

Tax Policy

Chularat Hospital Public Company Limited

Chularat Hospital Public Company Limited and its subsidiaries (the “Company”) are committed to upholding the highest standards of tax governance and compliance. The Company adheres to all applicable tax laws, regulations, and requirements in every jurisdiction in which it operates. This policy serves as a framework to ensure transparency, accountability, and sustainable business practices.

Tax Code of Conduct

1. **Corporate Code of Conduct:** The Company’s Tax Code of Conduct is guided by its Good Corporate Governance Policy, with the objective of fostering an organization that operates with efficiency, accountability, and responsibility. The Company and its subsidiaries are committed to conducting business with integrity, fairness, and transparency, while ensuring that all practices are ethical, sustainable, and subject to appropriate oversight and verification.

2. **Transfer Pricing:** The Company ensures full compliance with applicable tax laws in determining transfer pricing for related-party transactions. All such transactions are conducted on an arm’s length basis, with prices for goods and services established primarily by reference to prevailing market values, reflecting the conditions of normal commercial practice.

3. **Tax Structure:** The Company expressly avoids the use of artificial, abusive, or deceptive tax structures. The Company does not pursue overly complex arrangements designed solely for the purpose of securing short-term tax benefits. Instead, the Company is committed to responsible tax practices that align with the spirit of the law and contribute to sustainable, long-term value creation.

4. **Corporate Sustainable Tax Framework:** The Company acknowledges its responsibility to shareholders by maintaining a strong financial foundation and upholding robust tax governance and compliance practices. Through these measures, the Company seeks to safeguard financial resilience, strengthen stakeholder confidence, and deliver sustainable long-term value creation.

5. **Tax Incentives:** The Company is committed to utilizing tax incentives in full compliance with applicable laws and in a manner that maximizes efficiency while supporting sustainable and responsive business decisions. The

application of such incentives is aligned with the intended objectives of improving tax system effectiveness and promoting economic development. Where eligible, the Company may benefit from additional incentives provided under national or local tax policies, ensuring that all claims are made transparently, responsibly, and in strict adherence to the relevant criteria.

6. Engagement with Tax Authorities: The Company respects the sovereign right of governments to establish and implement tax structures, rates, and collection mechanisms. The Company engages with tax authorities in a transparent, professional, and constructive manner. This approach fosters mutual trust, facilitates effective compliance, and supports a cooperative working relationship that enhances regulatory alignment and long-term business sustainability.

Tax Risk Management

1. Compliance with Tax Processes: The Company is firmly committed to managing its tax affairs responsibly and in full compliance with all applicable tax laws and regulations in every jurisdiction where it operates. In circumstances where tax legislation may lack clarity, the Company applies prudence, transparency, and sound judgment as guiding principles in its tax practices.

The Company has established rigorous procedures to ensure that all tax filings are accurate, complete, and submitted within statutory deadlines, in full compliance with applicable standards and best practices. Robust monitoring and oversight mechanisms are in place to minimize the risk of amendments, penalties, or surcharges.

The Company views its tax responsibilities as an integral part of its contribution to national economic development. Accordingly, it is committed to ensuring that all taxes paid are accurate, appropriate, and commensurate with the scale and nature of its business activities within each jurisdiction.

To further strengthen compliance, the Company has implemented comprehensive internal control systems across all tax-related processes. These controls cover the management of tax liabilities and reporting obligations, ensuring that all practices are conducted with accuracy, transparency, and consistency.

2. Monitoring and Reporting: The Company implements robust and transparent processes to monitor and review income tax reporting. All tax filings and related documentation are subject to independent verification by external auditors and, where applicable, by the Revenue Department. The Company ensures that both current income tax expenses and deferred tax balances are accurately recognized and reported in accordance with applicable accounting standards and regulatory requirements.

3. Reputational Risk: The Company actively monitors and manages compliance with tax regulations and the associated reputational risks. This includes continuous evaluation of the quality, consistency, and integrity of its tax management practices, as well as the accuracy and completeness of tax data, returns, and related reports. Regular analysis of tax estimates, potential tax risks, and deferred tax balances is conducted to ensure reliability, transparency, and alignment with best practices.

Policy Review and Continuous Improvement: The Company is committed to regularly reviewing this policy and enhancing related practices to ensure that its business operations remain fully aligned with the principles of responsible tax management and the Company's broader governance framework.