



(Translation)

Fraud Prevention and Anti-Corruption Policy

Corruption is described as an action or abandonment of duty or the illegitimate use of power against law, moral, regulation or policy of the company to the benefit of any private interest.

Hence, executives and staff must not act or provide any support to such corruption in any case as well as to critically perform his/her duty in accordance with anti-corruption policy, including to promote and participate to internal auditing process to create a joint solution against fraud or corruption which may take place in the organization.

The company has implemented the following mechanism to jointly prevent and combat all types of corrupt activities;

1. Risk assessment

- 1.1 The company provides future risk assessment in any operation and prioritize the risk matrix for further internal planning and risk management framework on future operational risks.
- 1.2 The company provides internal auditing according to risk assessment planning that set above by assigned internal auditor who experienced and suitably qualified to ensure that the internal auditing will help the company achieving goals. The auditor has to be able to verify all designated operational entities in accordance with rule and regulation for effective and transparent operation followed the guidelines on corporate governance.

2. The guidelines for risk control and prevention

- 2.1 The company has established procurement, contract processes and disbursement procedures by setting an account spend limit, table of authorities and the purpose of transaction which supporting documentation must clearly show as well as verified by the internal auditor who experienced and suitably qualified.
- 2.2 The company has established principles for charitable donations including principles for entertainment or gifts as part of the company's code of conduct as follow;
 - **Charitable giving and public contribution**
Offering or charitable contributions shall be considered as charitable purposes only and relevant supporting document must be clearly shown and followed by the rulemaking process of the company.
 - **Giving and receiving of gift and entertainment**
Directors, executives or staff shall not receive or give gift or accept/offer such unnecessary entertainment or over than their status from/to individuals or business alliances. On the other hand, the act of offering or promising even unsuitable payment to joint venture or staff of that joint venture or business alliance that my lead to motivation must be avoided



as well as all kinds of inappropriate act that always aware that any act must abide by transparent condition set out and can be verified.

In addition, if gift has been received with unusual value and over than their status in traditional occasion, Directors, executives or staff must avoid receiving such gift at all costs. In this case, the directors shall report to Board of Directors or executives or staff shall report to their supervisor respectively for acknowledgement.

- 2.3 The company provides focal point system to control finance, account and data including other related framework to ensure that such financial transactions are subjected to the purposes of approval and for transparency in corporate governance.
- 2.4 Directors, executives and staff are required to combine fully with all guidelines of corporate governance and to avoid any non-transparent act that may lead to corruption according to the policy provided by the Board of directors and/or management . Failure to do so could result disciplinary action to that person. If that person is in executives or staff level, the company shall apply disciplinary action up to all rules and regulations of the company and its subsidiaries as well as requirements of regulatory agencies or related laws.
3. The company shall communicate such guidelines of corporate governance including policy of fraud preventing and anti-corruption to department within the company through different channels such as staff training, intranet and company's website to inform the relevant people in order to comply fully with those guidelines.
4. The audit committee of the company shall audit and verify the sufficient corporate governance of the company according to related policy or guidelines. If it is found or hesitant about any act that affected to the transparency of corporate governance, the committee shall report such case to the Board of directors and/or President (if appropriate) for further action in the mean and appropriate time.
5. The company has established the channels in case of seeing any illegal act similar to corruption. The reporter shall be protected (Whistleblower Policy). In connection with guidelines of corporate governance, the company categorizes whistleblower types as follows;
 - Any illegal action against the company regulation or code of conduct of staff
 - The acts against code of conduct of Directors
 - The act against the professional conduct and ethics for medical practitioners
 - The unusual of financial report and transactions
 - Any affected reputation and image of the company



Complaint /Notification Channels

Type of Complaint/Notification	Channels
Unlawfully acts, corruption against the company regulation and code of conduct of staff	Senior Vice President –Corporate HR /or the incumbent position of Corporate Human Resource Department
The act against code of conduct of Directors	Chairman of the Board of Directors /or Chairman of Audit Committee /or Company Secretary
The act against the professional conduct and ethics for medical practitioners	Chief of Operations- Medical Affairs /or Chief of Doctors
The unusual of financial report and transactions	Chairman of Audit Committee
Matters that affected to reputation and image of the company	President

Whistle-blower protection mechanism

1. The company shall consider as the policy in order to keep the information (full name) of whistle-blower confidential to protect any impact that may occur to the whistle-blower who inform such useful information to the company and disciplinary action will be taken to executive who undertakes the responsibility of such information disclosure.
2. The company has provided protection and care to the whistle-blower who is affected by information disclosure that benefits to the company.