

Anti-Corruption Policy and Guidelines

As we do business internationally, we must comply with a variety of anti-corruption laws. These laws apply to our interactions with governments and government officials. They also cover our dealings with patients and suppliers, as well as the dealings of third parties acting on our behalf.

The Company, its management, its directors, and its employees have important obligations under Thai and various anti-bribery and anti-corruption laws, including but not limited to the US Foreign Corrupt Practices Act (the FCPA), the UK Bribery Act, and similar laws in other jurisdictions. The Company, its subsidiaries, affiliated companies and associated companies must comply, and we must advise our suppliers and patients to comply with those laws wherever applicable.

The Company has developed the following simplified guideline to assist everyone in complying with this policy:

1. We require that no one will bribe or attempt to bribe anyone. A bribery is offering, giving, asking for or receiving anything for himself or another person with dishonest intent in return for exercising or not exercising his functions, whether wrongful or not. A bribe can be anything which has value, including money, property, discounts, entertainments, services, trainings, or any other benefits. Asking for a bribe can also be either exercising his functions or using his influence to procure a benefit for himself or another person, exercising or failing to exercise his functions in return for a bribe pursuant to an agreement entered into before he was appointed to his post, or agreeing to receive a bribe.
2. Everyone should not violate or knowingly permit anyone to violate this prohibition on bribery, or any applicable anti-corruption laws in performing work for the Company.
3. Facilitation payments are prohibited under certain laws. No one should make or receive facilitation payment.
4. The Company shall make appropriate charitable contribution, sponsorship, and business courtesies after careful consideration and in accordance with the law and good practice.
5. The Company shall conduct legal audits and internal investigations to verify compliance with the Thai and relevant legislations or to investigate potential payment improprieties.
6. The Company shall create compliance programs and conduct training for corporate personnel and senior management on Thai and relevant anti-bribery legislation.
7. It is important to the Company's reputation, and legal liability, that we engage only suppliers who comply with all applicable laws, including anti-corruption law. If there is any doubts or concerns about a supplier, we do not tolerate the engagement of such, but to choose another supplier.