

## **Anti-Fraud and Anti-Corruption Policy**

Praram 9 Hospital Public Company Limited (the “Company”) has been operated on the basis of transparency, ethics and adherence to principles of good corporate governance and compliance with the laws relating to the prevention and suppression of fraud and corruption, giving or receiving of Bribery to or from government officials or the private sector. The Company has established an organizational structure to divide duties, responsibilities, work processes. and the chain of command in each unit to be clear so that there shall be a balance of power and properly tightening the cross-investigation between them as follows:

### **Anti-fraud and Anti-corruption**

Directors, executives and employees of the Company are prohibited from accepting any and all forms of fraud, both directly and indirectly, whether in the capacity of the giver or the receiver, with regards to the giving or receiving of things, money, property, gifts, entertainment, collections, donations and other benefits to or from government agencies. or a person doing business with the Company. This policy is applicable to any and all employees, business partners, clients and stakeholders both domestically and internationally.

#### **1. Definition**

“**Corruption**” means any types of bribery such as an offer, promise, guarantee, inquire, pr acquisition on money, property or any other inappropriate benefits, with a government official; government sector, private sector or those who have duties, whether directly or indirectly so that such person could proceed or disregard his/her performance of duties in order to acquire or maintain business or recommending a business to a particular company or to acquire or preserve any inappropriate business benefit, except for the cases where the permission of law, order, notification, regulation, local custom, or trade custom is granted.

“**Fraud**” means seeking unlawful benefits for oneself or any other such as cheating, defrauding, and embezzlement.

“**Bribery**” means an offering or accepting things, gifts, rewards or any other benefits for the sake of oneself, or from a person trying to induce something dishonest, illegal, or unethical to the Company taking place.

“**Employment of Government Employees**” means hiring person from the public sector to work with the private sector for the benefit of being the person having the authority to perform the duties of a government agency which may have a conflict of interest affecting the image, credibility, and integrity in performing impartial governance.

“**Government Employee**” means a person having powers and duties to work for a government agency such as a government official, employee, public organization employee, state enterprise employee, holder of political position, including the retired government employee influential in the involved transaction.

“**Facilitation fee**” means small expenses paid to government officials informally. And it is given only to ensure that government officials will carry on the process. or to encourage faster proceeding.

**“Receiving or granting things or any other benefits”** means the receiving or granting any privileges, including support in the form of money, property, things or any other benefits as a gratitude, reward, or for building a good relationship.

**“Traditions”** means the traditions of society, and the traditions of the Company that have been carried out for generations such as New Year's Day, Songkran Day, etc., also including the foundation day of the Company.

**“Giving or receiving of sponsorship”** means giving or receiving money, things, or any other benefits with the objective of business operation, goods brand, or the Company's reputation.

**“Charitable Contributions”** means giving of money, things, or any other benefits only for the public benefits, not used for returns or Bribery such as foundations, temples, charities, hospitals, or other public benefit organizations, truly certified and reliable.

**“Political Contributions”** means the assistance in the name of the Company by providing money, things or any other benefits to facilitate, support, or for the benefit of political parties, politicians and political activities unless it is a legitimate support according to the democratic process.

**“Conflict of Interest”** means a situation in which private interest is opposed to common interests; an illegal exploitation; an abuse of position and discretion; a lack of morality; a lack of transparency and fairness; and a lack of independence.

## **2. Responsibilities**

- 2.1 Board of Directors** is obliged and accountable to determine the policy, monitor the formulation of an effective system supporting anti-corruption to ensure that the management intensively concerns, emphasizes, and cultivates anti-corruption mindset as the Company's culture.
- 2.2 Audit Committee** Is obliged and accountable to review the financial and accounting reporting systems, internal control system, internal audit and risk management system to ensure that they are internationally standardized, concise, appropriate, updated and efficient.
- 2.3 Chief Executive Officer and the management** are obliged and accountable to establish a system to encourage and support the Anti-corruption policy to communicate to employees and related parties, including reviewing them to be appropriate in accordance with various situations that have changed, such as business conditions, regulations and various legal requirements, etc.
- 2.4 Internal Auditor** has duties and accountabilities to examine and review the operation to ensure that it is in line with the policies, practices, authority. regulations, laws and regulatory requirements to ensure that appropriate control systems are in place and sufficient to encounter with the corruption risks and report to the Audit Committee.
- 2.5 Directors, executives and employees** must perform their duties in accordance with the guidelines set forth in this policy, and in the event that any action that violates this policy is found, they must promptly report to their supervisors. or through the reporting channels specified in this policy.

Description	Work Flow
<ol style="list-style-type: none"> <li>1. The Board of Directors reflects the commitment to prevent fraud and corruption by bestowing the Chairman of the Board of Directors to sign in the declaration of intent to combat fraud and corruption.</li> <li>2. Board of Directors appoints the Audit Committee to verify 71 checklists of self-assessment form.</li> <li>3. The Audit Committee reviews 71 checklists of self-evaluation form and proposes to the Board of Directors for approval to further submit to Thailand's Private Sector Collective Action Coalition against Corruption (CAC) council for obtaining CAC certification.</li> <li>4. Top management communicate with all executives and employees in the organization for awareness of the policy and guidelines for showing commitment and measurement method to reflect performance results.</li> <li>5. The management requires the following up and assessment with regards to the anti-fraud and anti-corruption measures on annual basis.</li> </ol>	<pre> graph TD     Start([Start]) --&gt; BOD[The Board of Directors passes a resolution to issue a Declaration of Intent to join Thailand's Private Sector Collective Action Coalition against Corruption (CAC) to be signed-off by Chairman of the Board of Directors]     BOD --&gt; AC[Audit Committee reviewing the Self-Assessment Form on combating fraud and corruption measure]     AC --&gt; AC_Review[The Audit Committee reviewed 71 checklist of self-evaluation form and presented them to the Board of Directors for approval to seek for CAC certificate for submission to the Board of Directors]     AC_Review --&gt; TM[Top management communicate to all internal units for awareness and establish good practice to demonstrate the aim for implementing the Anti-fraud and Anti-corruption Policy by performing the duties as set forth in the evaluation form.]     TM --&gt; AA[Provide an annual assessment.]     AA --&gt; End([End]) </pre>

### 3. Good practice to counter fraud and corruption

(1) No director, executive or employee is allowed to involve in or accept fraud or corruption prevail in any form, either directly or indirectly. This extends to all the Company's related units. The Company shall constantly review the compliance with this Anti-fraud and Anti-corruption Policy to be in line with the applicable rule, regulation and legal requirements as revised from time to time.

(2) Directors, executives and employees of the Company have a duty to report to the Company of any suspected fraud and corruption related to the Company by notifying the supervisor or the responsible person and cooperate in the factual investigations.

(3) The Company will provide fairness and protection to the complainant reporting fraud and corruption, including those who cooperate in reporting and investigation of fraud and corruption procedure.

(4) The Board of Directors and executives of the Company must act as a role model. to combat fraud and corruption and to promote and support the Anti-Fraud and Anti-Corruption Policy to communicate to all employees and related parties including the review of suitability of various policies and measures to accommodate the change in business conditions, rules, regulations, and legal requirements.

(5) The person committing fraud and corruption shall be subject to disciplinary action in accordance with the regulations prescribed by the Company and may be punished according to the law if such act is an offense under the law.

(6) The Company shall provide training and dissemination of knowledge to directors, executives and employees of the company to have an understanding on compliance with the Anti-fraud and Anti-corruption Policy and morality promotion, integrity, accountabilities and their own undertakings.

(7) The Company encourages the counter party, partner or other person to perform duties related to the Company to report the violation of the Company's Anti-fraud and Anti-corruption Policy.

(8) The Company has a policy to recruit or select personnel, promotion, training, performance assessment, and setting fair and adequate remuneration to personnel and employee of the Company to prevent fraud and corruption within the organization and to establish security for personnel and employees of the Company.

#### **4. Other policies supporting the measure combating fraud and corruption**

In carrying on the business, communication, negotiation, bidding and any other operations with agency of public or private sectors must be transparent and allowed by the law. In addition, directors, executives, personnel and employees of the Company must not give or accept Bribery at all business transactions as follows:

**4.1 Political Contributions.** The Company shall operate the business non-politically, not involved with or participated in any political parties or political power person. The Company shall not use funds or resources to support, either directly or indirectly, political parties or politicians, in all respects.

**4.2 Charitable Contributions.** For the reason that Charitable Contributions can involve payments made without tangible return and may be used as a subterfuge or route for Bribery. Therefore, in order not to make charitable donations with an ulterior motive, the Company has established policies and guidelines regarding charitable donations, a review and approval procedure for charitable contributions review process and details of the control as follows:

- (1) The donation must be provable that there are actual activities under the charitable project and there are activities to support the achievement of the project objectives and bring real benefits to society or to implement the business purposes with social responsibility.
- (2) The donation must be provable that such charity is not concerned with reciprocal benefits to any person or unit, except for the announcement of honors in general practice, such as the mounting of logo, etc.

**4.3** Monetary sponsorships, one of the means of business public relations, unlike charitable contributions, are made for business objectives, brand o of the Company. This may be done for purposes of the Company's business, brand or reputation. They can present risk as they involve payments made for services or benefits that are often hard to measure and track. Monetary sponsorships can be steered for bribery purposes. Therefore, the Company has defined the policies and rules regarding monetary sponsorships, review procedures and detailed controls as follows

- (1) Monetary sponsorships must be provable that the applicant has actually performed the activities under the project and that it has been taken to support the achievement of the project objectives and bring real benefits to society or to implement the business purposes with social responsibility.
- (2) Monetary sponsorships must be provable that giving or receiving of monetary sponsorships or any monetary benefits, such as giving or receiving accommodation and food, etc., is not concerned with reciprocal benefits to any person or unit, except for the announcement of honors in general business practice.
- (3) As being a grantor or recipient of the monetary sponsorships, the Company shall have a register of applications showing identity of the grantor or recipient, as the case may be, and the objectives together with all supporting documents to be presented to the Company's authorized approver to consider approving according to approval hierarchy of the Company.

**4.4 Facilitation fee** The Company does not have a policy to offer any Facilitation Fee to government officials to encourage the outcome of more rapid transactions.

**4.5 Paying and receiving money in connection with gifts, hospitality and other expenses reception fee and other expenses.** To support and encourage the Anti-fraud and Anti-corruption Policy of the Company and to prevent risks related to corruption in the future, the Company therefore defines the policy on The Company's gift giving and receiving as follows:

- (1) Directors, executives or employees shall not demand, receive or agree to receive money or any other benefits from business related persons.
- (2) Directors, executives or employees may accept or give gifts in custom for the value no more than THB 3,000 (Three Thousand Baht). However, if the value is more than 3,000 Baht (Three Thousand Baht), there must be a report to the upper level of superior. Receiving or giving a gift shall in no way affect the outcome of business decision of the recipient.

**4.6 Conflict of Interest.** The Company defines policy and guidelines on the prevention of conflict of interest, based on the principle that any decision making in business activities must be in the best interests of the Company and shareholders, and should refrain from doing any action that cause conflict of interest so that it shall be fair to all stakeholders. This is the Company's policy to prevent the exploitation of personal gain from being a director, executive or employee of the Company. In addition, the guidelines for directors, executives and employees of the Company have been defined as follows:

- (1) Refrain from doing a connected transaction or a transaction related with either self-interest or others' interest, that may lead to the conflict of interest of the Company, except for the transactions that are in order to support medical services and/or those that are reasonable and that are in the best interests of the Company.

- (2) not seeking benefits for oneself and others by using the information or inside information that has not yet been disclosed to the public or a secret to be used or disclosed to third parties.
- (3) not using documents or information obtained from being director, executive or employee of the Company in doing business of oneself or another, that is competing with or of the same or connected with the Company.
- (4) When a conflict of interest is found, there must be a report to the supervisor in the hierarchy as soon as possible.

**4.7 Employment of Government Employee.** The Company defines the policy of employment of Government Employee to hold office of director, management team, personnel, employee or advisor of the Company. There must be procedure of recruitment, hiring approval, framework of remuneration, and control process to ensure that the employment of government employee is not in return for obtaining any benefits subservient to the Company, breaking images on credibility and integrity in performing duties which increase risks of fraud and corruption.

**4.8 Procurement** The Company has a policy to treat business partners with fairness, integrity and not taking advantage of the partners, and taking into account the best interests of the Company, which is based on receiving fair returns for both parties. There are guidelines for liaison with the Company's business partners, in concerns with reputation, legality, regulations and significant custom, as well as the contractual performance with business partners in order to ensure fairness and benefits on equal basis. The details appear on the Company's website: [www.praram9.com](http://www.praram9.com) Investor Relations → Company Info → Corporate Governance → Business Ethics (Code of Conduct) → Corporate Governance Policy → CHAPTER III Consideration to the role of stakeholders. and business ethics.

#### **4.9 Risk Assessment**

- (1) The Company has designated Risk Management Committee composed of directors and senior management. The chairman of the Risk Management Committee is the Company's Director / Chief Executive Officer who is considered as the top executive of the Company to define a risk management policy for overall organization.
- (2) To realize the importance of systematic and efficient risk management and keep up with current situations. The Risk Management Committee shall directly report to the Audit Committee to define guidelines, measures, action plans, policies and risk management frameworks consistent with the Risk Management Policy.
- (3) To supervise, monitor and assess the Company's risk management results in accordance with the Company's strategic plans and business directions. This covers the policy and scope of risk management from external and internal factors.

#### **4.10 Audit and Internal Control**

- (1) The Company has established an audit and internal control system to combat corruption, covering both of financial aspects, accounting transactions and record keeping, including other processes in companies related to anti-corruption measures.
- (2) The audit and internal control system is a process to provide reasonable assurance that the operations are effective, reliable and adhere to the rules and anti-corruption policies. as specified by the Company.

**4.11 Accounting audits and record keeping.** The Company has a process of auditing accounting transactions and have appropriate approval before recording the transaction into the accounting system. They will be audited in line with the Company's policies, government regulations, relevant laws, contracts or agreements and in accordance with reasonable accounting standards and policies as follows

- (1) Operating expenses and investment expenses must have accurate and complete supporting evidence and must be approved in accordance with the limit approval hierarchy as specified in the policy on operating expenses or investment expenses, as the case may be.
- (2) Financial reports must be accurate, truthful and reliable. They must disclose material information accurately and completely, including related transaction information and potential liabilities.
- (3) The Company has sufficient and safe control over the storage of accounting documents for immediate use in audits. The access to accounting information is restricted. There are backup files kept safely. Details appear on the Company's website at [www.praram9.com](http://www.praram9.com) Investor Relations → Company Info → Corporate Governance → Business Ethics (Code of Conduct) → Policy on Accounting and Financial Statements.

**4.12 Personnel Management.** The Company will apply this policy as part of disciplines in personnel management, including the recruitment, training, performance assessment, compensation and promotion, etc.

**4.13 Training, communication and monitoring**

- (1) Directors, executives and employees will be regularly trained or informed about anti-corruption for awareness, especially the various forms of corruption, the risk of getting involved in corruption as well as reporting means in case of corruption found or suspicious.
- (2) All directors, executives and employees will be given a copy of this Policy or find this Policy from the Company's announcement in order to assure that everyone be aware of and understand the Company's Anti-corruption Policy. Moreover, the Policy and its latest updates are available in the Company's website.
- (3) To provide training on this Policy as a part of the orientation or before taking position of directors, executives and all new employees of the Company; to disseminate the measure and policy on anti-bribery to personnel within the organization with easily accessible anti-bribery measure.
- (4) To provide a test of knowledge and understanding about the measures to prevent Bribery of the organization to assess the effectiveness of training and to ensure that the measures shall be implemented and followed by employees at all levels properly.
- (5) The Company shall communicate the Anti-corruption Policy to agents, business intermediaries, distributor of products/services and contractors since the beginning of a business relationship and later as appropriate. The Company encourages agents, business intermediaries, distributor of goods/services and the contractors to adhere to the social responsibility standard as same as the Company.

## 5. Whistleblowing or complaining and protection of whistleblowers

The Company has a policy to protect and provide fairness to directors, executives and employees who report information or give clues to the fraud or non-compliance with law, rule, regulation or the Company's Code of Conduct (Whistleblower Policy) as follows:

### How to file a complaint or whistleblowing

(1) The complainant may submit a written complaint or the clues to the wrongdoing and fraud through various channels such as direct supervisor (manager up), the Company's intranet system or E-mail, comment box, submission of a letter to the Risk Management Manager of the Company.

(2) The supervisor, receiving complaints or clues to wrongdoing and fraud, must inform the Risk Management Manager of the Company promptly or within 3 working days to implement the process of factual investigation.

(3) The Risk Management Manager of the Company is responsible for maintaining a register containing all of the complaints or clues of wrongdoings and fraud; and making a summary report of all wrongdoing and fraud, whether it has been considered or is under factual investigation to the Audit Committee on regular basis at least once a quarter.

(4) In the event that the complainant exercises the option to remain anonymous, the details of facts or evidence must be clearly sufficient to reflect reasonable ground to believe that the fraud or non-compliance with law, rule, regulation or the Company's Code of Conduct was actually committed.

### Protection of the whistleblower

(1) Complainant may exercise an option to request confidentiality regarding his identity when considering that the disclosure may cause damage to himself provided that the details of facts or evidence must be clearly sufficient to reflect reasonable ground to believe that the fraud or non-compliance with law, rule, regulation or the Company's Code of Conduct was actually committed. However, the option to disclose identity shall help the recipient of the complaint to take the step more quickly.

(2) Information related to the complaint shall be treated by the Company in confidence and to be disclosed as to the extent necessary with regard to security and the damage of the reporter, data source, or the concerned person. In any case, the person responsible for every step must keep the known information at the highest level of confidentiality and not disclose to third parties. The failure to do so shall be a disciplinary offense.

(3) In the event that the complainant considers that it is tentatively in danger or troublesome, the complainant may ask for reasonable protection measures from the Company. The Company may impose protection measures without requirement from the Complainant, provided the situation is likely to cause damage or insecurity.

(4) An employee who treat another by any means unfair, unreasonably discriminate, or causing damage to anyone by the reason that such person making a complaint, giving an information or clues to fraud or non-compliance with law, rule, regulation or the Company's Code of Conduct, including the one who proceeds with legal action or acts as witness or gives testimony or provides any cooperation to the competent court or government agency, shall be charged with disciplinary offense to be punishable. However, they may be punished according to the law if it is an offense under the law.

(5) The injured persons shall be recovered the damage by the means or procedures justifiable and equitable as determined by the Risk Management Department.

A stakeholder who is a third party can inquire information, report complaints or clues to legal offenses, inaccuracy of financial statement, weak internal control system, unethical business practices, or violation of right through whistleblowing channel as follows.



- (1) Post Mail to  
 Audit Committee  
 Praram 9 Hospital Public Company Limited  
 99 Rama IX Road, Bangkok, Huai khwang, Bangkok, 10310
- (2) Hotline 1270
- (3) Company's website: [www.praram9.com/Investor Relations Section/Whistleblowing Channel](http://www.praram9.com/Investor%20Relations%20Section/Whistleblowing%20Channel)

In any case, the information, complaints and clues of various wrongdoings informed to the Company shall be kept confidential. The Audit Committee shall order to examine the information in order to find out the method of solution and further report to the Board of Directors.

## **6. Protection of Directors, Executives and Employees**

(1) The Company assures the directors, executives and employees that no one will be demoted, punished or affected in any way from refusing the Bribery although such refusal will cause the Company to suffer loss or miss an opportunity to get new business. The Company believes that a zero tolerance of Bribery and corruption policy shall create a long run of value for the Company. Moreover, the Company shall not allow anyone to threaten, intimidate or deter a director, executive and employee who intentionally comply with this policy.

(2) A director, executive and employee believing that he/she is being threatened or intimidated or deterred should immediately give a clue or lodge a complaint with the supervisor or the Human Resources Department. If there is no recovery given, it is available to report through the reporting channels under this policy.

## **7. Investigation and Punishment**

(1) In conducting an investigation and gathering facts, the recipient of the complaint shall forward the complaint to the following persons for conducting the examination and gathering facts (the "Auditor") on the matter complained.

- (1.1) In the event that the complainant is an employee holding position lower than the executive level, the Deputy Chief Executive Officer and/or the person or unit assigned by the Deputy Chief Executive Officer shall conduct as an Auditor.
- (1.2) In the case where the complainant is an employee holding position at the executive level upwards, the Audit Committee and/or any person or unit as assigned by the Audit Committee shall conduct as an Auditor.

In case of any doubts or questions, the Auditor may invite any employee or the direct supervisor of the complainant to provide information or any related documents for factual investigation.

(2) When the complaint is proved true, the following actions shall be carried out within 7 working days:

- (2.1) In case of the complaint regarding to fraud or non-compliance with law, rule, regulation or the Company's Code of Conduct, the Auditor shall consider submitting such complaint together with the Auditor's opinions to the Audit Committee for further determination.

- (2.2) The auditor shall notify the progress and results of the consideration of complaints of wrongdoing and fraud to the complainant disclosing his/her name, address, telephone number, email address or other contact channel. Nevertheless, from time to time, due to private information and confidentiality, the Company may not be able to disclose any details of the investigation or disciplinary action.
- (2.3) In the event that such complaint is significant, for example, it is potential to damage reputation, goodwill or financial status of the Company; or it is in conflict with the Company's business policies or concerned with the top management, etc., the Auditor shall consider proposing the matter together with the Auditor's opinion to the Board of Directors for further determination.
- (2.4) In the event that the complaint may cause damage to any person, the Auditor will propose appropriate and fair method to mitigate the damage to the injured person as it deems appropriate subject to the framework set forth by the Board of Directors. and/or the Audit Committee.
- (2.5) The auditor shall determine and find out the cause and the way to solve such wrongdoing and fraud as to prevent the recurrence in the future and further report to the Audit Committee for acknowledgement and carrying out the action in accordance with the established procedure.

#### **8. Review, Inspection and Improvement**

Review and improvement of Anti-Fraud and Anti-Corruption Policy including guidelines any manual relating to anti-corruption it is scheduled to be reviewed and updated regularly at least once a year or when there are significant changes. To ensure that any policies, guidelines and manuals relating to Anti-Fraud and Anti-Corruption are consistent with the company's policies including related laws and regulations. The review and improvement must be considered by the audit committee and approved by the Board of Directors, will be communicated to the general public.

This Anti-Fraud and Anti-Corruption Policy is effective from 10 August 2023.

-Signature-

(Satian Pooprasert, MD)  
Chief Executive Officer  
Praram 9 Hospital Public Company Limited