



Bangkok Chain Hospital Public Company Limited

Anti-Corruption Policy

Table of Contents

	Pages
1. Introduction	1
2. Objectives	1
3. Definitions	1
4. Scope	2
5. Duties and Responsibilities of Related Personnel	2
6. Policies and Guidelines	4
7. Corruption Detection Measures	6
8. Policy Violation	7
9. Corrective Measures	8
10. Communication and Disclosure	8
11. Internal Audit Controls and Document Retention	8
12. Risk Assessment	9
14. Reference Documents and Authority	9
15. Review and Improvement	9



Anti-Corruption Policy

Bangkok Chain Hospital Public Company Limited

1. Introduction

Bangkok Chain Hospital Public Company Limited (the “**Company**”) commits to conducting business with honesty and transparency by adhering to social responsibility and all stakeholders in accordance with good corporate governance principles. The Company is aware of the principles of ethical conduct and is committed to preventing and opposing all forms of corruption, in which the Company has joined the Thai Private Sector Collective Action Against Corruption (CAC) by signing the Declaration of Intent on 26 April 2016.

To ensure that the Company seriously takes action to prevent and oppose corruption. Therefore, the Company has formulated policies and anti-corruption guidelines to serve as a guideline for business operations and organizational development towards sustainability.

2. Objectives

- To express the Company's intention to oppose corruption;
- To set criteria and communication to create understanding to directors, executives, employees, and all stakeholders in anti-corruption practices;
- To promote an adequate and appropriate internal control system; and
- To encourage surveillance and report corruption through designated whistleblowing channels.

3. Definitions

“**Company**” refers to Bangkok Chain Hospital Public Company Limited.

“**Subsidiary**” refers to a company in which Bangkok Chain Hospital Public Company Limited directly/indirectly holds shares more than 50 percent.

“**Corruption**” refers to requesting, accepting or agreeing to accept, giving, requesting, or certifying will give property or any other benefit to government officials, government agencies, officials of private agencies, private entities in order for those persons or agencies to use their existing powers to act, not act, expedite, or delay any act that is unlawful for the benefit of the Company, unless it is the case where the law and customs permit, the form of corruption includes the following acts:

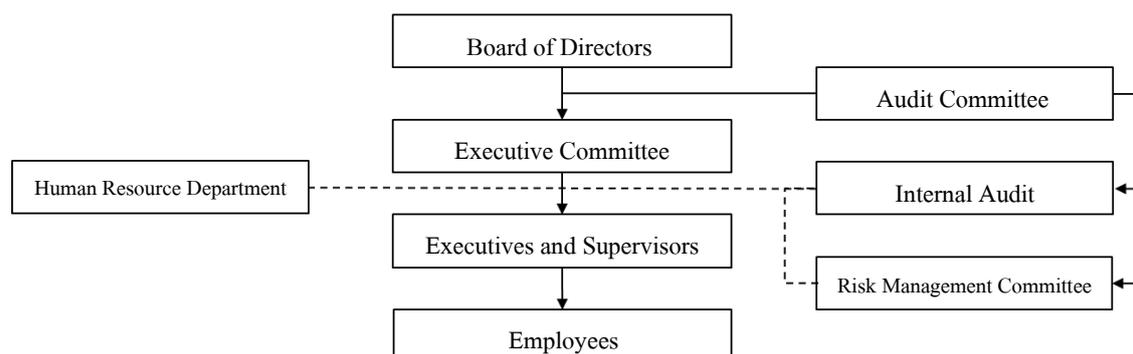
- “**Political Aid**” refers to assistance, whether financial or otherwise, to support political activities. Financial assistance can include lending money while other forms of assistance may include offering goods or services, advertising to promote or supporting a political party, purchasing tickets to an event organized to raise funds or donating money to an organization with close relationship to a political party, allowing employees to take unpaid leave from their employer, or represent the Company to participate in political campaigns.

- **“Charitable Donation”** refers to activities involving payments that are intangible. This may serve as an excuse or route for corruption, where such activities may have an underlying purpose, using charitable organizations as a cover to gain an advantage.
- **“Sponsorship”** refers to money that is intended for a business, brand, or reputation of the Company that is vulnerable to corruption as a payment for a service or benefit that is difficult to measure and monitor, in which the sponsorship may be linked to bribery to create an advantage.
- **“Gift, Hospitality, and Other expenses”** refers to receiving or giving in any form of valuables given or received by a business partner, customer, or employee of the Company to bribe and build intimacy that lead to the future advantages.

4. Scope

This Anti-Corruption Policy applies to directors, executives, employees of the Company and its subsidiaries, agents, business intermediaries, distributors of goods/services, contractors, consultants of companies who are relating to or acting on behalf of the Company and/or its subsidiaries. This policy is part of the “Business Ethics and Corporate Governance Handbook” that has been reviewed and approved by the Board of Directors Meeting.

5. Duties and Responsibilities of Related Personnel



5.1 Board of Directors

- Control and supervise the anti-corruption as a whole;
- Take the lead in demonstrating the anti-corruption commitment to their employees, business associates, and the public;
- Review, revise, and approve the Company's anti-corruption policies or manuals;
- Determine and approve processes and assign responsibilities related to anti-corruption measures to executives who have experience, knowledge, ability and qualifications in performing their duties;
- Supervise the implementation of anti-corruption policies and monitor operations to ensure that executives have sufficient resources to implement those policies; and
- Approve the process when corruption occurs or when it is reported.

5.2 Audit Committee

- Control, supervise, and maintain an overview of anti-corruption within the Company and consider the guidelines or activities proposed by the Internal Audit Department or Risk Management Committee for further action;
- Review the internal audit plan and internal control system to cover the review of operations that are at risk of being linked to corruption;
- Assess the adequacy and appropriateness of anti-corruption policies and manuals; and
- Receive reports on corruption such as annual corruption risk management reports, corruption reports, investigation reports and penalties, etc.

5.3 Executive Committee

- Support policies and create anti-corruption values in the Company and its subsidiaries; and
- Provide appropriate and sufficient procedures/manuals for operation and internal control of each department to prevent corruption.

5.4 Human Resource Department

- Provide guidelines and communication channels to raise awareness among personnel in accordance with the anti-corruption policy, including providing training to increase knowledge and competence for personnel to have sufficient potentiality to prevent corruption in the operation;
- Review the background or credibility of qualifications, abilities, and working history of personnel in key positions prior to employment;
- Designate the employment contract with conditions and regulations regarding corruption as well;
- Designate anti-corruption as one of the indicators for assessing personnel performance; and
- Requires interviews of resigned personnel, with interviews covering corruption-related activities in the Company during the operations.

5.5 Executives and Supervisors

- Ensuring that their subordinates are aware of and understand the policy and control the implementation of the measures set by the Company;
- Provide procedures/manuals for operations and internal controls with the responsibility of each department that are appropriate and sufficient to prevent corruption;
- Prevent and investigate suspected corruption activities, provides partner's background check to verify their background and financial credibility to prevent potential risks that can be exposed; and
- Urgently report the found issues to the Risk Management Committee.

5.6 Internal Audit

- Verify and review the operations to ensure they are in accordance with the policies, guidelines, authority, regulations, and laws of regulatory agencies to ensure that there is an audit system that is suitable and sufficient to prevent potential corruption;

- Assess the internal control system of each process to cover the risks of corruption.
- Providing advice on internal audits and risk assessments in accordance with the internal audit system in anti-corruption policy; and
- Report the found issues to the Audit Committee.

5.7 Employees

- Strictly study and follow the Company's Business Ethics and Anti-Corruption Policy handbook;
- Communicate anti-corruption policies and practices to business related parties;
- In case of doubt or seeing a violation of the policy, it must be reported to the supervisor directly or through the specified channels;
- Cooperate with the Audit Committee in the investigation process; and
- Be aware of risk factors and raise issues related to corruption risks to supervisors in a timely manner.

5.8 Risk Management Committee

- Participate in the preparation of risk management manuals in accordance with anti-corruption policies and practices;
- Review existing risk management measures to ensure they are appropriate and at an acceptable level;
- Regularly assess the risks that may arise from corruption; and
- Present risk management plans and measures to the Audit Committee and the Board of Directors.

6. Policies and Guidelines

Directors, executives, and employees of the Company and its subsidiaries must comply with this policy, including the Anti-Corruption Manual and Business Ethics and Corporate Governance Handbook. All personnel must not neglect or ignore when seeing corrupt actions, and giving clues to supervisors or notifying through specified channels. The Company will provide fairness and protection by using measures to protect complainants or those who cooperate in reporting corruption as required. However, those who commit corruption must receive disciplinary investigation in accordance with the regulations set by the Company. In addition, penalties may be imposed under the laws of Thailand if the act is illegal.

Directors, executives, and employees of the Company and its subsidiaries are responsible for complying with the policies and guidelines in dealing with business partners and related parties, both public and private, to avoid corruption. In addition, the Company prohibits directors, executives, and employees from demanding, acting, or accepting corruption for the benefit of themselves, families, friends, and acquaintances. Corruption can occur in the following forms:

6.1 Political Aid

- The Company has no policy to provide political aid in terms of finances, resources, or any assets of the Company, directly or indirectly, to politicians, political parties, or any political entities for the benefit of the Company's business; and
- Employees of the Company and its subsidiaries have the right to freedom to participate in political activities under the provisions of the Constitution, laws, and relevant rules, but must not impersonate employees or use any assets, equipment, or tools of the Company for the benefit of any political action. If participating in any political event,

they must be careful not to take any action that results in the understanding that the Company supports or allies with any political party.

6.2 Charity Donation

- Charitable donations are made transparently and in accordance with the law in which the objectives are clearly stated, verifiable, and beneficial to society; and
- The approval of transactions related to charitable donations will be made according to the financial line of authorized persons set by the company with reference to the Company's authority manual (Attachment 1).

6.3 Sponsorship

- The sponsorship must be verifiable that the requestor has actually carried out the requested project and that the project is beneficial to society;
- The sponsorship must have clear objective and verifiable; and
- The approval of transactions related to sponsorship will be made according to the financial line of authorized persons set by the company with reference to the Company's authority manual (Attachment 1).

6.4 Gift, Hospitality, and Other expenses

The Company realizes that building good relationships with business partners is essential to the company's continued success. Therefore, the Company has established guidelines as follows:

6.4.1 Directors, executives and employees are able to give gifts and/or hospitality to business partners, if the following conditions are met:

- It is not an intentional act to dominate, induce, or reward any person for gaining an advantage through improper action or covertly in order to obtain assistance or benefits;
- It must be given in the name of the company openly and in accordance with the relevant laws;
- It is given on various occasions that are in accordance with normal tradition or is given according to social etiquette; and
- The approval of transactions related to gift, hospitality, and other expenses will be made according to the hierarchy of authorized persons set by the company with reference to the Company's authority manual (**Attachment 1**).

6.4.2 Directors, executives and employees are able to accept gifts and/or hospitality to business partners, if the following conditions are met:

- It is given on various occasions that are in accordance with normal tradition or is accepted according to social etiquette;
- Its value must not exceed 2,000 Baht (Two Thousand Baht). And, the gifts must not be in cash or cash equivalents such as gift card, gift voucher, etc.;
- In the event that the gift exceeds the specified value and employee is in a situation where such gifts or benefits cannot be refused. The recipient must notify the supervisor immediately and make a gift receipt report

(Attachment 2). Subsequently, gifts must be sent to the office of the company secretary to be used as prizes for employees in important festivals or for approval to donate to public charities as appropriate; and

- Employees are prohibited from accepting sponsorship in the form of awards, field trips, trainings, seminars or excursions on their behalf without approval from the authorized person specified by the company

7. Corruption Detection Measures

Good anti-corruption measures can help reduce the likelihood of corruption to some extent. The corruption detection measure is a tool that helps to detect and report actions or activities that may be at risk of corruption in a timely manner. Therefore, whistleblowing and complaint mechanisms are the primary tools that can help companies detect corruption. In addition, to ensure that corruption detection measures are effectively appropriate, the internal audit function shall annually review the policy and internal controls of such measures.

7.1 Whistleblowing and Complaint Policy

If the directors, executives and employees of the Company and its subsidiaries have queries or have evidence that there are directors, executives and employees or agents acting on behalf of the company engaging in corruption. This can be reported through the following channels:

Phone	02-836-9937
Fax	02-106-4859
E-mail	report@bangkokchainhospital.com
Website	www.bangkokchainhospital.com
Postage	Submit whistleblowers and complaints (According to the attachment) To " Recipient of Complaint " Bangkok Chain Hospital Public Company Limited World Medical Hospital Building, 22nd Floor 44 Moo 4 Chaengwathana Road, Pak Kret Subdistrict, Pak Kret District, Nonthaburi 11120

Note: "Recipient of Complaint" is the Company Secretary.

7.2 Protection and Confidentiality Measures

- The Company will conceal the name-surname, address, or any information that can identify the whistleblower or the information provider and keep the information of the whistleblower and/or the information provider to be confidential which limited to those responsible for the investigation of whistleblowers only;
- The whistleblower will receive a serious response and fair protection; and
- Whistleblowers must act in good faith. If the Company finds a complaint dishonestly or has the intent to defraud, damage reputation, be insulted, hated, or embarrassed others, the Company will continue to act as it deems appropriate.

7.3 Protection of Directors, Executives and Employees

- The Company assures its directors, executives and employees that no one will be demoted, punished or affected by denial of corruption even if such refusal will cause the company to lose business benefits; and
- If directors, executives and employees believe that they have been intimidated, harassed or deterred, they can report the matter directly to their supervisors directly or through the channels specified in this policy.

7.4 Process When Receiving Whistleblowers/Complaints

7.4.1 Collection of Facts

The recipient of complaints will collect the facts and forward the matter to the Chief Executive Officer.

7.4.2 Verification and Investigation

The Chief Executive Officer will appoint an investigation committee to verify facts and investigate the matter.

The representatives of the investigation committee will be as follows:

- Human Resources Director or representative from the department;
- The supervisor in the complaint handling line must be a person who has no conflict or interest in the complainant;
- Representative from the Corruption Risk Management Working Group; and
- The secretary or representative from the Audit Committee attended to observe.

7.4.3 Implementation of Measures

The secretary or representative from the Audit Committee will conclude the report and present to the Audit Committee to consider and approve that action.

In the case of a matter that affects the Company's reputation, image or financial position or contrary to the company's business policies or related to senior management, the Audit Committee will propose to the Board of Directors for further consideration.

8. Policy Violation

- The Company will take disciplinary action against directors, executives and employees of the Company and its subsidiaries who violate the policy. and/or Anti-Corruption Practice Guidelines including direct supervisors who ignored wrongdoing or acknowledged wrongdoing but did not take correct action. Failure to recognize this policy and/or applicable laws will not be an excuse for non-compliance with this policy;
- If corruption is actually materialized, the investigation committee is responsible for presenting facts and evidence to the Audit Committee and the Board of Directors for consideration of penalties in accordance with the Company's policies and related laws. The Company has assigned the Human Resources Department to be responsible for the determination of disciplinary action from verbal warning, written warning, wage deduction, unpaid suspension, and dismissal;
- The company will consider the punishment according to the severity of the offense coupled with the past behavior and intentions of the offender which the company may penalize under one or more items at the same time;

- In the event that the penalty poses a legal risk to the Company, representatives of the investigative committee must consult with the Legal Department and Management before presenting them to the Audit Committee and the Board of Directors; and
- In the event that a representative, intermediary, distributor of goods/services, or the contractor of the company does not comply with the guidelines in this policy, the investigation committee is responsible for presenting facts and evidence to the audit committee. The Company may consider termination of the transaction with the representative, intermediary, distributor of goods/services and contractor as appropriate.

9. Corrective Measures

In case of violation of the Anti-Corruption Policy and/or Guidelines, the executives must jointly consider the corrective measures in the event of corruption. For example, improvements or additions to policies and operating manuals including internal control system, criminal and/or civil prosecution, expanding investigations to investigate corruption in other areas that may be relevant, etc. by assigning duties to the Corruption Risk Management Working Group to carry out. For the corrective action in each case, the action plan together with the implementation time frame shall be established and presented to the Audit Committee and the Board of Directors for consideration and approval for further action.

10. Communication and Disclosure

10.1 Directors, Executives, and Employees

- The Company and its subsidiaries must provide new employee orientation and continual knowledge development for directors, executives and employees so that everyone understands the anti-corruption measures, expectations, and penalties of the Company; and
- Directors, executives and employees will receive a copy of this policy in the form of a brochure. And, the full policy can be found on the company's website. (www.bangkokchainhospital.com). In addition, the Company will communicate through annual activities to ensure that everyone is aware of and understands the Company's anti-corruption policy.

10.2 Representative, Intermediary, Distributor of Goods/Services, or the Contractor of the Company

- The Company and its subsidiaries must communicate this Anti-Corruption Policy to their representatives, intermediary, distributor of goods/services, and contractors from the beginning of the business relationship and subsequently as appropriate by notifying through public relations boards, brochures, Annual Report, and company website or other methods as appropriate. This policy is to comply with the laws of Thailand against corruption.

11. Internal Audit Controls and Document Retention

- The company has established an internal control system to manage corruption covering sales- services, trade-investment, borrowing-lending- guarantee, purchasing-procurement, accounting-finance operations, human resources practice, engineering practice, operations related to obtaining medical licenses and internal data storage, etc.;
- Every department must establish a written procedure for review and approval by the department's management before it comes into effect by taking into account the separation of duties of personnel covering check and balance

between them in accordance with operating procedures to ensure transparency, independence, and the capability to prevent or detect corruption risks;

- The Company has assigned the Internal Audit Department to assess the adequacy, suitability, and efficiency and effectiveness of the internal control of the organization and to give suggestions and solutions to improve/develop internal control to be efficient and effective to prevent and detect potential corruption risks; and
- The Internal Audit Department ensures that the data and document storage is in accordance with the established policies in which physical and electronic data and documents will be stored for at least 5 years or until the end of the legal period. This is to ensure that the company has enough evidence to be used in court.

12. Risk Assessment

The Company regularly assesses the risks that may arise from corruption and reviewing existing risk management measures to be appropriate and at an acceptable level which can be referenced from the Corruption Risk Management Manual

13. Tracking and Monitoring

- The Company will continually review the Anti-Corruption Policy (at least once a year) by requiring the Risk Management Committee to present them to the Audit Committee for consideration of sufficiency as well as to report the results of the internal audit assessment to the Board of Directors regarding the practices that should be continued; and
- The internal control system and regulations are periodically reviewed by the Internal Audit Department and urgently reported detected issues to the Audit Committee To ensure that the internal control system is effective and sufficient to combat corruption.

14. Reference Documents and Authority

Principles or procedures for implementing this Anti-Corruption Policy may refer to existing documents provided by the Company. In such cases, the operating procedures and responsibilities shall be in accordance with that reference document to ensure that the operations are of the same standard. If company personnel have queries about the implementation of this manual, they can seek advice from the Internal Audit Department.

15. Review and Improvement

This Anti-Corruption Policy is under the supervision of the Audit Committee, which will be reviewed and revised annually (at least once a year) or when there is a major change that affects the business. This is to ensure that this policy complies with the Company's Code of Conduct and other relevant laws and regulations. In addition, any revision of the Anti-Corruption Policy must be approved by the Board of Directors and the revised manual must be communicated to the general public.

Attachment 1: Financial Line of Authority

No.	Description	Authorizers							Remarks
		กก	CEO/ รอง	รอง กก	ผผก	ผอ รพ	ผผ	ทผ	
1	Reimbursement of entertainment or gift expenses								Only for hospitality third parties and specify in the receiver of the hospitality / in case of giving a gift, it must be worth not more than 2,000 baht/piece/person
	Third Party <u>per time</u>								
	- Not exceeding 1,000 Bahrt						อ		
	- Not exceeding 5,000 Bahrt					อ	ท		
	- exceeding 5,000 Bahrt		อ		ท				
2	Reimbursement of Charitable Donations <u>per time</u>		อ		ท	ท			Must be approved by CEO/รอง CEO หรือ รอง กก.
3	Reimbursement of Sponsorship <u>per time</u>		อ		ท	ท			There must be a clear objective and verifiable evidence.

Notes:	กก	means	Board of Directors or the person assigned by the director
	CEO	means	Chief Executive Director
	รอง CEO	means	Deputy Chief Executive Director
	รอง กก	means	Executive Vice President
	ผผก	means	Department Director (Head Office)
	ผอ รพ	means	Hospital Director
	ผผ	means	Department Director/Branch Manager
	ทผ	means	Department Manager/Head of Department Branch
	ท	means	Review
	อ	means	Approve

Attachment 2: Gift Receipt Report Form Property or any other benefits of employees

Dear.....

On I, (Mr./Mrs./Miss)

Position..... Unit/Department/Division..... Telephone

receive gifts, assets or any other benefits as follows:

No.	Type of gift	Received from	Reason for Receiving	Action
1.				<input type="checkbox"/> Regarded as personal benefit <input type="checkbox"/> Share with Colleagues <input type="checkbox"/> Return to the giver <input type="checkbox"/> Deliver to the company secretary unit <input type="checkbox"/> Others.....
2.				<input type="checkbox"/> Regarded as personal benefit <input type="checkbox"/> Share with Colleagues <input type="checkbox"/> Return to the giver <input type="checkbox"/> Deliver to the company secretary unit <input type="checkbox"/> Others.....
3.				<input type="checkbox"/> Regarded as personal benefit <input type="checkbox"/> Share with Colleagues <input type="checkbox"/> Return to the giver <input type="checkbox"/> Deliver to the company secretary unit <input type="checkbox"/> Others.....

Name.....Reporter

(.....)

Comments from Department Head

Permission is granted for personal benefit

Inappropriate to take it personally and return to the giver or to deliver to the company secretary unit

Name..... Department Head

(.....)