



(Translation)

**Supervision of Using Inside Information Policy**

Bangkok Dusit Medical Services Public Company Limited (“the company”) places an importance to prevent any disclosure or transaction that may cause conflict of interest including the illegitimately using the company’s inside information which significantly has an impact towards the business operations as well as the company’s listed securities or its price and may lead to an inequitable obtaining the company’s information As a result, benefiting from using such inside information. The company has set the following guidelines;

1. The Company has established Code of Conduct for business, including staff ethics in relation to the conflict of interest, the information disclosure, the prohibition of using any company inside information for seeking benefits for themselves or others as well as the good corporate governance policy, to conduct their duties to all stakeholders in accordance with the shareholders rights and to keep the information confidential for patients by communicating and disseminating such guidelines to relevant person to generally comply with.
2. Determining the Quiet Period for the period of 30 days prior to the announcement of the company’s business operation results or quarterly and annual financial Statements. Directors and executives<sup>1</sup> are not allowed to trade any of the company’s securities and must not give their opinions on the direction of investment, profits, and operating results except such disclosures are facts that have already been disclosed to the general public.
3. Disclosure the company securities (“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**

Whereas the Securities and Exchange Act B.E. 2535 (1992) as amended by the Securities and Exchange Act (No.4) B.E. 2551 (2008) stipulates that the company’s directors and an executives shall file with the company the report on their interest or a related person’s interest in relation to management of the company or the subsidiaries for the company’s using in compliance with the rules and principal of law and good corporate governance guidelines and also using in monitoring their adherence to such duties. Such report have to be submitted to the Company Secretary which shall be passed to the Chairman of the Board of directors since their first term in the position and further report after changing the information.

<sup>1</sup> 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.

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5. Disciplinary action shall be taken when it is found that the information has been used for personal interest.

- In case of the company's directors, any director 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 appropriateness to be trusted with business management of the public company pursuant 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, Corporate Investigation Committee must be established for fact finding and providing appropriate disciplinary action. If found guilty, the company or subsidiaries may issue warning letter or approve the termination of employment to such executives or staff or transfer to any position with no benefit on internal information of the company or any position irrelevant to previous position. Such disciplinary 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 or subsidiaries, related laws including terms and conditions required by regulatory agencies as the listed company on the Stock Exchange of Thailand.

Revised as of January 1, 2019

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