



Anti-Corruption Policy

Vibhavadi Medical Center Public Company Limited (“the Company”) is committed to conducting business with integrity and adhering to its responsibilities towards all relevant parties. The Company has joined the “Collective Action Coalition of Thai Private Sectors Against Corruption” to demonstrate its intention and commitment to combat corruption in all forms. The Company has a policy to define appropriate responsibilities, practices, and operating requirements to prevent corruption in all its business activities, ensuring that decisions and business operations with potential corruption risks are carefully considered and implemented. The Company has therefore established a written “Anti-Corruption Policy” as a clear guideline for conducting business and developing into a sustainable organization. The Company requires its subsidiaries, associated companies, other companies under its control (if any), business representatives, and persons involved in its business operations to strictly comply with the Anti-Corruption Policy.

Anti-Corruption Policy

1. The Company does not tolerate corruption in any form, covering all businesses and all related departments. All directors, executives, and employees must strictly comply with the anti-corruption policy.
2. The Company's directors, executives, and employees do not accept corruption for the benefit of themselves, their families, friends, or acquaintances in any form, whether directly or indirectly. They must strictly comply with anti-corruption measures.
3. The Company regularly reviews compliance with this Anti-Corruption Policy and updates its practices and operating requirements to ensure compliance with changes in business, regulatory, and legal requirements.
4. The Company has established procedures to ensure compliance with the Anti-Corruption Policy.
5. The Company will create and maintain an organizational culture that believes corruption is unacceptable in both government and private sector transactions.

1. Definition

Corruption refers to the performance or omission of duties, or the abuse of authority, in order to obtain undue benefits by offering, promising, giving, requesting, or accepting money, assets, or any other improper benefits to or from government officials, government agencies, private entities, or persons responsible for duties, either directly or indirectly, in order to induce such persons to act or refrain from acting in their duties, thereby securing business for the Company or obtaining or retaining any improper business advantage.

However, this excludes cases permitted by laws, regulations, announcements, rules, local customs, or accepted business practices.

Political Contributions refer to financial or non-financial support provided to politicians or political parties. Non-financial support includes the lending or donation of equipment, provision of technology services without charge, or providing venues for political activities such as accommodation, receptions, meetings, or gatherings, including advertising or promoting political parties or encouraging employees to participate in political activities on behalf of the Company in order to obtain business advantages.

Charitable Donations refer to the provision of money or items in any form without the expectation of business returns to organizations or individuals under the Company's Corporate Social Responsibility (CSR) framework.

Giving Sponsor refers to money, goods, or other benefits provided to or received from customers, business partners, associations, foundations, charitable organizations, or non-profit organizations with the purpose of promoting the Company's reputation, strengthening business relationships, and supporting appropriate occasions.

Giving and Receiving Gifts, Hospitality and Other Expenses refer to any items of value, whether monetary or non-monetary, including cash equivalents, exchangeable goods or services (such as airline tickets or discount coupons), transportation expenses, accommodation, and meals.

Facilitation Payment refer to small unofficial payments made to government officials to ensure or expedite routine governmental actions to which a person or entity is legally entitled.

Hiring of Government Employees refers to the hiring of individuals from the public sector to work in the private sector, which may create conflicts of interest and may affect the organization's neutrality, credibility, and integrity.

Conflict of Interest refers to any situation where personal interests conflict with the interests of the Company, whether directly or indirectly.

2. Responsibilities

2.1 **Board of Directors** shall be responsible for establishing policies and overseeing the implementation of an effective anti-corruption support system to ensure that the Company's business operations comply with applicable rules and regulations. The Board shall also ensure that the management recognizes the importance of anti-corruption practices and promotes them as part of the Company's organizational culture.

2.2 **Audit Committee** shall be responsible for reviewing various systems, including computer systems and internal control systems within the Company, to ensure that they are appropriate, up-to-date, and effective.

2.3 **Risk Management and Investment Committee** shall be responsible for establishing policies related to the organization's risk management and investment, including risks associated with corruption.

- 2.4 **Managing Director and Executives** shall be responsible for implementing the Anti-Corruption Policy by establishing appropriate systems, promoting and supporting the policy, and communicating it to employees and all relevant parties. They shall also regularly review the adequacy of the systems and measures to ensure alignment with changes in business operations, rules, regulations, and legal requirements.
- 2.5 **Internal Control Department** shall be responsible for auditing and reviewing operations to ensure compliance with policies, guidelines, delegated authorities, procedures, applicable laws, and regulatory requirements. This is to ensure that the Company conducts its business properly and maintains appropriate and sufficient internal control systems to address potential corruption risks. The department shall also review operational guidelines to ensure consistency with policies, procedures, regulations, announcements, laws, and changes in business operations, and report audit or review results to the Audit Committee.
- 2.6 **Employees** shall be responsible for adhering to and continuously implementing the Company's Anti-Corruption Policy and preventive framework throughout the organization.

3. Anti-Corruption Guidelines

3.1 Anti-Corruption Guidelines

- 3.1.1 The Board of Directors, executives, and employees of the Company shall not engage in any form of corruption, whether directly or indirectly.
- 3.1.2 The Board of Directors, executives, and employees shall not ignore or overlook any act that may constitute corruption related to the Company. Such matters must be reported to the designated responsible unit or person, or to their supervisor. They must also cooperate in any investigation of the relevant facts. If there are any questions or uncertainties, consultation should be made with the designated unit or person responsible for monitoring compliance with the Company's Code of Conduct, or with their supervisor, through the designated communication channels.
- 3.1.3 The Company shall ensure fairness and provide protection to any person who refuses to engage in corruption or reports corruption involving the Company. Protection measures for whistleblowers or those who cooperate in reporting corruption shall be implemented in accordance with the Company's **Whistleblower Policy**.
- 3.1.4 The Company shall disseminate knowledge and promote understanding among external parties who conduct business with the Company regarding compliance with the Anti-Corruption Policy.
- 3.1.5 The Company shall communicate anti-corruption measures, including channels for reporting misconduct or complaints, to internal personnel through various means, such as orientation programs for directors and employees, seminars and training sessions organized by the Company, and communication via the Company's intranet system. This is to ensure that the measures are implemented effectively and that personnel fully

understand, acknowledge, and comply with the Company's anti-corruption policies and measures.

- 3.1.6 The Company shall communicate its anti-corruption measures, including channels for reporting misconduct or complaints, to the public, subsidiaries, associated companies, other companies under the Company's control (if any), business agents, relevant business partners, and stakeholders through various channels such as the Company's website and annual report, in order to promote understanding and ensure proper implementation.
- 3.1.7 Employees shall acknowledge the Anti-Corruption Policy in writing to confirm that all employees are aware of, understand, and are prepared to strictly adhere to the principles of the Anti-Corruption Policy throughout the organization.
- 3.1.8 The Company shall establish financial disbursement procedures with clearly defined approval authority levels and approval limits. All disbursements must be supported by proper documentation to prevent inappropriate practices, including political contributions, and to ensure that charitable donations are not used as a means of corruption and that business sponsorships are not used as a pretext for corruption.
- 3.1.9 The Board of Directors, executives, and employees shall not give or accept gifts, hospitality, or other expenses that are unnecessary or inappropriate from government officials or business partners. If gifts exceeding customary value are offered on traditional or customary occasions, directors, executives, or employees must refuse such gifts and report the matter to their supervisors accordingly. Compliance with internal monitoring and auditing procedures must also be regularly observed.
- 3.1.10 The Company shall establish audit procedures and internal control systems to prevent corruption. These processes shall cover sales, marketing, procurement, human resource management, finance, accounting, record keeping, operational procedures, and other relevant processes related to anti-corruption measures. Regular monitoring shall be conducted through the internal control and internal audit systems.
- 3.1.11 The Company shall establish human resource management processes that reflect the Company's commitment to anti-corruption measures, including recruitment, training, performance evaluation, compensation, and promotion.
- 3.1.12 The Company shall implement risk management measures to prevent corruption by identifying high-risk events that may arise from business operations, assessing both the likelihood and impact of such risks, and regularly monitoring the progress of corruption risk management. Risk mitigation measures shall also be reviewed periodically to ensure that risks remain within acceptable levels.
- 3.1.13 The Company shall establish internal audit procedures to ensure that the risk management system effectively supports the achievement of the Company's objectives and that internal operations comply with applicable requirements and regulations.
- 3.1.14 These operational measures shall be documented in accordance with internal control principles to ensure alignment with the Company's policies and regulations.

3.1.15 The Internal Audit Office shall include anti-corruption measures as a regular agenda item so that the Chairman of the Audit Committee can report the annual audit results relating to anti-corruption measures to the Board of Directors.

- To ensure clarity in managing matters that present a high risk of corruption, the Board of Directors, executives, and employees must exercise particular caution in the following areas:

- Political Contribution
- Charitable Donations and Sponsor
- Giving and Receiving Gifts, Entertainment and Hospitality
- Facilitation Payment
- Hiring of Government Employees
- Conflict of Interest

3.2 Political Contributions Guidelines

3.2.1 The Company conducts its business with political neutrality and shall not provide support to, or show political preference toward, any politician or political party.

3.2.2 The Company shall not provide financial support or in-kind contributions to any political party, politician, or political candidate as political contributions, as defined under the definition of political support, for the purpose of obtaining business advantages for the Company.

3.2.3 Employees have the right and freedom to participate in political activities under the provisions of the Constitution. However, they must not claim to represent the Company or use any Company assets, equipment, or resources for political purposes. If they participate in political activities, they must exercise caution to ensure that their actions do not create the impression that the Company lacks political neutrality.

3.2.4 The Company shall inform its executives and employees that the Company will not participate in or provide support for political activities.

3.3 Charitable Donations and Sponsor Guidelines

3.3.1 Charitable donations, whether in the form of financial assistance or other forms such as providing knowledge or volunteering time, may be made by the Company as part of its **Corporate Social Responsibility (CSR)** activities without expecting any business return. Such donations must strictly comply with the Company's guidelines on charitable donations and sponsorships.

3.3.2 Sponsorships for business promotion and enhancing the Company's corporate image may be made for business or reputational purposes. However, such sponsorships may involve risks as they involve payments for services or benefits that may be difficult to measure or monitor. Therefore, they must strictly comply with the Company's guidelines on charitable donations and sponsorships.

- 3.3.3 Charitable donations and sponsorships may expose the Company to corruption risks, as these activities involve financial expenditures without tangible returns and may potentially be used as a channel for corruption. To prevent charitable donations from having hidden purposes, they must be carried out with due diligence to ensure transparency and compliance with applicable laws as well as the Company's regulations.
- 3.3.4 Directors, executives, or employees who wish the Company to participate in charitable donations or sponsorships ("the requesting person") must prepare a request form for approval of charitable donations or sponsorships, specifying the name of the recipient organization and/or beneficiary, the purpose of the donation or sponsorship, and attaching supporting documents for submission to the authorized approver of the Company.
- 3.3.5 The requesting person shall be responsible for conducting due diligence on the charitable organizations, foundations, companies, or business entities to which the Company intends to donate or provide sponsorship before submitting the request for approval. The following requirements must be ensured:
- The charitable donation or sponsorship must not be used as a means to facilitate bribery and must be conducted transparently and in compliance with applicable laws.
 - It must be verifiable that the charitable project or activity genuinely exists and is implemented to achieve the objectives of the project and provide real benefits to society, or in accordance with the objectives of **Corporate Social Responsibility (CSR)**.
 - It must be verifiable that the activity is genuinely charitable in nature and is not associated with any reciprocal benefits for any individual or organization, except for customary recognition or acknowledgement.
- 3.3.6 If the Company discovers or receives official information that any organization, foundation, company, or business entity to which the Company has made donations or sponsorships is involved in corruption, the Company shall immediately suspend such donations or sponsorships upon becoming aware of the matter.
- 3.3.7 Monitoring and review to ensure that charitable donations or sponsorships are not used for corruption purposes shall form part of the Company's internal control and internal audit processes.

3.4 **Giving and Receiving Gifts, Hospitality and Other Expenses**

Improper practices relating to gifts, hospitality, and other expenses may create risks of corruption and provide channels for fraudulent activities. Such practices may involve payments made to directors,

executives, or employees of the Company as a means of bribery. In addition, providing gifts, hospitality, or other inappropriate expenses to customers may violate the policies of certain customers and may result in the Company losing business opportunities. The Company recognizes the importance of building good relationships with its business partners, which contribute to the Company's continued success. At the same time, the Company is committed to maintaining its reputation as an organization that conducts its business with integrity and in compliance with applicable laws. Accordingly, the Company has established the following guidelines regarding the giving and receiving of gifts, hospitality, and other expenses:

- 3.4.1 Directors, executives, and employees of the Company may give or receive gifts, hospitality, or other expenses, such as hosting or accepting hospitality from others, on various occasions in accordance with customary traditions, cultural practices, or generally accepted social etiquette. Such giving or receiving must be conducted transparently and openly. It must not create any improper advantage through inappropriate actions, whether explicitly or implicitly, in exchange for assistance or benefits that could result in undue concessions in business agreements or influence business decisions. All such actions must comply with applicable laws. Gifts given on behalf of the Company must be presented in the name of the Company, not in a personal capacity, and may include items bearing the Company's logo. Gifts must not be in the form of cash or cash equivalents, such as cheques, gift cards, or vouchers (except in the case of promotional activities where clear criteria are established and applied equally to all recipients).
- 3.4.2 Directors, executives, and employees must not solicit or accept gifts, hospitality, or other expenses from customers, business partners, or parties related to the Company's business in any circumstance that could influence their decisions in performing their duties with bias, create discomfort, or result in a conflict of interest.
- 3.4.3 Directors, executives, and employees must not accept any gifts or compensation that are excessive in relation to the performance of their normal duties. For example, during a bidding or procurement process, they must not accept gifts or hospitality from participating bidders or related companies.
However, directors, executives, and employees may accept gifts and/or hospitality and/or other expenses if they are given during festive occasions or in accordance with normal customs, provided that the value does not exceed THB 3,000 (Three Thousand Baht). Such gifts must not be in the form of cash or cash equivalents, such as vouchers or gift cards.
- 3.4.4 Gifts, hospitality, or other benefits with a value exceeding **THB 3,000 (Three Thousand Baht)**, or gifts in the form of cash or cash equivalents (such as gift cards or vouchers), are strictly prohibited. In situations where it is not possible to refuse such gifts or benefits at the time they are offered—for example, during meetings or discussions with customers—the recipient may temporarily accept the gift or benefit but must immediately report the matter to their supervisor and complete a gift acceptance report form for submission to the

Office Administration Department. The Company may subsequently consider donating such items or gifts to charitable organizations for the public benefit, as appropriate.

3.4.5 The giving and receiving of other benefits, such as entertainment or hospitality events, must be reasonable and not involve excessive expenditures or occur so frequently that they create obligations toward the hosting party, whether directly or indirectly.

3.4.6 The Company shall communicate and provide guidance to directors, executives, and employees regarding the Company's policies and practices on gifts, hospitality, and other expenses through annual meetings and other communication channels available within the Company.

3.4.7 The Company shall also communicate or inform customers, business partners, and other relevant parties involved in the Company's business of the Company's policies and guidelines on gifts, hospitality, and other expenses through corporate brochures or other materials used to introduce and promote the Company's business activities.

3.5 Facilitation Payment Guidelines

The Company strictly prohibits the payment of facilitation payments to government officials in any circumstances, whether directly or indirectly. Such payments carry a high risk of constituting bribery, increasing business costs, damaging the Company's reputation, and violating the Company's Anti-Corruption Policy.

3.6 Hiring of Government Employees Guidelines

The Company has established a policy regarding the hiring of government employees to serve as directors, executives, employees, staff, or consultants of the Company. Such hiring must undergo proper recruitment procedures, approval processes, determination of remuneration, and control mechanisms to ensure that the employment of government employees is not used as a means of providing benefits in exchange for advantages to the Company. This is to prevent potential corruption risks and to maintain the Company's credibility, reputation, and integrity in the performance of its duties.

3.7 Conflict of Interest Guidelines

The Company places great importance on mechanisms for overseeing transactions that may involve **conflicts of interest** or **related party transactions**, ensuring that such matters are considered carefully, prudently, and with integrity. The consideration and approval of such transactions must comply with applicable laws and the requirements of relevant regulatory authorities. Any person who has an interest in a particular transaction shall not be involved in the consideration or approval process of that transaction. In addition, the Company has established a policy governing transactions with persons who may have conflicts of interest for executives and employees to ensure that such transactions are conducted fairly and transparently, and in compliance with the rules and regulations of applicable laws and relevant regulatory authorities. The Company also ensures that accurate and complete disclosure of such transactions is made in accordance with the principles of good corporate governance.

3.8 Procurement

The Company realize the significance of partners as allies who contribute to creating value and maintaining a positive image of the Company. The Company is committed to conducting business with partners transparently, fairly, and clearly, ensuring fairness for all parties involved. The Company prioritizes the procurement of quality medicines and medical equipment, adheres to safety standards, cares for the environment, and implements appropriate assessment criteria for partners.

3.9 Risk Assessment Guidelines

3.9.1 Risk assessment enables the Company to identify activities that may be exposed to corruption risks, the potential impacts that may arise, the required mitigation measures, methods for measuring success, and the resources needed to reduce such risks.

3.9.2 The Internal Audit Office shall regularly assess potential corruption risks (at least once a year), including reviewing the existing risk management measures to ensure that they remain appropriate and effective in keeping such risks at an acceptable level.

3.10 Internal Audit Control Guidelines

3.10.1 The Company has established an internal control system to ensure that its operations are conducted appropriately and efficiently, and in compliance with applicable laws and regulations. In order to reduce the risk of corruption, the Company has also implemented an internal audit system to provide reasonable assurance that the existing internal control system can effectively support the Company in achieving its objectives.

3.10.2 The Company requires the Internal Audit Office to prepare an audit plan at least once a year. The audit plan must be approved by the Audit Committee and will take into consideration risks that may lead to corruption.

3.10.3 The Company shall maintain an effective internal control system to prevent corruption, which includes checks and balances as well as cross-verification in areas such as accounting, record keeping, and other related business processes.

3.10.4 The Company has established procedures for reporting audit results and urgent issues as follows:

- The Internal Audit Office shall report audit results and key findings at least once a year to the Audit Committee, with a parallel report submitted to the Managing Director.
- After reporting the audit results, the Internal Audit Office shall discuss the internal control findings with the Hospital Director and the relevant department directors in order to determine appropriate internal control measures.
- If any urgent issues are identified, the Internal Control and Internal Audit Department shall immediately report the matter directly to the Chairman of the Audit Committee.

- The Audit Committee shall subsequently report the audit results to the Board of Directors.

3.11 Human Resource Management

This anti-corruption policy covers the entire human resource management process, including recruitment or selection of personnel, promotion, training, employee performance evaluation, and compensation. It requires supervisors at all levels to communicate and ensure that employees under their responsibility understand and effectively implement the policy as follows :

3.11.1 Employment The Company has established criteria regarding the categories and qualifications of employees for recruitment. Applicants who meet the qualifications set by the Company must not have any history of misconduct, neglect of duty, or abuse of authority for personal gain through any form of corruption. The Company has also established procedures for the consideration and recruitment of employees as follow

- Applicants must submit their applications along with the necessary documents required by the Company to the Human Resources Department.
- The Human Resources Department considers the preliminary qualifications and, together with the executives of the departments seeking to hire, tests the candidates' knowledge and abilities as appropriate.
- Once the Company has entered into an employment contract with any individual to perform duties in a specific position, such individual shall be deemed an employee of the Company and shall receive remuneration as specified in the employment contract or employee register. The determination of compensation shall be based on the individual's knowledge, skills, experience, and the prevailing conditions of the labor market

3.11.2 Performance evaluation The Company conducts performance evaluations in two phases as follows:

- Probationary Performance Evaluation: Newly hired employees are required to undergo a probationary period not exceeding 120 days from the date of commencement of employment.
- Annual Performance Evaluation (twice a year): This evaluation aims to ensure mutual understanding of work objectives and to improve employees' performance over the past year. It also includes an assessment of employees' work behavior, particularly behaviors that may indicate misconduct, neglect of duty, or abuse of authority for personal gain through any form of corruption.

3.11.3 The Board of Directors has the duty to review the suitability and adequacy of personnel to carry out operations to combat corruption.

3.12 Training, Communication and Monitoring

3.12.1 The Board of Directors

The Company will present information about the anti-corruption policy to all directors.

3.12.2 Employees

- All new employees will receive a copy of the anti-corruption policy and will be trained on the policy during their orientation.
- All employees will receive a copy of the Anti-Corruption Policy to ensure they are informed and understand the Company's stance on combating corruption. Additionally, the updates policy can be accessed on the Company's website and intranet system. The Company will notify employees of any significant changes.
- All employees will receive regular anti-corruption training to raise awareness about corruption, such as its various forms, the risks of involvement in corruption, and the methods for reporting any witnessed or suspected corruption.

3.12.3 Agents, business intermediaries, distributors/service providers and contractors

The Company shall communicate its anti-corruption policy to its agents, business intermediaries, distributors/service providers, and contractors from the outset of the business relationship and thereafter as appropriate. The Company supports its agents, business intermediaries, distributors/service providers, and contractors in adhering to anti-corruption principles.

4. Whistleblowing and Complaint-making

The Board of Directors provides measures for reporting evidence or filing complaints regarding illegal activities, as well as ethical activities or actions that may indicate corruption or misconduct, of individuals within the organization, including employees and other stakeholders, to file complaints regarding incorrect financial reporting or reports of defective internal control management. In this regard, the Company has established an appropriate mechanism to protect whistleblowers or complainants, enabling stakeholders to take an active role in monitoring the Company's interests more efficiently.

Whistleblowing and Complaint matters

- Illegal deeds, corrupt practices, violations of the Company's regulations of code of conduct by directors and employees.
- Financial reporting irregularities and deficiencies in internal control systems.
- Matters affecting the benefits or reputation of the Company

Whistleblowing and Complaint Channels

The Board of Directors provides opportunities for stakeholders to communicate with them and will protect the rights of stakeholders who report tips or complaints about various issues. The communication channels are through the Company's Audit Committee, which will follow the processes determined by the Company and report to the Board of Directors. The contact channels are as follows:

1. By post, by sending the matter to the attention of the;
Audit Committee
Vibhavadi Medical Center Public Company Limited
51/3 Ngamwongwan road, Latyao, Jatujak Bangkok 10900
2. By e-mail ; vibha_cac@vibhavadi.com
3. QR Code for Whistleblowing or Complaints (which will be sent directly to the Audit Committee) will be posted in various locations throughout the hospital.

Mechanism for protecting whistleblowers.

To create confidence for those who report evidence or file complaints, the Company places great importance on keeping confidential information regarding whistleblowing or complaints and has established written procedures for receiving and conducting investigations into such matters. Complaints will be known only to an assigned group of individuals. If, in the event, such confidential information is disclosed without the proper authorization, the Company will conduct an investigation to determine the individual who disclosed such information and impose disciplinary actions accordingly.

Additionally, it is considered the duty of the supervisor or departmental head of the person who provided the information, or the complainant, to apply the necessary discretion to protect the whistleblowers, complainants, witnesses, and persons providing information for the investigation, from encountering any harm or torment, or unfairness, resulting from their whistleblowing, filing complaints, bearing witness, or providing the necessary information.

This must be in accordance with the policy to protect and provide fairness to all employees who report evidence or file complaints regarding dishonest activities, or actions that do not comply with the Company's rules, regulations, code of conduct, or the relevant laws.

5. Consideration of Penalties for Violation or Non-Compliance with the Anti-Corruption Policy

- 5.1 If any director violates or fails to comply with this policy, the Company shall establish an investigation committee to promptly investigate the facts relating to such actions. The investigation committee shall consist entirely of the Company's independent directors. In cases where the director who violates or fails to comply with this policy is an independent director, that independent director shall not participate in the investigation committee for that particular case. If it is proven that a director has violated or failed to comply with the policy, the investigation committee shall consider appropriate penalties based on factual evidence and surrounding circumstances on a case-by-case basis. The investigation results, including the recommended penalties, shall be reported to the Board of Directors (excluding the director who violated or failed to comply with the Anti-Corruption Policy) for further consideration. If such violation or non-compliance also constitutes a legal offense, the director shall be subject to penalties as prescribed by law.
- 5.2 If executives or employees violate or fail to comply with this policy, they shall be subject to disciplinary action. The method of disciplinary action shall depend on the facts and surrounding circumstances and may include termination of employment in accordance with the Company's work

regulations. If such violation or non-compliance also constitutes a legal offense, the individual shall be subject to penalties as prescribed by law.

- 5.3 The Company has a policy not to demote, penalize, or impose any negative consequences on employees who refuse to engage in corruption, even if such refusal results in the loss of business opportunities for the Company.
- 5.4 The Company utilizes all internal communication systems to publicize the penalties for non-compliance with anti-corruption measures, including clearly communicating the policy of no negative consequences for employees who refuse to engage in corruption, even if such refusal results in the loss of business opportunities.
- 5.5 The Company promotes awareness among employees regarding compliance with the Anti-Corruption Policy by recognizing and encouraging employees who demonstrate adherence to the policy, such as through public commendations or awards.

6. Monitoring and reviewing

The Company has designated the Audit Committee to monitor and assess corruption risks, including reviewing anti-corruption measures and related internal controls at least once a year, and to regularly report the results to the Board of Directors.

- Nikom Wairatpanij -

(Mr. Nikom Wairatpanij)

Chairman of the Board of Directors

Vibhavadi Hospital Public Company Limited