

Code of Conduct

Chularat Hospital Group Public Company Limited

Chularat Hospital Group Public Company Limited (“CHG”) is committed to operating its business with fairness, transparency, and accountability, in full alignment with good corporate governance and the highest ethical standards. The Company recognizes that strong ethics are the foundation of sustainable success. Therefore, the Company’s Code of Conduct serves as the guiding framework for all executives and employees, ensuring consistent, responsible, and principled decision-making across the organization. Our Code of Conduct covers key areas critical to maintaining stakeholder trust and corporate integrity: **Anti-Corruption** – Zero tolerance for bribery and corrupt practices, **Conflicts of Interest** – Ensuring decisions are free from personal gain or bias, **Whistleblowing** – Secure and confidential channels for reporting misconduct, **Confidentiality of Information** – Protecting sensitive and proprietary data, **Antitrust & Anti-Competitive Practices** – Promoting fair market conduct, **Insider Trading/Dealing** – Safeguarding the integrity of financial markets, **Safety, Health & Environment (SHE)** – Prioritizing the well-being of our people and workplace, and **Information Technology Security & Cybersecurity** – Ensuring the security of systems and digital assets. The Company is committed to safeguarding the interests of all stakeholders, both in Thailand and internationally. The Company actively promotes and enforces organization-wide adherence by all executives and employees to these principles, ensuring a unified and consistent approach. Serving as the foundation and framework for all operations, these principles—rooted in integrity, ethics, good corporate governance, and honesty—guide the Company in creating sustainable value, enhancing organizational excellence, and achieving its strategic objectives and long-term business goals.

Definitions

For the purposes of this Code of Conduct, the following terms shall have the meanings set forth below:

“**Business Ethics**” refers to the moral principles and ethical standards that guide the conduct of business operations.

“**Code of Conduct**” refers to the prescribed guidelines, best practices, and behavioral standards to be observed in the performance of duties.

“**Company**” refers to Chularat Hospital Group Public Company Limited and its subsidiaries.

“**Board of Directors**” refers to the Company’s Board of Directors and the Executive Committee.

“Executives” refers to individuals holding managerial authority in accordance with the Company’s operational rules and regulations, including the Chief Executive Officer and the highest-ranking officers of divisions or departments.

“Employees” refers to all operational-level staff members, regardless of position.

“Personnel” refers collectively to all employees and executives of the Company.

“Business Partners” refers to suppliers and providers of goods or services to the Company.

“Customers” refers to individuals or entities that use the Company’s services.

“Stakeholders” refers to all groups with an interest in or connection to the Company’s business, including but not limited to shareholders, employees, customers, business partners, creditors, competitors, government agencies, and other organizations.

Code of Ethics: The Company conducts its business with integrity and in accordance with ethical principles, both within the organization and in its dealings with external parties and all stakeholders.

Code of Conduct: The Company has promulgated clear, comprehensive, and robust guidelines to govern ethical business conduct. These guidelines are designed to proactively prevent any misconduct, exemplify best practices, and ensure unwavering accountability to all stakeholders. They reflect the Company’s steadfast commitment to fostering a corporate culture in which directors, executives, and employees consistently act with the utmost integrity, fairness, and respect for equality. All personnel are required to comply fully with applicable laws and regulations and to rigorously adhere to the Company’s internal policies. This framework serves as a cornerstone for the Company’s pursuit of its strategic objectives, ensuring that all business activities are conducted in accordance with the highest standards of ethical conduct and corporate governance. The following principles constitute the foundation of this commitment:

1. Employee Code of Conduct
2. Anti-corruption
3. Conflict of Interest
4. Whistleblowing
5. Confidentiality of Information and Insider Trading/Dealing
6. Antitrust/Anticompetitive Practices
7. Safety, Health and Environment
8. Information Technology Security & Cybersecurity

Guidelines for the Code of Conduct

1. Employee Code of Conduct

All executives, employees, and staff of the Company are expected to fully comply with all applicable laws, Company regulations, and the ethical standards set forth in this Code of Conduct. Each individual holds a fundamental responsibility not only to uphold these principles personally but also to foster and encourage ethical behavior throughout the organization. Our ethical framework prioritizes the well-being of patients above all else, ensures the protection of patient rights and confidentiality, promotes independent and principled decision-making, and cultivates a culture of transparency and accountability. Moreover, it mandates that any ethical concerns or conflicts be addressed promptly and effectively within an appropriate timeframe. To safeguard the Company's integrity and reputation, explicit guidelines, controls, and examples of unacceptable conduct have been established. All personnel are required to familiarize themselves with these provisions and diligently avoid any actions that contravene these standards. These guidelines are derived from and consistent with the principles outlined in the **“Chularat Hospital Group Employee Code of Conduct”**.

2. Anti-Corruption

All executives, employees, and staff of the Company are obligated to fully comply with applicable laws, Company regulations, and anti-corruption policies. Corruption is defined as the improper performance or deliberate omission of duties, or the misuse of authority, in violation of legal, ethical, regulatory, or Company policy standards, undertaken to gain undue advantages in any form.

Accordingly, directors, executives, and employees must neither engage in nor support any acts of corruption under any circumstances. They are required to strictly adhere to anti-corruption measures and actively participate in and cooperate with internal audit and monitoring processes to prevent and address any incidents of corruption or fraudulent conduct within the organization. These practices are based on and aligned with the **“Chularat Hospital Group Anti-Corruption Policy.”**

3. Conflict of Interest and Insider Trading/Dealing

All directors, executives, employees, and staff of the Company are required to comply fully with applicable laws and Company regulations. This includes signing declarations regarding conflicts of interest and insider trading to certify that they have not engaged in any actions that would create a conflict of interest with the Company or its subsidiaries. Furthermore, personnel must refrain from collecting, using, or disclosing any material non-public information related to the Company, which could significantly impact the price of securities, for the purpose of buying or selling securities based on such information before it is publicly disclosed on an equal basis. Such actions may constitute violations of the Securities and Exchange Act B.E. 2535 (1992) and other relevant laws.

4. Whistleblowing

The Company has established a formal procedure for addressing complaints or whistleblower reports related to suspected corruption. An independent task force shall conduct thorough investigations and collect pertinent evidence, operating in strict accordance with the principles of good corporate governance, applicable Company policies, regulations, operational guidelines, and relevant legal requirements. Should the task force identify any risk that may compromise transparency or integrity in the Company's operations, it shall promptly report its findings to the appropriate internal authorities, including the Board of Directors or the Chairman of the Executive Committee. This mechanism ensures timely and effective remedial action to mitigate potential harm. Moreover, any personnel found to have violated Company policies or engaged in conduct inconsistent with ethical standards relative to their position will be subject to disciplinary measures pursuant to the Company's regulations and, where appropriate, any applicable legal proceedings.

All directors, executives, employees, and staff of the Company are obligated to comply with applicable laws, Company regulations, and whistleblowing procedures. Any violations or non-compliance with the Company's rules, regulations, business ethics, or corporate governance principles may be reported or raised through the following channels:

4.1 By postal mail: Complaints or reports may be sent to the designated recipient at the following address:

Chularat Hospital Group Public Company Limited, 88/8-9 Moo 11, Bang Pla, Bang Phli, Samut Prakan

4.2 By email: Suggestions or complaints can be submitted via email at:

Types of Reports	Report to
Violations of the Employee Code of Conduct	hrg@chularat.com
Violations of the Code of Conduct by the Board of Directors	companysecretary@chularat.com
Violations of Medical Ethics	chularat3@chularat.com
Irregularities in Financial Reporting	internalaudit@chularat.com
Issues Affecting the Company's Reputation and Public Image	companysecretary@chularat.com

The Company's practices are guided by and aligned with the **"Employee Code of Conduct of the Chularat Hospital Group."**

5. Confidentiality of Information

All directors, executives, employees, and personnel of the Company are obligated to fully comply with all applicable laws and Company regulations, including strict adherence to Confidentiality of Information requirements and the Personal Data Protection Act (PDPA).

Confidential Information refers to any data which, if disclosed to unauthorized parties at any time, could adversely affect the Company's interests, including its image and reputation. Accordingly, employees and directors have a duty to safeguard such information, limiting its disclosure strictly to relevant and authorized individuals. In particular, personal data and medical information pertaining to patients are regarded as highly sensitive and confidential, warranting the utmost protection. The management and use of internal information must be conducted in accordance with the Company's "**Insider Information Policy**" and "**Information Disclosure Policy**".

6. Antitrust/Anticompetitive Practices

All directors, executives, employees, and staff of the Company are required to comply with applicable laws and Company regulations, including those related to the prohibition of unfair competition (Antitrust/Anticompetitive Practices). To ensure clear and consistent practices across the organization, the Company has established an Antitrust/Anticompetitive Policy aimed at preventing monopolistic behavior and promoting fair trade competition in accordance with relevant competition laws. The policy outlines the following principles that all directors, executives, employees, and subsidiaries must understand and adhere to in order to comply with antitrust laws:

6.1 Pricing: When determining the pricing of the Company's products or services, it is imperative to ensure that prices are not set unreasonably below prevailing market levels or below the Company's cost in a manner that could be construed as predatory pricing aimed at driving competitors out of the market.

6.2 Prohibition of Collusive Behavior: Avoid any conduct that constitutes agreements among competing businesses to create monopolistic power or restrict competition, such as price-fixing, bid-rigging, or market allocation agreements.

6.3 Mergers and Acquisitions: Any merger or acquisition must be carefully evaluated to ensure it does not result in market monopolization or create unfair competitive advantages.

6.4 Fair Trade Practices: Avoid unfair trade practices or abuse of bargaining power that impose restrictive conditions or limit the options of business partners, including discriminatory treatment among competitors or other forms of market power abuse.

7. Safety, Health and Environment

The Company is committed to maintaining the highest standards of Safety, Health, and Environment (SHE) across all its operations. All directors, executives, employees, and staff are required to comply with all applicable laws, Company regulations, and industry best practices concerning occupational health and safety. In alignment with the guidance of the International Labour Organization (ILO) and the World Health Organization (WHO), the Company adheres to three fundamental principles to ensure a safe and healthy workplace:

1. **Employee Health Promotion:** Actively fostering the physical and mental well-being of all employees.
2. **Safe Working Environment:** Continuously improving workplace conditions to eliminate hazards and ensure the safety of all work areas.
3. **Safety Culture Development:** Building and nurturing a proactive culture of safety throughout the organization, encouraging full employee engagement and participation.

The Company's leadership underlines its commitment to SHE through the establishment and enforcement of formal policies, the provision of comprehensive safety training programs, and continuous support to promote safe practices. These efforts and practices are governed by and consistent with the "**Chularat Hospital Group Human Rights and Labor Practices Policy**", ensuring compliance with relevant labor and human rights standards.

8. Information Technology Security & Cybersecurity

The Company is committed to safeguarding the confidentiality, integrity, and availability of its information assets and information systems. All directors, executives, employees, and staff must fully comply with applicable laws, Company regulations, and established policies related to Information Technology Security and Cybersecurity/Cyber Attack. To uphold these commitments, the Company has established a comprehensive governance framework that clearly defines roles and responsibilities for managing information security risks. Specific individuals within the organization, including designated employees and authorized personnel, are entrusted with the following key responsibilities: overseeing and providing guidance on the proper collection, storage, and use of personal data across all Company systems, conducting regular audits and monitoring activities to ensure compliance with data protection and information security standards, and identifying, assessing, reporting any information security risks, incidents, or vulnerabilities to the Board of Directors and relevant stakeholders in a timely manner and recommending and facilitating appropriate corrective actions to mitigate identified risks and strengthen the Company's cybersecurity posture. The Company's approach to information security management aligns with industry best practices and complies with relevant regulations, as outlined in the "**Chularat Hospital Group Information Technology Security and Cybersecurity Policy**".