

Supervision of Using Inside Information Policy

Chularat Hospital Group

Chularat Hospital Public Company Limited ("the Company") has determined various actions and measures to prevent any disclosure or transactions that may cause conflict of interest, including the illegitimately using the Company's inside information which significantly has an impact on the business operations as well as the Company's securities or its price and may lead to an inequitable obtaining the Company's information, as a result, benefiting from the use of such inside information. The Company has set the following guidelines.

- 1. The Company has established Code of Conduct for business as well as Staff Ethics in relation to the conflict of interest, the information disclosure, the prohibition of using the Company's inside information for seeking benefits for themselves or others, including the good corporate governance policy, the treatment of shareholders regarding shareholders' rights and patient privacy and confidentiality, by communicating and disseminating such guidelines to relevant persons for their acknowledgement and adherence.
- 2. The Company has determined the Quiet Period for the period of 30 days prior to the announcement of the Company's operating results or quarterly and annual financial statements. During the Quiet Period, directors and executives are not allowed to trade any of the Company's securities and must not give their opinion on the direction of investment, profit and operating results, except such disclosures are facts that have already been disclosed to the general public.
- 3. Disclosure of the Company's securities holding of directors and executives: The directors and executives are required to provide and report on their securities held in their own name or any accounts held by their spouses or minor children (if any) within 1 month since their first term in the position and report within 3 days after changing in securities holding to Securities and Exchange Commission, including informing such changes to Company Secretary for acknowledgement and to inform the Board of Directors in the following meeting
 - 4. Report on Interest of Directors, Executives, and Related Persons:

The directors and executives are required to prepare a report on their interests and related persons' interest and send it to the Company Secretary and such report must be prepared upon any changes. The Company Secretary is responsible for collecting information, reporting it to the Chairman of the Board and informing the meeting of the Board of Directors for acknowledgement in compliance with the Securities and Exchange Act B.E.2535 (1992) as amended by the Securities and Exchange Act (No.4) B.E.2551 (2008)



and/or Notification of the Capital Market Supervisory Board. The Company will use such information to control transactions between the Company and directors or executives and/or related persons of such persons in order to comply with the rules and regulations and the principles of good corporate governance.

Executive means executive defined by the Securities and Exchange Act B.E.2535 (1992) as amended by Securities and Exchange Act (No.4) B.E.2551 (2008) and/or Notification of the Capital Market Supervisory Board.

- 5. Disciplinary actions shall be taken when it is found that the information has been used for personal interest.
- <u>In case of the Company's directors</u> Any directors who has been judged by the Company's regulators as the listed company on the Stock Exchange of Thailand that he/she shall not possess any characteristics showing inappropriateness to be trusted with business management of the public company in relation to the Notification of the Securities and Exchange Commission No. Kor.Chor. 8/2553 Re: Determination of Untrustworthy Characteristics of Company Directors and Executives. Possessions of untrustworthy characteristics according to mentioned and related laws shall cause such person to be removed from his/her directorship.
- In case of executives or staff of the Company or subsidiaries The Company shall establish the Corporate Investigation Committee for fact findings and providing appropriated disciplinary action. If found guilty, the Company and subsidiaries may issue warning letter or approve the termination of employment to such executives or staff or transfer to any position with no benefit of internal information of the Company or any position irrelevant to previous position. Such disciplinary action is up to intention of illegitimate act, knowledge and experience in career path of that defendant affected to the Company in accordance with rules and regulations of the Company and subsidiaries, related laws including terms and conditions required by regulatory agencies as the listed company on the Stock Exchange of Thailand.
- 6. The Company shall provide the trainings by legal experts on Public Limited Companies Act and the Securities and Exchange Act to directors and executives on an annual basis to enhance their awareness of the roles and responsibilities and be aware of the penalties from using inside information (Insider Trading) to buy or sell the Company's securities.

The policy reviewed by the Board of Directors as of November 13, 2023.

The policy was approved by the resolution of the Board of Directors' meeting No. 5/2023 on November 14, 2023.