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Bangkok Chain Hospital Public Company Limited

Anti-Corruption Risk Management Handbook

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Anti-Corruption Risk Management Handbook

Bangkok Chain Hospital Public Company Limited

1. Introduction

Bangkok Chain Hospital Public Company Limited (the “Company”) mandates a regular and continuous assessment of corruption-related risks (at least once per year) across all departments of the Company and its subsidiaries. This practice has been implemented since 2017. Each department is responsible for identifying corruption-related risks, evaluating the likelihood and potential impact, and formulating appropriate mitigation strategies, including specific preventive and anti-corruption measures. The assessment process takes into account business activities, operational processes, industry characteristics, and business conditions to ensure alignment with the Company’s Anti-Corruption Policy and Anti-Corruption Handbook, which provides clear operational guidelines. These include policies regarding political contributions, charitable donations, the giving or receiving of sponsorships, gifts, entertainment, and other related expenses. All directors, executives, and employees of the Company and its subsidiaries are required to strictly adhere to these policies as communicated and delivered through training programs.

To ensure compliance with relevant procedures and standards, the Company has established this Anti-Corruption Risk Management Handbook as a supplement to the Anti-Corruption Policy and Anti-Corruption Handbook. It serves as a practical guide for preventing and mitigating potential corruption-related risks in the future.

2. Objectives

- To define the roles and responsibilities of relevant parties in the anti-corruption risk management process.
- To establish measures for identifying and assessing potential corruption-related risks.
- To set out guidelines for the reduction and prevention of corruption-related risks.
- To provide measures for monitoring and reviewing anti-corruption risk management activities.

3. Definitions

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

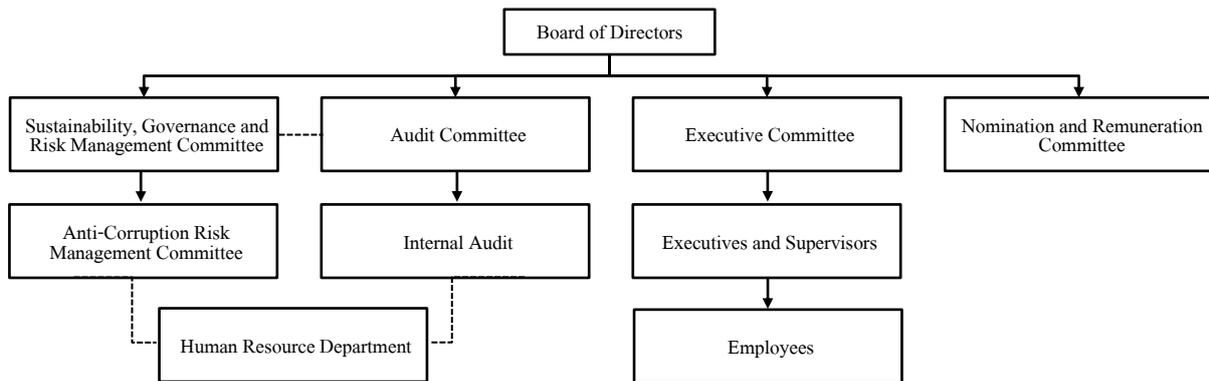
“**Subsidiaries**” refers to companies in which Bangkok Chain Hospital Public Company Limited holds, directly and/or indirectly, more than 50 percent of the shares.

“**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 Risk Management Handbook applies to the directors, executives, and employees of the Company and its subsidiaries, as well as to agents, business intermediaries, product/service distributors, contractors, and consultants who are involved with or act on behalf of the Company and/or its subsidiaries. This Handbook forms an integral part of the Company's Business Ethics, Anti-Corruption Policy, and Anti-Corruption Handbook.

5. Duties and Responsibilities of Related Personnel



5.1 Board of Directors

- Review, revise, and approve the Company's Anti-Corruption Risk Management Handbook.
- Determine and assign responsibilities related to the management of corruption-related risks.
- Supervise the implementation of corruption-related risk management measures and monitor operations to ensure that responsible parties have sufficient resources to effectively manage such risks.

5.2 Audit Committee

- Control, supervise, and maintain an overview of anti-corruption within the Company and consider the guidelines or activities proposed by the Internal Audit Department or Risk Management Committee for further action.
- Review the internal audit plan to ensure it covers the evaluation of the Company's internal control systems in accordance with anti-corruption risk management measures.

5.3 Executive Committee

- Support policies and promote organizational values related to the management of corruption-related risks within the Company and its subsidiaries.

5.4 Sustainability, Governance and Risk Management Committee

- Promote and drive collaboration in sustainable operations that align with good corporate governance principles, without creating corruption-related risks.
- Regularly assess risks and review the organization's overall risk management measures, including corruption risks, and consider approaches or activities proposed by the Anti-Corruption Risk Management Committee for approval and further implementation.

5.5 Nomination and Remuneration Committee

- Conduct matters related to the nomination of directors, including the evaluation of the Board of Directors' performance and the determination of remuneration in alignment with the Anti-Corruption Policy and Handbook.

5.6 Anti-Corruption Risk Management Committee

- Participate in the preparation of the Risk Management Handbook in accordance with the Anti-Corruption Policy and the Company's Anti-Corruption Handbook.
- Review existing risk management measures to ensure their appropriateness and that risks remain at an acceptable level.
- Regularly assess potential corruption-related risks.
- Propose risk management plans and corresponding measures to the Sustainability, Corporate Governance, and Risk Management Committee, the Audit Committee, and subsequently to the Board of Directors.

5.7 Human Resources Department

- Develop guidelines and communication channels to raise awareness among personnel in accordance with the Anti-Corruption Policy and Handbook.
- Organizing training to enhance employees' knowledge and capabilities for effective corruption prevention in their work.

5.8 Executives and Supervisors

- Prevent, detect, and investigate suspected corruption-related activities.
- Urgently report any identified concerns to the Anti-Corruption Risk Management Committee.

5.9 Internal Audit

- Verify and review the operations to ensure they are in accordance with the policies, guidelines, authority, regulations, and laws of regulatory agencies to ensure that there is an audit system that is suitable and sufficient to prevent potential corruption.
- Assess the internal control system of each process to cover the risks of corruption.
- Providing advice on internal audits and risk assessments in accordance with the internal audit system in anti-corruption policy.
- Report the found issues to the Audit Committee.

5.10 Employees

- Strictly study and follow the Anti-Corruption Policy and all related handbooks.
- Assist in preventing, detecting, and reporting suspected corruption-related activities.
- Be aware of risk factors and raise issues related to corruption risks to supervisors in a timely manner.

required to comply with both overarching and specific risk management policies and plans, as applicable, to ensure that corruption-related risks are managed appropriately and in a timely manner.

6.5 Risk Monitoring and Reporting

All departments are required to continuously monitor and report the results of their risk management activities to the Anti-Corruption Risk Management Committee. Performance internal control evaluation and improvement report must be prepared (Attachment 5), enabling the Anti-Corruption Risk Management Committee to report the results of policy and handbook implementation to the Sustainability, Corporate Governance and Risk Management Committee, the Audit Committee, and the Board of Directors annually.

6.6 Communication and Training

The Human Resources Department is responsible for providing training on anti-corruption risk management procedures and disseminating information through various channels such as onboarding programs, brochures, and the Company's website. These efforts ensure that all departments are informed and comply with the policies. Training also fosters employee participation in anti-corruption risk management, empowering personnel to contribute to the prevention and detection of corruption. Additionally, communications shall extend to business partners to demonstrate the Company's commitment to transparency and anti-corruption practices.

7. Internal Control and Audit

The Company has established guidelines to monitor and evaluate compliance with anti-corruption practices as follows:

- Require executives and employees to regularly conduct self-assessments regarding their compliance with the Anti-Corruption Risk Management Handbook and the Company's Business Ethics policies. This includes the Anti-Corruption Policy, the Ethics for Anti-Corruption Support, guidelines for preventing involvement in corruption, and employee work regulations.
- Establish an oversight and control unit responsible for auditing the internal control system, risk management, and corporate governance, and continuously providing recommendations. Audits shall be conducted according to the approved annual audit plan by the Audit Committee, with significant findings and recommendations reported to the Audit Committee.
- Assign the Internal Audit Department to assess the adequacy, appropriateness, effectiveness, and efficiency of the organization's internal controls, provide recommendations, and corrective actions to improve internal controls to effectively prevent and detect potential corruption risks. The Internal Audit Department shall discuss audit results with management to understand issues and develop practical improvement measures. Audit reports shall be submitted to the Audit Committee quarterly.
- If investigations find that audit data or complaints provide reasonable evidence of material impacts on the Company's financial position or performance, violations of laws, business ethics, anti-corruption measures, or doubts about financial reports or internal controls, the Audit Committee shall report to the Board of Directors for corrective action as deemed appropriate by the Audit Committee.

8. Reference Documents and Responsibilities

The principles or procedures outlined in this Anti-Corruption Risk Management 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.

9. Review and Improvement

This Anti-Corruption Risk Management Handbook is governed by the Anti-Corruption Risk Management Committee and the Audit Committee. The handbook shall be reviewed and updated annually (at least once per year) or whenever there are significant changes that may affect anti-corruption risk management. This is to ensure that the handbook remains consistent with the Company's practices and complies with applicable rules and regulations. Any revisions to this handbook must be approved by the Board of Directors and communicated throughout the organization.

This Anti-Corruption Risk Management 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.

Attachment 1: Corruption Risk Assessment Matrix

Corruption Risk Assessment Matrix

Likelihood		Very Low	Low	Moderate	High	Very High
		1	2	3	4	5
Impact / Severity	5	Medium	High	High	Very High	Very High
	4	Medium	Medium	High	High	Very High
3	Low	Medium	Medium	High	High	
2	Low	Medium	Medium	Medium	High	
1	Low	Low	Low	Medium	Medium	

Risk Level	Score Range
Very High	20-25
High	10-19
Medium	4-9
Low	1-3

Attachment 2: Likelihood and Impact Assessment Table for Corruption Risks

Corruption Risk Likelihood Table

Risk Level	Score	Probability	Average Frequency
Very High	5	The event is almost certain to occur regularly in all business operations.	More than once per year
High	4	The event is highly likely to occur regularly in most business operations.	Once every 2 years
Moderate	3	The event is likely to occur occasionally in business operations.	Once every 3–5 years
Low	2	The event is unlikely to occur in business operations.	Once every 5 years
Very Low	1	The event is highly unlikely to occur in business operations.	Once every 5–10 years

Corruption Impact Assessment Table

Impact Level	Score	Financial Aspect	Reputation and Image	Customer/Shareholder Aspect	Legal Aspect
Catastrophic	5	More than 31% of the total revenue	Company blacklisted; negative corporate governance image	The company was sued by customers/shareholders for damages	Contract/license revoked; top executives imprisoned
Major	4	Between 21% - 30% of total revenue	Continuous media coverage and public concern	Board and management are required to explain facts	Government agency investigation and charges filed
Moderate	3	Between 11% - 20% of total revenue	Social media spreads corruption-related news	Customers/shareholders question the board	The company may need to submit evidence and explain to the authorities
Minor	2	Between 5% - 10% of total revenue	Rumors possibly implicating internal staff or the company	Initial concerns and inquiries	Minor violations are subject to warnings or insignificant fines
Insignificant	1	Less than 5% of total revenue	Almost no impact	Almost no impact	Almost no impact

Attachment 3: Corruption Risk Reporting Form

No.	Business Activity	Risk Type	Description of Corruption Risk
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			

Attachment 4: Risk Assessment and Preventive Measures Form

No.	Business Activity	Risk Type	Description of Corruption Risk	Likelihood	Impact	Score	Risk Level	Preventive Measures
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								

Attachment 5: Internal Control Evaluation and Improvement Report Form

Department Name

Internal Control Evaluation and Improvement Report

For the fiscal year ended on day month year

Activity.....

Control Objective	Existing Risks and Causes	Existing Controls	Control Evaluation	Residual Risk Level	Control Improvement Measures	Due Date / Responsible	Remarks
	Risk Cause Impact		"Adequate or Inadequate"				
	Residual Risk Level (Before Improvement) (Likelihood x Impact)	Risk Level After Control (Likelihood x Impact)			Risk Level (After Control Improvement) (Likelihood x Impact)		

Evaluator's Name

(Name of the person preparing the Evaluation Report)

Position

Date / /

Reporter's Name

(Name of Subdivision Director / Supervisor)

Position

Date / /