

## **Use of Inside Information Policy**

Vibhavadi Medical Center Public Company Limited ("the Company") has specified various actions to prevent disclosure and transactions that may cause conflicts of interest. These actions include preventing the unauthorized use of inside information, which may affect the Company's business operations and the value of the Company's securities. The Company seeks to prevent inequality in receiving the Company news and information, which may potentially result in benefiting from the use of such inside information. To avoid such circumstances, the Company has laid down the following guidelines:

- (1) Establish the Company's business ethics, including an employee's code of ethics, that covers conflicts of interest, disclosure of information and news, prohibiting the use of inside information, or the disclosure of inside information, for the benefit of oneself or others, including policies on good corporate governance, the treatment of stakeholders regarding their rights and maintaining confidentiality of recipients of the Company's services. The stipulations are communicated and disseminated to relevant persons for their general knowledge and adherence.
- (2) Determine the period during which the trading of the company's securities is prohibited and a 30-day 'silent period' in which directors and executives are prohibited from disclosing the Company's news and information before the announcement of the Company's operating results, or quarterly financial statements and annual financial statements. During the silent period, directors and executives are prohibited from expressing their opinions regarding investment guidelines, the Company's profits, and performance, except in the case of disclosing facts that have already been disclosed to the public.
- (3) Disclose the extent of securities holdings of directors and executives. The directors and executives are responsible for preparing and reporting their trading of the Company's securities within 1 month from the date of first assuming the position, and within 3 business days after there is a change in their holding of such securities, to the Securities and Exchange Commission along with reporting such holdings or changes to the Company's Secretariat so that he/she can compile a summary of changes in securities holdings of such companies and include it as an agenda for acknowledgment at the next meeting of the Board of Directors.
- (4) In reporting issues of personal interests, the Company requires its directors and executives to prepare a report on their personal interests and those of related persons and send it to the Company Secretary. Subsequent reports are also to be issued every time a change in information is initiated. The Company Secretary is responsible for consolidating such information and reporting it to the Chairman of the Board as

well as the Board of Directors' meeting for acknowledgment, as well as complying 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 announcements of the Capital Market Supervisory Board. The Company will use such information to manage and conduct transactions between the Company and its directors or executives, and/or related persons, in order to comply with the principles of the law and good corporate governance.

(5) Measures to be taken when inside information is found to be used for personal gains:

## \* In the case of a Director

Directors who have been judged to possess attributes that show a lack of suitability to be trusted to manage a business in which the public is a shareholder from the Company's governing body according to the announcement of the Securities and Exchange Commission No. KorJor. 8/2553, regarding the supervision of the lack of trustworthiness of directors and executives of companies listed on the stock exchange, will be disqualified from holding the position of Company director in accordance with relevant laws, as well as the rules and regulations announced by the Company's regulating agency that considers the Company as a listed entity on the stock exchange.

## \* In the case of a executive or employees, or its affiliates.

This will establish a central investigative committee to determine the facts and appropriate punishments. If the investigation reveals that an offense has been committed, the Company or its affiliates may issue a warning letter, suspend or terminate employment, or transfer the employee to a position where they cannot take advantage of the Company's internal information. The punishment will take into consideration the intent to commit the offense, knowledge and experience of the person's profession, severity of the damage caused, and impact on the Company. The punishment must be in accordance with the Company's or its affiliates' regulations, relevant laws, and regulations and rules announced by the Company's regulating agency that considers the Company as a listed entity on the stock exchange.