

# Securities Trading Policy

## Chularat Hospital Public Company Limited

### **Purpose**

Chularat Hospital Public Company Limited (the “Company”) and its subsidiaries (collectively, the “Group”) have established this Securities Trading Policy as a standard framework and guidelines for the trading of securities by its directors, executives, and employees, with the aim of ensuring transparency and adherence to good corporate governance practices.

### **Scope**

This policy applies to all directors, executives, and employees of the Group, as well as their spouses (or individuals in a marital-like relationship) and minor children, in relation to trading securities of the Company listed on the Stock Exchange of Thailand.

### **Definitions**

The terms used in this Policy shall have the following meanings unless otherwise specified or defined:

1. “**Securities**” refers to the Company’s ordinary shares listed on the Stock Exchange of Thailand, and shall include any other financial instruments or equity securities that may be issued in the future, such as preferred shares, share purchase rights, derivatives (e.g., futures and options), and warrants or debentures listed for trading on the Stock Exchange of Thailand.
2. “**Trading**” includes the purchase, sale, transfer, or receipt of any legal interest in securities, as well as the exercise of rights to purchase shares or rights under warrants or debentures.
3. “**Inside Information**” means material facts that could significantly affect the price of the Company’s securities and have not yet been disclosed to the public. Examples of Inside Information may include, but are not limited to, the following:
  - (a) The Company’s financial performance and results.
  - (b) Joint ventures, mergers, or the cancellation of joint ventures or mergers.
  - (c) Acquisition or disposal of significant Company assets.
  - (d) Tender offers or withdrawal of tender offers for securities in other companies.
  - (e) Declaration or suspension of dividends, and announcement of profits or losses.
  - (f) Changes in the par value of the Company’s common shares.

- (g) Issuance of new shares to the public or to specific individuals.
- (h) Redemption of Company securities or share repurchase programs (Treasury Stock).
- (i) Changes in control, or significant changes in the Board of Directors or top management of the Company.
- (j) Acquisition or loss of material commercial contracts.
- (k) Launch of major new products or significant developments in resources, technology, products, or marketing that materially affect the Company's financial position and operating results.
- (l) Borrowings or financing that are material to the Company's financial position and operating results.
- (m) Significant changes in capital expenditure projects (CAPEX).
- (n) Changes in the Company's objectives that materially impact its financial position and operating results.
- (o) Material legal disputes.
- (p) Significant disputes relating to labor, subcontractors, or suppliers of the Company.
- (q) Changes in accounting policies that significantly affect the Company's financial position and operating results.
- (r) Any other material actions or information that may affect the price of securities or the net asset value (NAV) of the Company.

4. "**Top Four Executives**" refers to executives as defined under the Capital Market Supervisory Board Notification No. TorJor. 23/2531, including: The Managing Director (referring to the highest-ranking executive of the Company, regardless of the title used by the Company); The next four executives in descending order from the Managing Director; Any individual holding a position equivalent to the fourth-ranking executive; and The highest-ranking executive in the accounting or finance function.

The Company Secretary is responsible for notifying the individuals identified as the Top Four Executives, as defined by the Capital Market Supervisory Board, to ensure that they are aware of their designation.

### **Roles and Responsibilities**

1. **Board of Directors:** Responsible for overseeing this policy to ensure that all directors, executives, and employees comply with the Company's securities trading rules and guidelines.
2. **Executives:** Accountable for ensuring that their subordinates understand and adhere to this policy.
3. **Company Secretary:** Responsible for coordinating the implementation of this policy and providing guidance or clarification in cases of uncertainty.

4. **Directors, Executives, and Employees:** Must strictly comply with this policy and communicate its provisions to their spouse (or equivalent partner) and minor children for acknowledgement.

### **Policy and Guidelines**

#### **1. Prohibition on Insider Trading**

All directors, executives, and employees must strictly comply with the prohibition on trading securities based on inside information. No individual shall directly or indirectly buy, sell, offer to buy or sell, or solicit others to buy or sell the Company's securities listed on the Stock Exchange of Thailand using material non-public information that could influence the price of the Company's securities and has been obtained by virtue of their position. This prohibition applies regardless of whether the action is for personal benefit, the benefit of others, or involves disclosing such information to enable others to trade.

#### **2. Designated Persons**

2.1 "Designated Persons" refers to individuals holding positions or responsibilities that grant them access to material non-public information of the Company, including their spouses and minor children. These include:

- (1) Directors
- (2) Top four executives
- (3) Chairpersons and Vice-Chairpersons of Executive Groups 1–6 and 7.1–7.2
- (4) Chief Financial Officers of Groups 1–6 and 7.1–7.2
- (5) Executives and employees in the Company Secretary Department, Investor Relations, and Finance & Accounting departments, but only those directly involved with financial statements
- (6) Any persons who have access to the Company's inside information or financial performance

2.2 Company Secretary is responsible for maintaining and updating the list of Designated Persons and notifying individuals when they are added to or removed from the list.

#### **3. Blackout Period and Quiet Period**

3.1 Designated Persons are strictly prohibited from trading the Company's securities or disclosing information during the 30-day period preceding the release of quarterly and annual financial statements, or during any other period that the Company may designate from time to time in connection with significant events. Trading may only occur after the relevant information has been publicly disclosed.

3.2 The Company Secretary is responsible for announcing the Blackout Period and Quiet Period in advance, and issuing reminders prior to the start of each period. This ensures that all Designated Persons are aware of the trading restrictions and comply with the established guidelines.

#### **4. Reporting Changes in Securities Holdings**

Designated Persons are required to report any changes in their holdings of the Company's securities within three (3) business days from the date of the transaction, as follows:

4.1 For directors and the top four executives, a report of changes in securities holdings must be prepared and disclosed to the Securities and Exchange Commission (SEC) in accordance with Section 59 of the Securities and Exchange Act B.E. 2535 (1992), through the SEC's electronic filing system.

4.2 For other designated person not included above, the change in holdings must be reported to the Company Secretary. In cases where the transaction is conducted by the Company Secretary, the report should be submitted to the Chief Executive Officer (President). (Details and reporting forms are provided in the attached document.)

#### **In Case of Doubt**

Should any director, executive, or employee have questions or uncertainties concerning this policy, be unsure whether material inside information has been disclosed, or be uncertain about the permissibility of trading securities in any circumstance, they are required to seek guidance from the Company Secretary.

#### **Policy Violations**

Any director, executive, or employee who violates this policy may be subject to disciplinary action in accordance with the Company's regulations, as deemed appropriate, and may also be liable under the Securities and Exchange Act B.E. 2535 (1992) and its subsequent amendments.

#### **Related Policies**

Directors, executives, and employees are expected to review and understand this policy in conjunction with the Company's other relevant policies and manuals, including:

1. Corporate Governance Policy
2. Code of Business Conduct and Ethics
3. Insider Information Management Policy
4. Information Disclosure Policy

The Company shall regularly review this policy and update related practices to ensure that its business operations fully comply with securities trading principles.