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**Bangkok Chain Hospital Public Company Limited**

## **Anti-Corruption Handbook**

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## Anti-Corruption Handbook

### Bangkok Chain Hospital Public Company Limited

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#### 1. Introduction

Bangkok Chain Hospital Public Company Limited (“the Company”) is committed to conducting its business with honesty, integrity, and transparency, adhering to its responsibilities to society and all stakeholders in accordance with the principles of good corporate governance. The Company recognizes the importance of ethical conduct and is firmly committed to preventing and combating all forms of corruption. In line with this commitment, the Company was certified under the Thai Private Sector Collective Action Against Corruption (CAC) on 10 November 2017.

To comply with the relevant principles and implementation procedures, the Company has established an anti-corruption policy and developed an anti-corruption handbook as an extension of its Anti-Corruption Policy and Business Ethics and Corporate Governance Handbook. This serves as a practical guideline for conducting business operations and driving the organization toward sustainable development.

#### 2. Objectives

- To define the responsibilities of relevant personnel in the organization in alignment with the established anti-corruption policy.
- To establish guidelines and regulations for all executives and employees to adhere to in combating corruption.
- To set out criteria for auditing and oversight.

#### 3. Definitions

“**The Company**” refers to Bangkok Chain Hospital Public Company Limited.

“**Subsidiaries**” refers to companies in which Bangkok Chain Hospital Public Company Limited holds, directly and/or indirectly, more than 50 percent of the shares.

“**Corruption**” refers to the act of soliciting, accepting, agreeing to accept, giving, offering, or promising to give any asset or other benefit to a government official, public agency, officer of a private organization, or private entity to induce such person or entity to exercise their authority improperly by acting, refraining from acting, expediting, or delaying any action in a manner that violates their official duties for the benefit of the Company, unless such action is permitted by applicable laws, traditions, or customary practices.

#### **4. Scope of enforcement**

This Anti-Corruption Handbook covers key operational processes, including sales and marketing, procurement, finance and accounting, contract and licensing procedures, as well as human resources management, encompassing recruitment and selection, promotion, training, performance evaluation, and employee compensation. All supervisors are required to communicate and ensure employees understand the content of this Handbook, applying it to business activities under their responsibility and supervising its effective implementation.

#### **5. Duties and Responsibilities of Related Personnel**

This Anti-Corruption Handbook outlines the roles and operational procedures of various departments involved in business activities that present a risk of corruption, whether in dealings with the public or private sector. To emphasize transactions that align with the risk definitions specified in the Company's Anti-Corruption Policy. The departments involved are as follows:

- Procurement Department
- Sales and Marketing Department
- Finance and Accounting Department
- Human Resources Department
- Engineering Department

#### **6. Procedural Guidelines for Business Transactions**

The Company requires all departments to document their operational procedures in writing, which must be reviewed and approved by the respective department heads to become effective. These procedures should consider the segregation of duties among personnel according to the steps and processes to ensure transparency, independence, and the ability to prevent or detect corruption risks. Additionally, related documents must be properly stored in accessible channels and communicated to the relevant personnel.

Business activities with risks of corruption involving both the public and private sectors are as follows:

##### **6.1 Customer/Patient Service**

The Company is committed to providing customers/patients with quality, standardized, and safe services. Therefore, it has adopted the HA (Hospital Accreditation) standard, which is a benchmark for hospital development and evaluation by the Institute of Hospital Quality Improvement and Accreditation (Public Organization), supported by the Ministry of Public Health, covering the hospital's health promotion roles. Additionally, the Company adheres to JCI (Joint Commission International), an international hospital accreditation standard. Furthermore, the Company operates its service policies based on its core values, with a strict policy of not soliciting, accepting, offering, or giving any financial or other benefits to any individual or entity to obtain unlawful or unethical advantages, practices, or exemptions.

## **6.2 Competition and Investment**

The Company maintains a trading policy based on its core values, adhering strictly to fair competition rules and conducting business in accordance with good corporate governance principles. Any increase, decrease, or new business investment must undergo an approval process in line with the Company's authorized procedures. The Company conducts its trade and investment activities ethically, respecting customers, business partners, competitors, shareholders, and society. The Company strictly prohibits soliciting, accepting, offering, or giving any financial or other benefits to any individual or entity to obtain business contracts, benefits, or to induce actions or omissions that are unlawful or unethical.

## **6.3 Loans, Advances, and Commitment Incurrence**

The Company establishes policies and procedures for loans, advances, and the incurrence of commitments between the Company and other parties in accordance with the Company's authorized powers and the criteria outlined in the Securities and Exchange Act B.E. 2535 (1992). Additionally, interest rates and financial benefits must be reasonable and fair, reflecting market conditions. The Company strictly prohibits soliciting, accepting, offering, or providing any financial or other benefits to any individual or organization in order to obtain loan agreements, advances, or commitments that violate applicable laws or ethical standards.

## **6.4 Procurement and Contracting**

The procurement of medical instruments, equipment, office supplies, and other contracted services must specify the purpose of each purchase or contract. For high-value procurements, the Company will establish a Procurement Committee to review and compare prices from various vendors or service providers following the Company's procurement procedures. This process is conducted with transparency and fairness to all parties involved. For routine procurements, approvals will be granted in accordance with the Company's delegated authority. The Company strictly prohibits soliciting, accepting, offering, or providing any financial or other benefits to any individual or entity to obtain undue advantages, preferential treatment, or exemptions that are unlawful or unethical.

## **6.5 Accounting and Financial Operations**

The Company has set procedures for receiving and disbursing funds from entities and individuals as follows:

### **6.5.1 Receipt of Funds**

- The Finance Department must always verify the purpose of funds received. If the funds are not from the hospital's normal business operations, approval must be obtained from a supervisor following established procedures.
- A receipt must be issued for every payment received, with proper documentation for accounting purposes.

- Any funds received that are unlawful or inconsistent with their intended purpose must be refused, and management notified for corrective action. Legal counsel should be consulted if necessary.
- Payers are requested to make payments by crossed cheque marked “A/C PAYEE” or bank transfer. For cash received in normal hospital business, a process coordinated with the bank ensures all cash is properly deposited.
- The Company funds must never be deposited into employee or unauthorized accounts, and payers must be prohibited from such actions.
- The Company strictly prohibits soliciting, accepting, offering, or giving any financial or other benefits to delay receipt of funds or cause loss through late, partial, or non-payment.

### **6.5.2 Disbursement**

- Prior to any disbursement, a clear analysis must be conducted to determine the purpose of the payment. All disbursements must be recorded by the Accounting Department and must comply with applicable accounting principles and relevant laws.
- Any irregular or inappropriate transactions are identified, must be reported to supervisors, and corrective and preventive actions must be taken in accordance with accounting standards and legal requirements.
- All disbursements must be authorized following the Company’s Delegation of Authority Manual, and each payment must be supported by valid documentation as required by the Revenue Code.
- Creditors or payees must be treated equally and fairly, with payments made in accordance with appropriate business terms, without bias or discrimination.
- The Company strictly prohibits any solicitation, acceptance, or offering of financial or other benefits to or from creditors or payees that may result in damage to the Company, including delayed payments, partial payments, or improper settlements.

### **6.6 Human Resources Operations**

The Company has established standard procedures for human resources operations covering recruitment, background checks, employment, orientation, training and development, performance evaluation, disciplinary investigation, and employee sanctions. These procedures are clearly defined in the Human Resources Operating Manual and the Employee Handbook. The Company strictly prohibits requesting or accepting any form of benefit or compensation from applicants or individuals involved in the recruitment process, both during hiring and probationary evaluation, in order to ensure fairness and integrity in employment practices.

### **6.7 Engineering Operations**

The Company is in the process of expanding its business, including the opening of new hospital facilities and the renovation of existing hospital buildings. Such transactions may involve obtaining various permits, such as construction permits, building certification, and preparation of environmental impact assessment reports. The Company has established clear operational procedures and guidelines, including a strict policy prohibiting any solicitation, acceptance, offer, or provision of financial or other benefits in any form to government agencies or private contractors to secure any improper advantages, favors, or exemptions that violate laws or ethical standards.

### **6.8 Medical Licensing Operations**

The Company operates private hospitals and annually applies for and/or renews various licenses, such as medical service agreements and hospital licenses. The Company has clearly defined operational procedures and guidelines, including a strict policy prohibiting the solicitation, acceptance, offering, or provision of any financial or other benefits to government agencies to obtain business contracts, privileges, or to secure or waive any actions that are unlawful or unethical.

## **7. Communication and Disclosure**

### **7.1 Directors, Executives, and Employees**

- The Company and its subsidiaries shall provide orientation training for new employees and ongoing training for directors, executives, and employees to ensure a comprehensive understanding of anti-corruption measures, the Company's expectations, and penalties for violations.
- Directors, executives, and employees will receive a copy of this policy in brochure form, and the full policy is accessible on the Company's website ([www.bangkokchainhospital.com](http://www.bangkokchainhospital.com)). The Company will also communicate through annual activities to ensure all personnel are aware of and understand the Anti-Corruption policy.

### **7.2 Agents, Business Intermediaries, Suppliers, Service Providers, and Contractors**

- The Company and its subsidiaries shall communicate anti-corruption policy to agents, business intermediaries, suppliers, service providers, and contractors from the outset of business relationships and subsequently as appropriate. Communication channels may include notice boards, brochures, the Annual Report, the Company website, or other suitable methods. This policy complies with Thai anti-corruption laws.

## **8. Internal Audit and Data Retention**

- The Company has implemented a comprehensive internal control system to manage corruption risks across all key business areas, including sales and services, trading and investment, loans and advances, commitment incurrence, procurement, accounting and finance, human resources, engineering, medical licensing, and internal data management.

- Each department must document its operating procedures in writing for review and approval by management, ensuring segregation of duties, checks and balances, transparency, independence, and the ability to prevent or detect corruption risks through established workflows.
- The Internal Audit Department is assigned to assess the adequacy, appropriateness, efficiency, and effectiveness of the Company's internal controls, providing recommendations and corrective measures to enhance control systems to effectively prevent and detect potential corruption risks.
- Annually, from June to November, the Corporate Office organizes operational audits involving management representatives from various departments such as accounting and finance, human resources, medical and nursing, pharmacy, IT, quality, medical coordination, treasury, procurement, engineering, marketing, and service to conduct comprehensive audits including corruption risk management.
- Document retention and business process records related to this policy are overseen by the Internal Audit Department, which ensures compliance with the data retention policy. Physical and electronic records are retained for a minimum of 5 years or until the expiration of the statutory limitation period to ensure sufficient evidence is available for legal proceedings if necessary.

#### **9. Monitoring and Evaluation**

- The Company shall conduct regular reviews of the Anti-Corruption Handbook at least once annually, submitting findings to the Audit Committee to assess the adequacy and effectiveness of anti-corruption measures. Results, including risk assessments and recommendations, will be reported to the Board of Directors.
- Internal controls and related regulations will be periodically audited by the Internal Audit Department, with urgent findings reported promptly to ensure the effectiveness of anti-corruption controls.
- Department heads are responsible for conducting regular reviews of operational procedures and processes at least every two years, or whenever significant changes occur, to ensure ongoing alignment with sound internal control principles.

#### **10. Reference Documents and Responsibilities**

The principles or procedures outlined in this Anti-Corruption Handbook may refer to existing company documents. In such cases, the operational steps and responsibilities shall follow the referenced documents to ensure consistent standards. Should any company personnel have questions regarding the implementation of this handbook, they may seek guidance from the Internal Audit Department.

## **11. Review and Improvement**

This Anti-Corruption Handbook is overseen by the Audit Committee and shall be reviewed and updated regularly at least once a year or whenever significant changes affecting corruption risk management occur. This is to ensure that the handbook remains aligned with the Company's Anti-Corruption Policy, Business Ethics, and practices, as well as compliance with relevant regulations and laws. Furthermore, any updates to this handbook must be approved by the Board of Directors and communicated widely to all relevant parties.

This Anti-Corruption Handbook shall come into effect as of January 14, 2026, pursuant to the resolution of the Board of Directors' meeting No. 1/2026 held on January 14, 2026.

## Appendix

The Company or any of its departments intends to make charitable donations, provide sponsorship, or receive or give gifts, hospitality, or other expenses, the following control procedures must be strictly followed:

1. The requesting officer must assess the purpose of the request to ensure compliance with business ethics and the anti-corruption policy. The proposal should be reviewed by a minimum of the department head and subsequently submitted to the authorized approver as outlined in the Delegation of Authority Manual for final review and approval.
2. Approval by the authorized person, the accounting department shall prepare the payment voucher or asset transfer document and record the transaction in the system.
3. For monetary donations, the finance department shall issue a cheque for authorized signature and monitor the receipt of related evidence. In the case of asset donations, the asset accounting department is responsible for the delivery and tracking of receipt documentation.
4. All related documents shall be maintained by the accounting department in an organized filing system accessible for audit and review.

**Approval Matrix for Donations, Sponsorships, and the Acceptance or Offering of Gifts, Hospitality, and Other Expenses as per the Delegation of Authority Manual**

No.	Description	Authorizers							Remarks
		กค	CEO / รอง	รอง กคค	ผฝ ก	ผอ รพ	ผฝ	ทพ	
1	Reimbursement of entertainment or gift expenses								Only for hospitality third parties and specify in the receiver of the hospitality / in case of giving a gift, it must be worth not more than 2,000 baht/piece/person.
	Third Party <b>per time</b>								
	- Not exceeding 1,000 Baht						A	P	
	- Not exceeding 5,000 Baht					A	R	P	
	- exceeding 5,000 Baht		A		R	R	R	P	
2	Reimbursement of Charitable Donations								
	<b>per time</b>								
	- Not exceeding 100,000 Baht			A	R	R	R	P	
	- exceeding 100,000 Baht		A		R	R	R	P	
3	Reimbursement of Sponsorship <b>per time</b>								There must be a clear objective and verifiable evidence.
	- Not exceeding 100,000 Baht			A	R	R	R	P	
	- exceeding 100,000 Baht		A		R	R	R	P	

<b>Notes:</b>	กน	means	Board of Directors or the person assigned by the director
	CEO	means	Chief Executive Officer
	รอง CEO	means	Deputy Chief Executive Director
	รอง กน	means	Executive Vice President
	ผก	means	Department Director (Head Office)
	ผอ รพ	means	Hospital Director
	ผ	means	Department Director/Branch Manager
	ผ	means	Department Manager/Head of Department Branch
	R	means	Review
	A	means	Approve
	P	means	Prepare

Appendix (cont.)

Flowchart of Procedures and Controls for Donations of Money or Assets for Charity, Sponsorships, and the Receiving or Giving of Gifts, Hospitality Expenses, and Other Related Costs

