style="list-style-type: none"> <li>1. Treat all investors, retail or institutional, equally.</li> <li>2. Provide the information to retail investors at the same level as those provided to analysts and institutional investors.</li> </ol>
<b>Analysts</b>	<ol style="list-style-type: none"> <li>1. Provide an equal opportunity to all analysts from all security companies to attend Analyst Meeting arranged by the Company.</li> </ol>

	<ol style="list-style-type: none"> <li>2. Respect analysts' findings, reviews and research, however IROs can clarify the facts if there is any misunderstanding or inaccurate information.</li> </ol>
<b>Media</b>	<ol style="list-style-type: none"> <li>1. Provide the information and opportunity for the media to have access to data as deemed appropriate.</li> </ol>
<b>Regulators</b>	<ol style="list-style-type: none"> <li>1. Cooperate in providing information to regulators upon request.</li> </ol>
<b>Internal parties</b>	<ol style="list-style-type: none"> <li>1. Arrange the meetings for management to discuss issues of concern with all stakeholders as deemed appropriate.</li> <li>2. Report all useful information to the Board and management, such as IR activities, comments from analysts and investors, etc.</li> <li>3. Communicate the Company's IR code of conduct to all employees so that they all understand and behave in the same way as the IROs such as how to handle inside information.</li> </ol>
<b>Others</b>	<ol style="list-style-type: none"> <li>1. Provide the same level of information to all stakeholders, except for some certain necessities in business operation.</li> </ol>

#### 4. Performing duties with integrity

(1) Strictly comply with the Company's rules and policies and employee's code of conduct.

(2) Refrain from any actions which could be seen as a conflict of interest, such as using company assets for personal gain.

(3) Not seek any personal gains from relationships and information obtained in performing duties for the Company.

(4) Not put personal gain before the Company's when working with third parties. For example, not participate in roadshows with only brokerage firms that offer special treatment.



(Mr. Kumpol Plussind)  
Chief Executive Officer

2<sup>nd</sup> May 2019