



## Code of Conduct

### Bangkok Dusit Medical Services Public Company Limited and the subsidiaries

So as to make known its intention with respect to business operation and with a view to achieve its objectives, Bangkok Dusit Medical Services Public Company Limited (the "Company") has, therefore, established a Code of Conduct for use by its employees as a guideline and framework in performing work for the Company. In this regard, the Company's business operation is based on the principles of virtue, ethics, integrity and good corporate governance.

This Code of Ethics consists of the following parts:

1. Definitions
2. Recommendations to Employees with respect to the Code of Conduct
3. Reporting Noncompliance with the Code of Conduct
4. Noncompliant Conduct
5. Guidelines for Practice
6. Procedures following the Receipt of Complaints
7. Protection and Damage Mitigation for Reporters or those who cooperated in the reporting process

#### 1. Definitions

**"Company"** means Bangkok Dusit Medical Services Public Company Limited and the subsidiaries of Bangkok Dusit Medical Services Public Company Limited.

**"Employees"** means persons who have executed an employment agreement or fixed term employment agreement with the Company, or persons who receive income from the Company, whether on a regular or occasional basis due to the performance of duties for the Company.

#### 2. Recommendations to Employees with respect to the Code of Conduct

It is the duty of all Employees to comply with the Code of Conduct as follows. All Employees shall:

- 2.1 Read and understand the contents of this Code of Conduct, and, should they have any queries, Employees are to consult their supervisors accordingly;
- 2.2 Give their full cooperation in investigations of various facts and be responsible for reporting any violations of or noncompliance with the Code of Conduct; and
- 2.3 With respect to supervisors, the supervisors of all levels shall lead by example in complying with the Code of Conduct and shall encourage other Employees to do the same so as to create a work atmosphere which facilitates compliance with the Code of Conduct. All supervisors shall also endeavor to discourage and prevent violations of the Code of Conduct.



### 3. Reporting Noncompliance with the Code of Conduct

In the event that any executive or employee finds any other acts which, despite not being set forth in this Employee Code of Conduct, when undertaken or omitted, will have an impact on the reputation, transparency and the principle of good governance of the organization, including acts which may be in conflict with any other policies of the Company, it shall be deemed the duty of the aforementioned executive or Employee to report such issues to the responsible person(s).

In this regard, the Company has assigned persons to be in charge of handling reports regarding noncompliance and has established channels for reporting practices which are noncompliant with the Code of Conduct or which are in violation thereof, or dishonest behavior as follows:

#### 3.1 Persons assigned to handle issues or reports

Reports are to be referred to the following persons:

Issue	Responsible Person(s) / Person(s) to be Notified
3.1.1 Noncompliance with the Code of Conduct by Employees	Highest-ranking officer of the Corporate Human Resources Department
3.1.2 Noncompliance with the Code of Conduct by Directors	Chairman of the Board of Directors/ or Chairman of Audit Committee/ or Company secretary
3.1.3 Noncompliance with the professional conduct and ethics for medical practitioners	Chief Operating Officer/ or Chief Medical Officers
3.1.4 Irregularities regarding financial report and transactions	Chairman of Audit Committee
3.1.5 Matters which have an impact on the reputation and image of the Company	President

#### 3.2 Channels for filing Complaints and Recommendations

Complaints or recommendations regarding violations or noncompliance with the regulations, rules or practices which are in conflict with business ethics or with the principle of corporate governance may be communicated through various channels as follows:

3.2.1. By post; by mailing to the person assigned to handle reports as mentioned above in Section 3.1 at the following address: "Bangkok Dusit Medical Services Public Company Limited, No. 2, Soi Soonvijai 7, New Petchburi Road, Bangkok Subdistrict, Huay-kwang District, Bangkok Metropolis, Thailand 10310"

3.2.2. By email; recommendations or complaints may be forwarded to:



Issue	Notification Address
Noncompliance with the Code of Conduct by Employees	<a href="mailto:ConductEmployee@bdms.co.th">ConductEmployee@bdms.co.th</a>
Noncompliance with the Code of Conduct by directors	<a href="mailto:ConductDirector@bdms.co.th">ConductDirector@bdms.co.th</a>
Noncompliance with the code of medical ethics	<a href="mailto:ConductDoctor@bdms.co.th">ConductDoctor@bdms.co.th</a>
Irregularities regarding financial transactions	<a href="mailto:ConductAudit@bdms.co.th">ConductAudit@bdms.co.th</a>
Matters which have an impact on the reputation and image of the Company	<a href="mailto:Conduct@bdms.co.th">Conduct@bdms.co.th</a>

#### 4. Noncompliant Conduct

All executives, Employees and staff of the Company have the duty to comply with and encourage others to comply with the Code of Conduct. Notwithstanding the foregoing, in order to prevent practices which are in violation of the Code of Conduct and which will consequently damage the reputation of the organization, the Company hereby specifies practices deemed in violation of the Code of Conduct for the above persons to understand and avoid as follows:

- 4.1 Noncompliance with the Company's Code of Conduct;
- 4.2 Participating by means of advising, guiding, encouraging or promoting others not to comply with the Code of Conduct;
- 4.3 Refraining from undertaking actions in response to or being negligent towards conduct which is in violation of or noncompliant with the Code of Conduct in the event that he/she becomes aware of or finds such matters, or if the same is related to work under his/her responsibility;
- 4.4 Not giving cooperation in or obstructing the gathering and compilation of information and investigations regarding complaints with respect to violations of or noncompliance with the Code of Conduct;
- 4.5 Actions which are unfair to other employees as a result of reporting or filing complaints by giving false information or by making one-sided allegations with the intention of distorting facts so as to defame or to create disunity among the Company's employees; and
- 4.6 All Employees shall also have the duty to report findings pertaining to practices which, despite not being specified in this Code of Conduct, when undertaken or omitted, will have an impact on the reputation, transparency and the principle of good governance of the organization, including acts which may be in conflict with any other policies of the Company.

Persons who violate or who do not comply with the Code of Conduct shall be subject to disciplinary action pursuant to the rules and regulations of the Company and, in the case that the aforementioned offense is in violation of the law, such persons shall also be subject to punishment as prescribed by the law.



## 5. Guidelines for Practice

### 5.1 Observing the Law

The Company and all of its employees shall abide by the law and shall stand firm in undertaking actions which are righteous, lawful and just. Furthermore, in operating its business overseas, the local environment, customs, traditions, and culture of those respective countries shall also be taken into account.

#### *Course of Action:*

- 1) The Employees of the Company shall endeavor to understand all laws relevant to their duties and responsibilities and shall strictly comply therewith. Employees shall consult the Company's legal department for further guidance should they have any questions.
- 2) The Employees of the Company who are required to perform duties overseas shall study the laws, customs, traditions and culture of their respective country of destination to ensure that they do not undertake acts which are in violation of the law and in conflict with the customs and traditions of those countries.

### 5.2 Political Action

The Company is a politically neutral organization and does not undertake any acts in the interest of any political parties, groups, or politicians, regardless whether at the national or provincial level. The Company encourages its personnel to adhere to the democratic system under the leadership of His Majesty the King and to be aware of and respect the rights to political freedom of the Employees as set forth by law.

#### *Course of Action:*

- 1) Employees shall not appropriate the resources of the Company for the purpose of supporting political activities of any political parties, groups, or politicians, whether directly or indirectly;
- 2) Employees shall refrain from taking on roles as committee members of political parties, representatives of political parties in various public events, or members of local administrative organizations;
- 3) Employees shall not conduct themselves in any way which causes others to believe that the Company is involved with or giving support to a political party;
- 4) Employees shall not use the power, resources, and name of the Company for the purpose of raising funds or for carrying out political activities;
- 5) Employees shall refrain from expressing their political opinion in the workplace or during work hours which may lead to differences in beliefs.

### 5.3 Maintaining Corporate Assets

Corporate Assets means movable properties such as tools, machinery, and office equipment, and immovable properties such as structures and land. In addition, the said term shall also mean technology, theoretical knowledge, information, documents of title, rights, copyrights, patents, as well as inventions and secrets of the Company.



*Course of Action:*

- 1) Employees have the duty and responsibility to use the Corporate Assets for the best interest of the Company and to maintain the aforementioned Corporate Assets so that they are not damaged or lost. Employees shall not, furthermore, use the Corporate Assets for their personal interest or for that of others whereby doing so will not benefit the Company;
- 2) Any research which the Company has assigned its personnel to conduct or organize or any work which requires information and work obtained in the course of employment by the Company, rights to research work, obtainment of patents, ownership of patents and remuneration thereof shall be deemed Corporate Assets; and
- 3) The Company is the copyright owner of all computer programs which its personnel have been assigned to develop, as well as the benefits arising from such programs.

5.4 Confidentiality and Use of Internal Information

Confidential information is information that, if disclosed to others at any given time, will have an impact on the Company as well as its image and reputation. It is therefore the duty of all Employees and directors of the Company to protect the aforementioned information by conveying the same specifically to persons related thereto and only in the case where necessary. Furthermore, personal information and patients' medical information are also deemed confidential information.

The use of internal information shall be in accordance with the "Internal Information Policy" and "Policy on the Disclosure of Information".

*Course of Action:*

- 1) Employees shall not disclose personal information and information pertaining to the medical history of patients to other Employees or to third parties who are unrelated thereto, unless in the case where such disclosure is for the purpose of treating the patient pursuant to the Declaration on the Rights of the Patient and unless required by law;
- 2) Employees shall not disclose information which, at such period of time, cannot be disclosed, for example, information relating to the operating results and the management of the business which have not yet been made known to the general public;
- 3) Employees shall not use the internal information with a view to obtain benefits for themselves or for others, such as purchasing shares of the Company at the time which operating results are about to be disclosed, and acquiring land or investing in businesses in areas neighboring those in which the Company is to expand its business;





- 4) Information shall only be disclosed by Employees assigned by the Company or by Employees who have the authority and duty to disclose such information, in order to ensure that the information disclosed is correct and in line with one another.
- 5) Employees shall not use the Company's computer system to spread inappropriate information with respect to morality, customs, and tradition, or information that is in violation of the law, including forwarding emails which disturb or are a nuisance to others, or which are considered personal business unrelated to the business operation of the Company.

#### 5.5 Conflicts of Interest

The Employees of the Company shall dedicate themselves to performing their duties in the best interest of the Company and shall not undertake or carry out any acts for their own benefit or acts which will cause conflicts of interest, and shall not operate any business that is in competition with the Company.

#### *Course of Action:*

- 1) Employees shall dedicate themselves to performing their duties to the best of their abilities. If Employees are required to perform other work for any other purpose whatsoever, such work must:
  - 1.1) Be lawful, or not in violation of the law;
  - 1.2) Not conflict with the interests of the Company;
  - 1.3) Not damage the reputation and image of the Company;
  - 1.4) Not use the secrets of the Company;
  - 1.5) Not affect their work duties;
  - 1.6) Facilitate, promote and advertise the Company's image; and
  - 1.7) Promote the use of knowledge obtained in the course of work for improving work for the benefit of the Company.
- 2) Employees shall not solicit or receive objects, assets, money or any other benefits from persons related to the business operation of the Company which will influence them to make business decisions in favor of the giver thereof;
- 3) Employees shall not offer objects, assets, money or any other things in exchange for personal privileges to which they are not be entitled;
- 4) Employees shall not issue orders which will benefit themselves, both directly and indirectly;
- 5) With respect to meetings, persons with conflicts of interest regarding those respective agendas are requested to leave the meeting during the time which the members of the meeting are to consider the said agenda;
- 6) The acceptance of work from the Company's affiliates is practicable provided that permission of the supervisor(s) or executives has been obtained and provided that no remuneration is claimed for or received in the Employees' own personal names;



- 7) Entertainment for purposes relating to business shall be reasonable.
- 8) Employees shall not operate any businesses or make any investments which will be in competition with or which are of the same type as the business of the Company, whether directly or indirectly;
- 9) The employment of new Employees who are related to existing Employees shall be carried out in a fair manner when considering other persons with the same qualifications. In addition, Employees shall not exercise their influence in order to facilitate the employment of the aforementioned persons;
- 10) Employees shall refrain from purchasing shares or engaging in partnerships with companies whose businesses are in competition with the business of the Company, which will cause Employees to perform or refrain from performing their duties for the Company due to being concerned of their own interests in those businesses;
- 11) Work units which are responsible for procurement shall take into consideration the needs, price worthiness and quality of the products and services, and shall ensure that such acts are strictly in compliance with the prescribed rules of the Company;
- 12) Employees shall not demand benefits from the procurement. They shall remain impartial and shall not undertake any acts which will influence the decision-making process; and
- 13) Employees shall not use the Company's name in conducting transactions which are unrelated to the Company and shall refrain from entering into transactions involving dishonest practices which will damage the reputation of the Company or which is deemed unlawful.

#### 5.6 Giving and Receiving Gifts

The giving and receiving of gifts according to tradition are a means of demonstrating gratefulness or goodwill in various occasions. Notwithstanding the foregoing, the giving and receiving of gifts may influence decisions made in the course of performing work, which may consequently cause the Company to be at a disadvantage.

##### *Course of Action:*

- 1) The giving and receiving of gifts shall be of a general nature, unspecific, of modest value, and shall be appropriate given the occasion and festivity;
- 2) Employees shall not solicit or receive any gifts, assets or benefits from contractors, sub-contractors, clients (regardless whether such clients are internal, namely, Employees and other personnel in the Company, or external, meaning, for example, pharmaceutical and insurance companies), as well as business partners or persons related to the business operation of the Company in any case whatsoever, that which may have an impact on their decision-making in performing their duties;
- 3) If Employees receive gifts from persons engaged in business with the Company, and the said gifts are excessive in value having considered the norms which persons would generally gift each other, Employees shall also report the matter to their supervisor(s) in the respective chain of command; and
- 4) Employees shall not receive or give gifts in the form of cash, cheques, bonds, shares, gold, jewels, real properties, or other gifts-in-kind for their own benefit.



## 5.7 Personal Conduct and Conduct towards other Employees

Employees are valuable assets to the Company. In order to facilitate coexistence in an organization which is culturally, professionally, racially, and religiously diverse, Employees are thus encouraged to conduct themselves in unity, and treat others in a polite and respectful manner, and within the framework of the prescribed policies and guidelines for practice. The recommended course of action stipulated herein may not be inclusive of all situations. Therefore, upon encountering new problems or situations which are more complicated, Employees are requested to consult their direct supervisors or supervisors in their respective field of work. The Company deems that the direct supervisors are the Company's representatives in giving advice, guidance and solving various issues. Issues should only be referred to the Human Resources Department of the Company as a last resort.

### *Course of Action:*

- 1) Employees shall treat others equally and shall not discriminate against others on the basis of race, religion, financial status, education or other characteristics which are not directly related to the performance of their duties.
- 2) Employees shall comply with the chain of command, receive instructions and be responsible for work as directly instructed by their direct supervisors in their respective field of work and shall not, unless where necessary, break the chain of command.
- 3) Employees shall refrain from criticizing their supervisors and colleagues in a manner which will cause damage upon those persons and create disunity among the Employees group.
- 4) Employees shall be courteous and shall ensure that their attire is appropriate when considering the occasion and shall conduct themselves in a manner appropriate to their work duties and shall uphold their honor to be accepted by society and maintain the Company's image.
- 5) Employees shall conduct and act in accordance with the rules, regulations and good traditions as is deemed correct and appropriate. In addition, regardless whether such conduct is specified in writing, the Employees must exercise self-discipline and remain conscious of their actions to ensure that they behave like so at all times.
- 6) Upon encountering various new issues or situations which are more complex than the level which Employees are able to handle, such Employees shall directly consult their supervisors or the supervisors in their respective field of work accordingly.





## 5.8 Fairness

The Company is strived to promote fair competition for the efficiency and fairness of the market.

### *Course of Action:*

- 1) Employees performing relevant duties and responsibilities shall understand and strictly comply with the anti-competitive laws and regulations.
- 2) When exchanging information with competitors or trade partners, employees performing relevant duties and responsibilities shall be cautious and undertake it in an ethical way and in compliance with the law and regulations.
- 3) Upon encountering various issues or situations that are suspected that might involve anti-competitive practices, employees performing relevant duties and responsibilities shall directly report and consult to their supervisors or the supervisor in their respective field of work accordingly.

## 5.9 Safety, Health, and Environment

The Company committed to comply with relevant law and regulation to ensure Safety, Health, and Environment of all employees, suppliers (third-party workers), and minimize environmental impact it may cause from its operation.

### *Course of Action:*

- 1) All employees must acknowledge and comply with BDMS Safety, Health, and Environment Policy and perform preventive and corrective action to continuously improve organizational health and safety management system and performance.
- 2) All employees must acknowledge and comply with BDMS Earth Healthcare Policy.
- 3) Upon encountering various issues or situation that are suspect involving in non-compliance of the Safety, Health, and Environment Policy and Earth Healthcare Policy, employees shall directly report and consult to their supervisors or the supervisor in their respective field of work accordingly.

## 6. Procedures following the Receipt of Complaints

The abovementioned persons in charge of the reports shall undertake the following acts. Such persons shall:

- 6.1 Compile actual information in connection with the violation, omission or noncompliance with the Code of Conduct, whereby the person responsible for handling the related information shall disclose the said information to the person(s) to compile and investigate the complaint;
- 6.2 Evaluate and analyze the information so as to consider and decide whether or not the conduct constituted a violation, omission, or noncompliance with the Code of Conduct, and report the results of the evaluation and analysis to the authorized person accordingly;



- 6.3 Report the facts to the Board of Directors of the Company for the purpose of investigating and finding the facts and prescribing measures for further actions to be taken to cease the violation or noncompliance with the Company's Code of Conduct;
- 6.4 Notify the person who had filed the complaint, in the case where said person disclosed his/her identity; and
- 6.5 In the case of critical issues which may have material impact on or may materially damage the Company, the person in charge shall report such issues to the Chairman of the Executives and the President, who will then consider reporting the same to the Board of Directors of the Company.

## 7. Protection and Damage Mitigation for Reporters or those who cooperated in the reporting process

Reporters or those who cooperated in the investigations shall be protected and treated fairly. The Company has, in this regard, stipulated a number of rules as follows:

- 7.1 Reporters may choose not to disclose their identity should they be of the opinion that the disclosure thereof is unsafe. However, in the case that the reporter discloses his/her identity, the said person shall be notified of the progress and clarification of the facts, or the actual damage sustained may be mitigated in a more convenient and faster manner.
- 7.2 Those who have been assigned to receive reports shall maintain full confidentiality with respect to the related information and shall disclose information only to the extent necessary. They shall also take into due consideration the safety and damage suffered by the reporter or those who gave their cooperation in the investigation. The said persons shall be entitled to insurance payment from the Company, regardless whether the situation falls under termination, punishment, or any action that will have negative effects on the aforementioned employees.
- 7.3 Persons who experience difficulties or suffer damage shall receive assistance via appropriate and fair means.

Bangkok Dusit Medical Services Public Company Limited (The Company) considered as appropriate to announce Code of Conduct to be observed by all employees and used as guideline for performance of duties in order to express the intention to conduct good business practice to achieve corporate objective, based on principles of virtue, ethics, integrity and good corporate governance.

Effective from 3<sup>rd</sup> July 2023