

Anti-Corruption Policy

Praram 9 Hospital Public Company Limited (the “Company”) conducts its business with transparency, ethics and based on the good corporate governance principle, in alignment with the laws governing the prevention and anti-corruption, being bribed or bribing officer in public and private sectors. The Company defines the organizational structure dividing the accountabilities, working process and clear cut the chain of command at each unit so that there will be checks and balances among the units properly subject to the following practices:

Accountabilities of Directors and Executives

Directors and the executives are responsible for the prevention and scrutinizing the malpractices and errors by continually using the adequate system of accounting and internal control. In any case, all directors and employees at every level are required to perform their duties in good faith and bearing themselves with ethics and moral standard.

Risk Management

Directors, the executives and the concerned persons must identify the circumstance uncertain probable happening and affecting the Company in order to find the measure in response and mitigate those risk within the acceptable level that it will not cause material adverse effect on the business operation under the Company’s objectives. The Company shall organize the risk management, including the identification and determination, of various risk factors as well as the assessment of the impacts resulting from such risk, the determination of controlling, and tracking the internal control, and the responsive action against the risk, including the following up of the assessment of the preventive capacity, and finding out the malpractice, error and performance or non-performance with the regulation.

Internal Control

The Company has organized the internal control system for enhancing the efficiency of the work and risk mitigation concerned with the business characteristics. The proper system of an internal control consists of preventive and detective controls which are the instruments mitigating the opportunity and inducement for unlawful undertaking and the malpractices, based on the separation of job duties such as the segregation of duty among the purchasing unit, the treasury unit and the accounting unit. In addition, there are the procedure of performance assessment. The executives will be reported and noted the deficiencies or suspicious situation promptly. The preventive control shall then be developed in appropriate manner with respect to the assessment of the said internal control system. In this regard, the Internal Audit Department will involve in the mission.

Moreover, the Company has set the guidelines of practices for the directors, executives and employees of the Company with regard to the following matters:

1. No director, executive, and employee of the Company shall do or admit any malpractice and corruption in all aspects, either direct or indirect action, regardless of the unit concerned. There must be the re-checking of the performance under this Anti-Corruption Policy on regular basis, consistent with the revision to the rule, regulation and requirements of laws.

2. Director, executive and employee of the Company have to report the Company any action likely regarded as fraudulent corruption concerned with the Company by notifying the supervisor of the matter or the responsible person and cooperating with the inspection on fact-findings.
3. The Company shall ensure fairness to and prevent the person informing the fraudulent corruption as well as the person cooperating with such report and the investigation process thereof.
4. The Board of Directors and the executives of the Company have to behave themselves as a role model for anti-corruption and to have duty supporting and encouraging the anti-corruption policy in communication with the employees and related parties, including the review of suitability of the various policies and measures proper for the conversion of the business, rule, regulation and legal requirements.
5. A person who practices or endorses corruption must be thoroughly dealt with the disciplinary action announced by the Company and may be punished according to the laws applicable thereto.
6. The Company shall prepare training courses and disseminating the knowledge to directors, executives and employees of the Company to understand for compliance with the Anti-Corruption Policy and promoting the moral principle, honesty, accountability, and job duty invoked to justify.
7. The Company assist the contract party, trader or any person performing the obligation in connection with the Company to report the violation of the Anti-Corruption Policy of the Company.
8. The Company has the policy on nomination or recruitment of personnel, promotion, training, performance evaluation and the remuneration determination for the staffs and employees of the Company in order to prevent the fraudulent corruption in the organization and assuring the security to staffs and employees of the Company.
9. For operational clarity in high risk to occur fraudulent corruption with respect to the following matters, all directors, executives and employees of the Company have to behave carefully and check in great details:
 - 9.1) Offering or receiving present and welcome party must be transparent, lawful and under normal commercial or customary practices at reasonable value.
 - 9.2) Offering and receiving donations or financial contribution must be transparent, lawful to ensure that such donation or financial contribution are not used as a scheme to conceal bribery.
 - 9.3) In business undertaking, connection, negotiation, bidding and any operation with government agencies or private sector must be transparent and lawful. In addition, all directors, executives, staffs and employees of the Company are not allowed to offer or receive any bribery in any step of business conduct.