

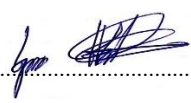

 โรงพยาบาลราชพฤกษ์ Ratchaphruek Hospital	Document Type : Hospital policy
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Title : Anti-corruption and bribery Policy	Document No. : HP – GLD - 014 Standard Type : GLD
Issue Date: 06 August 2022	Page No. : 1/ 11
Assignment and Person Responsible to Summarize Quality Policies: All Employees and Workers at all levels in Ratchaphruek Hospital Public Company Limited.	
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Provider	Reviewer	Approver
 (MS.CHULARAT SIRISINGH) COMPANY SECRETARY DATE....06.....AUGUST....2022....	 (DOCTOR TEERAWAT SRINAKARIN) CHIEF EXECUTIVE OFFICER DATE....06.....AUGUST....2022....	 (MR.SUDHON SRIYAPANT) CHAIRMAN DATE....06.....AUGUST....2022....

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Ratchaphurek Hospital Public Company Limited “the Company” realizes the significance of anti-corruption and is committed to conducting its business operations in compliance with applicable laws, good governance and integrity practices as stated in company Missions, Corporate Governance Policy, Code of Conduct, Core Value, and high ethical standards as well as being responsible to society, the environment, and all stakeholders, so that the Company can operate its business with transparency, fairness, and accountability.

1. Objective

To ensure that the Company has a policy to define responsibilities, guidelines, and appropriate operational requirements to prevent corruption in all of the Company’s business activities and that all business decisions and operations which may give rise to risk of corruption are carefully considered and executed, the Company has formulated this written Anti-Corruption Policy as a clear guideline for business operations and development towards a sustainable organization.


2. Scope and Applicability

Directors, Executives at all levels, staff and all employees of the Company and its subsidiary companies, whether on a permanent, fixed-term, or temporary employment basis, in every business unit and operation site.

3. Definitions

Vocabulary	Means
Company	Ratchaphurek Hospital Public Company Limited
Directors	means any and all directors of the Company.
Audit Committee	means a group of independent directors who are in charge of corporate oversight to financial reporting and disclosure, regulatory compliance, risk management, and other related corporate issues.
Asset Misappropriation	means any action leading to the illegitimate possession of the Company's assets causing a loss of the Company's assets, opportunities, or other benefits, for personal or others' gains, including cash and non-cash assets.
Corruption	means any forms of bribery, whether by way of offering, promising to give, giving an undertaking, demanding, or accepting money, assets, or any other undue benefits to or from any government officer, government agency, private organization, or responsible person, either directly or indirectly, so that such

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	<p>person exercises his/her power or refrains from performing his/her duties, thereby causing the Company or any other person to obtain any undue benefits or business advantages.</p>
Recipient	<p>means any government officer or representative, private company officer, politician, trading party, customer, labor union, relevant stakeholder and any individual, who supervises or supports the supervision of or causes Company to derive any benefits, whether directly or indirectly.</p>
Staff	<p>means executives at all levels, staff and all employees of the Company and its subsidiary companies, whether on a permanent, fixed term, or temporary employment basis, in every business unit and operation site.</p>
Delegation of Authority	<p>means the list of authority that CEO has further delegated to executives at various levels for day-to-day operation in order to approve various types of transactions based on value thereof and levels of executives.</p>
Facilitation Payment	<p>means unofficial payments made to secure or expedite an action by a government official, policeman or other person of authority. It is normally a small amount that is paid to a public official in order to secure or expedite the performance of a routine action.</p>
Fraudulent Statements	<p>means an intentional distortion of financial reports - for instance, financial statements and financial recordings – or non-financial reports, as to conceal misappropriation of assets or activities for personal or other's interests, resulting in misstatements in those reports and records.</p>
Political Contribution	<p>means financial and in-kind gifts donated or transferred to a political party, politician or political candidate. This may include sponsorships, gifts of property or services, advertising or promotional activities endorsing a political party, the purchase of tickets to fundraising events, subscriptions and affiliation fees, money to meet expenses, and loans, property, services and other facilities at less than market value. The release of employees without pay from the employer to undertake political campaigning or to stand for office could also be included in the definition.</p>

4. Policy Statement / Principles:

- 4.1. Directors, executives, and staff must not engage in any form of corruption either directly or indirectly or through a third party.

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4.2. To ensure clarity regarding activities involving high risks of corruption, directors, executives and staff shall exercise caution and comply with the Code of Conduct and guidelines as follows:

4.2.1. Gift, Hospitality, and Entertainment Gift and Hospitality Refrain from offering, granting and accepting of gifts as well as any kind of entertainment, except those in compliance with the Code of Conduct and Standard Practice Manual for Accepting and Offering of Gifts, Hospitality, or Other Similar Forms of Reward.

The Company expects all employees to use their discretion to evaluate each situation to determine whether gifts or entertainment are reasonable and do not amount to bribery. Also, is it in accordance with social norms or not? Receiving gifts in all cases must not affect to the operations and business decisions of the Company See the Company's Gifts and Entertainment Guidelines for more details about our gift guidelines.

4.2.2. Donations

Staff can provide charitable donation or contribution not exceeding the value indicated in the Delegation of Authority unless approved in writing by CEO, and it must be made certain that such donations shall not be abused as a pretext for bribery.


In addition, the board of directors, executives, and employees must not use their positions to exert pressure. Have business partners or third parties donate to charity.

4.2.3. Political Contribution

The Company shall maintain political neutrality and shall not act in the interest of or provide financial or other support to political parties either directly or indirectly. Directors, executives, and staff of the Company shall strictly comply with the Code of Conduct, However, political assistance or participation in political activities must be done on behalf of oneself. Not on behalf of the company. The company does not act in a way that favors or supports financial or other forms of political parties, whether directly or indirectly. Directors, executives, and employees of the company must comply with the business ethics manual. business The Company strictly uses political rights.

4.2.4. Facilitation payment (Facilitation Payment) Business relationships or transactions with the government sector must be conducted with honesty, transparency and strictly in accordance with various rules and regulations. Facilitation payments to government officials are prohibited.

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- 4.3. The board of directors, executives, doctors, and employees must not neglect or neglect to report actions that are considered corruption through the channels specified by the company. The company will provide protection to those who report such actions.

5. Roles and Responsibilities

- 5.1. The Board of Directors is in charge of and responsible for establishing an anti-corruption policy and putting in place effective anti-corruption systems in order to ensure that management recognizes the significance of anti-corruption efforts and cultivate an anti-corruption mindset as part of the Company's organizational culture.
- 5.2. **The Audit Committee** is in charge of and responsible for reviewing and ensuring that the Company has duly complied with the Anti-Corruption Policy, financial and accounting reporting systems, internal control systems, internal audit systems, and risk management systems to ensure their conformity with international standards as well as their prudence, suitability, up-to-date status, and effectiveness.
- 5.3. **The Chief Executive Officer (CEO)** is in charge of corruption risk assessment in the operational procedures which may give rise to corruption, determining such procedures to promote and support the Anti-Corruption Policy, and communicating the same to staff and all parties concerned, including reviewing the suitability of applicable procedures and measures to ensure alignment with changes in business, rules, regulations, and legal requirements.
- 5.4. **Executive Management** led by the Chief Executive Officer, is responsible for demonstrating a visible and active commitment to anti-fraud and corruption initiatives, supervising the implementation of the risk management plan, systems, procedures, and internal controls for the prevention, detection, and response to Fraud and Corruption. Executive Management shall support and foster the culture of compliance and adherence to the anti-fraud program of the Company, assign competent and experienced personnel to oversee the relevant policies and procedures and provide sufficient resources for anti-fraud and corruption measures
- 5.5. **Internal Audit** is in charge of and responsible for reviewing the Company's internal control system and reviewing compliance with relevant anti-corruption policies and procedures to ensure that the Company's internal control system is appropriate, efficient, and adequate for any potential corruption risk, as well as reporting internal audit results and any urgent matters to the Company's senior executives and relevant committees on a regular basis and in a timely manner.
- 5.6. **Enterprise Risk Management / Risk Management Team** is in charge of assessing and reviewing the corruption risks associated with the Company's business operations annually and shall be

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reported to the Audit Committee. All directors, executives, and staff are obliged to read, familiarize and comply with this policy. Any action that may lead to a violation of this policy must be avoided. It is the duty of all directors and staff to obstruct, investigate, monitor, and report any acts of corruption.

- 5.7. **Procurement Manager** shall be responsible for evaluating business partners, vendors, contractors, and service providers to ensure reliability, creditability, reputation, and competency, communicating policies and procedures relating to anti-fraud and corruption to all relevant business partners.
- 5.8. **All employees** of the Company are responsible for reading, understanding, and complying with all policies and procedures in relation to Fraud and Corruption, Code of Conduct, promptly reporting Fraud or any suspected fraudulent activities via whistleblower channels, providing information to assist in the investigation process.

6. Reporting of Fraud and Corruption

- 6.1. The Company encourages directors, executives, and staff to raise concerns about any suspicion of misconduct under the Corporate Governance, including corruption at the earliest possible stage through the Whistleblower Channel.
 The investigation committee will investigate complaints received in accordance with the corruption risk management policy. The company has created a policy for accepting complaints and providing protection to complainants. To protect employees who make complaints who report any wrongdoing that is against the law, rules, regulations, anti-corruption and bribery policies. Principles of Corporate Governance and Business Ethics Manual
- 6.2. Incident Reporter / Seeing corruption and accepting bribes Whether directly or indirectly, will be protected as appropriate. There will be no negative impact from such reporting.
- 6.3. All complaints and investigations will be treated confidentially to the extent possible. and information will be disclosed strictly as necessary. The identity of the complainant is usually revealed to the relevant parties during the investigation. and the Human Resources Director will take appropriate steps. To ensure that complainants are protected from retaliation during and after an investigation. All information related to a complaint or investigation under this policy will be kept in a secure file within the Human Resources department. and/or internal audit department

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7. Measures against Fraud and Corruption

7.1. Preventive Measures

1) Publish policy and Communication

The Company shall arrange for internal communication through training and orientation to ensure that all staff understand the Anti-Corruption Policy. The Company shall publicly announce and disclose such policy in RPH’s Annual Report and website, and communicate the same to all stakeholders.

2) Procurement Policy and Related Work Procedures

The Company has issued and implemented the Procurement Policy and related work procedures since 2017 to govern purchasing requisition and order placement, billing and collection of payments for goods and services, claims and return of goods and services, imported goods, bidding and tendering, logistic management, and goods procurement. All steps of the procurement procedure shall proceed through the so-called Supply Chain. which will systematically record data for reference and for auditing purpose.

3) Accounting Record System


The consolidated and unconsolidated financial statements have been prepared in accordance with the Thai Financial Reporting Standards (TFRS), which have largely adopted the International Financial Reporting Standards (IFRS). The TFRS has been approved by the Federation of Accounting Professions. In addition, the preparation of financial statements shall follow the requirements of the Office of the Securities and Exchange Commission.

4) Assessment and Prevention of Corruption Risk in the Business

The Company has performed the risk management covering strategic risk, financial risk, risk in coal and power business, risk from political and regulatory changes in the countries in which it operates, and HSEC risk for many years. Currently, the Company has executed the risk assessment for anti-corruption in all operation and support functions. The process starts with a comprehensive activity-based identification of corruption risk factors of business units and their possible causes. Risk management and mitigation measures are provided and the assessment is performed at least once a year.

5) Internal Control System

The Board of Directors has designated the Audit Committee to regularly review the adequacy and appropriateness of internal control system for the Company’s risk management so as to ensure effective, efficient, and transparent business operations. Since 2013, the Company has revised its internal control system to adopt an international

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standard or the COSO (the Committee of Sponsoring Organizations of the Treadway Commission). COSO Internal Control shall focus on Commitment to Integrity and Ethical Value, the Board Responsibility, Organization Structure and Authority, Employees' Commitment to Competency and Accountability, Business and Corruption Risk Assessment, Communication, and Control-Monitor-Report Procedures.

6) Corporate Governance Policy and Code of Conduct

The Board of Directors has formulated the Corporate Governance Policy and the Code of Conduct to strengthen the corporate governance awareness through continuous corporate governance activities, and fully supports corporate values called "Banpu Heart". The documents are available in Thai, English, Indonesian, and Chinese, which aim to set the standard practice guidelines for all operation sites. All directors, executives, and staff shall read, understand, and comply with such provisions as stated in the Corporate Governance Policy and the Code of Conduct.

7.2. Corrective Measures

1) Corporate Fraud Management

Suspicious issues or circumstances received either through the Complaint Channel or the Internal Audit Report shall be processed through the Corporate Fraud Management Procedure. The Investigation Committee shall conduct a fact-finding process and provide the results and recommendations to CEO for consideration and final decision.

2) Monitoring and Reporting


The complaints related to corporate governance from both the Complaint Channel and the Corporate Fraud Management Procedure will be reported to the Corporate Governance and reported to the Board of Directors accordingly.

Moreover, the issues investigated by the Internal Audit Department will be monitored by the Audit Committee on a monthly basis and reported to the Board of Directors on a semi-annual basis.

In addition, the Audit Committee will follow up on issues investigated by the Internal Audit Department every 3 months and present a report to the Board of Directors every 3 months or at the meeting.

8. Enforcement and Penalty

Corruption in the organization It is a violation of the company's ethics and regulations. Which must be considered for disciplinary punishment according to the regulations set by the company. However, the company has a policy not to reduce positions. Punish or give negative consequences to employees who

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refuse to commit fraud and corruption. Even though that action will cause the company to lose business opportunities. In addition, there may be legal penalties if the action is illegal as follows:

1) Disciplinary

the Company shall impose the disciplinary penalty according to the Company's regulation.

- Verbal Warning
- Written Warning
- Be suspended from job
- Dismiss

2) Legal punishment

Civil and commercial laws/ Criminal laws.

9. Flow Chart / Work process

- None

10. Cautions / Suggestions / Additional comments

If any employee who found any violation or failure to comply with the harassment must reports directly or indirectly to that employee, or if one of the parties is in a supervisory capacity in the same department in which the other party works, the parties must notify the Humanize Resource Director or Chief Executive Officer other appropriate corporate officer. Any person who is found to have violated this aspect of the policy will be subject to discipline up to and including termination of employment.

11. Monitoring and Measuring Process


The Company shall consider amendment to Non-Discrimination and Anti-Harassment Policy as well as manuals, requirements, procedures, and all relevant forms in consideration of the accuracy, appropriateness, adequacy.

12. Review implementation process

The Company will regularly review its anti-corruption and bribery policy, taking into account changes that are significant to the organization.

13. Reference

- 13.1. Code of Ethics and Business Conduct of Ratchaphruek Hospital Public Company Limited
- 13.2. Table of Authority: TOA of Ratchaphruek Hospital Public Company Limited

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14. Policies Related Documents

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|-----------------------------------------------------|--------------|
| 14.1. Whistle Blowing Policy | (HP-GLD-015) |
| 14.2. Non-Discrimination and Anti-Harassment Policy | (HP-GLD-011) |
| 14.3. Human Rights Policy | (HP-GLD-013) |
| 14.4. Diversity and Inclusion Policy | (HP-GLD-021) |

Note: This policy is approved by the Board of Directors Meeting No.3/2022 on 6 August 2022 and is effective from 6 August 2022 onward.