



**Message from  
Chairman**

The Company is committed to conducting business with ethics. Therefore, it has established a code of conduct as a guideline for good business conduct for the Board of Directors, executives and employees to adhere to, it focuses on the important principles of corporate governance by creating a written code of conduct handbook, which is distributed throughout the organization so that all employees at all levels can study, understand and adhere to it as a guideline for continuous work.

This version of the Company's Code of Conduct is an update from the Company's Code of Conduct that was announced on June 22, 2016. It has been categorized and improved and updated to ensure it is comprehensive, covering rules relevant policies and guidelines for broader and clearer application to modern business operations.

All employees of the Company must study this Code of Conduct thoroughly and exercise discretion in performing their duties based on the principles of the Company's Code of Conduct. in order to continue practices and values that the Board of Directors, executives, and employees at all levels have prioritized and given serious importance to.

In this occasion, I would like to express my heartfelt gratitude to all employees of the company for adhering to our code of ethics and upholding the values of responsible citizens. All your commitment plays a vital role in preserving the company's reputation and integrity, ensuring the lasting honor and respect in the community.

Announced on July 2, 2021

( Mr.Apirag Vanich )  
Chairman of the Board  
Aikchol Hospital Public Company Limited



## **Introduction**

**Code of Conduct** is a set of good practices in business operations for the company's employees to adhere to and use as a guideline in performing their duties appropriately. It is considered a part of the regulations.

The Company's personnel have duties to act within the framework of ethics, morality, honesty, creativity, equality and equity according to the principles and practices set out in the Company's Code of Conduct, with the Company's directors acting as good examples. In the practice of specific professions, such as doctors, pharmacists, nurses, technicians, etc., they must strictly perform their duties according to the Code of Ethics in their practice of their profession, and it is considered part of the Company's ethical standards and code of conduct.

### **What should you do with ethics?**

1. Directors, executives and employees must be aware of and understand the principles and practices specified in the company's code of conduct, especially matters related to their duties and responsibilities.
2. Supervisors at all levels shall be responsible for ensuring that their subordinates strictly comply with this Code of Conduct.
3. Supervisors at all levels must be leaders in implementing the Code of Conduct and promote a working environment in which employees and related persons understand that following the Code of Conduct is the right thing to do and must be strictly followed, and cannot claim that they are not aware of the practices set out in this Code of Conduct.
4. The Human Resources Department has the duty and responsibility to explain to the company's new employees to understand the company's code of ethics and have all new employees sign and keep the signed acknowledgment document in each employee's work history.
5. Consult your supervisor or inquire in the company's ethics consultation system when you are not sure whether what you are about to do is in accordance with the company's ethics or not.
6. Communicate to other people you work with or related persons to understand the employee's work guidelines according to the company's code of ethics.
7. Report any actions that are not in accordance with the company's ethics through the channels specified by the company and cooperate in the fact-finding process.

### **What are the consequences if we do not comply with the company's code of ethics?**

1. Failure to comply with the principles and practices set out in the Company's Code of Conduct shall be judged according to the nature of the violation, intention or intent, evasion of ethics or misconduct, motive, importance and position of the violator, age, history and past conduct, environment of the case, adverse consequences resulting from the violation or other reasons



that should be taken into consideration, and may involve disciplinary or legal offenses in each case and may be subject to punishment according to the specified criteria.

2. In addition to the above non-compliance with the Company's Code of Conduct, supporting others to commit a violation of the Company's Code of Conduct, ignoring the Company's non-compliance with the Company's Code of Conduct, obstructing the fact-finding process, and acting unfairly toward those who provide information are also considered non-compliance with the Company's Code of Conduct.

### **Punishment**

The Company's Code of Conduct is a form of discipline that all directors, executives and employees must strictly adhere to. Employees who violate or do not comply with the Code of Conduct will be considered by the Company to impose disciplinary punishment in accordance with work regulations. If the action is illegal, the offender will also be subject to legal punishment.

### **What should you do if you encounter unethical behavior?**

The Company has a complaints and whistleblowing system that is in line with international standards. In the event that you know of or witness an act or are a victim of damage related to corruption, failure to comply with laws, regulations, company rules and the Company's code of conduct, you can provide information about such acts by doing the following:

1. Notify the recipient of the complaint through the specified complaint channel. However, it must not be a complaint of false information or harassment, which the company considers to be a violation of personnel management discipline.
2. The Company has a process for handling complaints and provides protection for employees who report complaints and provide tips.

### **Complainants / Informants will be protected.**

The Company has a policy of protecting and providing fairness to employees who report information or provide clues, those who are assigned to find facts about corruption or non-compliance with laws, regulations, Company regulations and the Company's code of conduct. Reporters, complainants or informants will be protected as follows:

1. Reporters, complainants, or cooperators can choose not to reveal themselves if they believe that revealing them will cause insecurity or damage. If the complainant or informant reveals their name, the company can report progress, clarify facts, or mitigate damages more conveniently and quickly.
2. The Company shall treat the relevant information as confidential and shall disclose it only as necessary, taking into account the safety and damage of the reporter, the source of the information or the person concerned.
3. In the event that the complainant believes that he/she may be unsafe or may suffer damage, the complainant may request the Company to set appropriate protection measures, or the



Company may set protection measures without the complainant having to request them if it is considered that there is a possibility of causing damage or distress.

4. Those who have suffered damage will receive relief through appropriate and fair processes.



## **Practices**

### **According to the company's Code of Conduct**

#### **Anti-Corruption and Corruption**

##### **Principle**

The Company's business operations with related business partners must be conducted correctly, straightforwardly, transparently, honestly, verifiably and without corruption, in accordance with relevant laws and the Company's anti-corruption policy, and must not cause any accusations or damage the Company's reputation.

##### **Guidelines**

1. No corruption and must be careful in high-risk work processes such as finance and accounting, sales and marketing, procurement, project work, investment, contract making, giving and receiving gifts, entertainment, giving donations or support, etc.
2. Do not neglect or ignore any acts that may be considered corruption related to the company. Report to your supervisor or responsible person and cooperate in the investigation of the facts.
3. Carry out the giving or receiving of donations and support in a transparent manner, in accordance with company regulations and in accordance with the law. You must ensure that the donations or support are not used for bribery.
4. Be careful when doing business with any person, entity or organization that is suspected of corruption.

#### **Giving or receiving gifts, property or other benefits**

##### **Principle**

Receiving or providing benefits, including property, services, facilitation or entertainment, to business associates must be in accordance with local or national customs and traditions, as well as applicable laws, must be of appropriate value and not create an unfair incentive to make decisions.

##### **Guidelines**

1. In the event that the supervisor considers that it is inappropriate to accept a gift, property or other benefits, return it to the giver immediately. If it cannot be returned, hand it over to the supervisor so that it becomes the company's right.
2. The Company's personnel and their families are prohibited from requesting or receiving gifts, property or other benefits from contractors, customers, business partners or any person involved in the Company's business under any circumstances.
3. Gifts given to the company and are valuable to commemorate important events of the company, such as receiving awards or souvenirs from participating in social welfare activities, etc., are allowed to be received on behalf of the company by employees at all levels.



4. Employees at all levels of the company should not give gifts to their supervisors, and supervisors shall not consent or condone their relatives to accept gifts from subordinate employees, except in cases where gifts are normally given to each other, but the price or value must not exceed 3,000 baht.
5. The Company's personnel are responsible for reporting the receipt of gifts, property or other benefits. The Company will regularly inform contractors, customers, business partners or those involved in the Company's business of the policy on receiving gifts, property or other benefits.
6. All levels of the Company's employees should not give, receive, or promise to give or receive any benefits or valuables to induce them to act or refrain from acting, including any actions that fall under the above.

### **Gifts and entertainment**

#### **Guidelines**

1. Before accepting or giving gifts and entertainment to business associates, one should make sure that the value of the items is appropriate for the occasion and that the local laws, regulations, notifications, rules or customs permit such action.
2. Do not accept or provide property, services, or entertainment that may influence or induce a decision or cause unfair performance of duties.
3. There must be evidence of spending showing the value of the property, service, or entertainment so that it can be verified.
4. In the event of being assigned or permitted by a superior to assist an external agency, the recipient may receive property, services, or entertainment in accordance with the criteria or standards set by that external agency.
5. Be careful when giving property, services, or entertainment to superiors or internal individuals/agencies, and when receiving property, services, or entertainment from subordinates or internal individuals/agencies. Such giving and receiving must not create unfair incentives for decision-making.

### **Conflict of Interest**

#### **Definition**

Conflict of interest means a situation or action in which an employee has a personal interest that affects the employee's decision-making or performance of duties in his or her position, and affects the benefits of the Company, either directly or indirectly.

#### **Principle**

The Company aims to do the right thing with the intention of achieving excellence at all times. Therefore, the work of employees must be based on the highest benefit of the Company under the law and ethics, by avoiding actions that create conflicts of interest that may affect any decision-making.



### **Guidelines**

1. Do not engage in any competitive business or become a partner, shareholder with decision-making power, director or executive in any business that competes with or is of the same nature as the Company's business.
2. Do not engage in transactions with contracting parties who are related to you, such as family, close relatives, persons who are close to you, or those in which you are the owner or partner, even if it is beneficial to the company.
3. Do not seek benefits from information or things that you or others know from your position and responsibilities.
4. Avoid involvement in any actions, whether with the Company's business partners or the Company's employees, that may cause conflicts of interest with the Company.
5. Avoid doing other work for personal gain apart from the company's work, which may affect the work under your responsibility and the company's image.
6. Employees are prohibited from using working time to regularly search for information, contact or trade securities or assets for their own benefit or that of others and not for the benefit of the Company.
7. In the event of any report that may cause a conflict of interest with the Company, it must be reported to the supervisor immediately.
8. In the event of any agenda item being considered by a meeting participant in which he or she has a conflict of interest, the person with a conflict of interest must temporarily leave the meeting to allow other meeting participants an opportunity to consider, analyze, and criticize without the influence of that person with a conflict of interest.

## **Human rights and labor**

### **Definition**

Human rights mean the basic rights that all human beings must be guaranteed or protected from discrimination solely because of differences in body, mind, race, nationality, religion, gender, language, age, skin color, education, social status or any other matter, in accordance with the laws of each country or the treaties to which each country is obligated to comply.

### **Principle**

The Company realizes the importance of respecting the human rights of all individuals by treating everyone equally, without discrimination, supporting and promoting human rights, and avoiding actions that violate human rights. In addition, the Company realizes the importance of labor by treating employees in accordance with labor laws and regulations related to labor fairly.

### **Guidelines**

1. Treat each other with respect, honor each other and treat each other equally without distinction in terms of physical, mental, race, nationality, religion, gender, language, age, skin color, education, social status or any other matter.



2. Exercise caution in performing duties to prevent the risk of human rights violations in business operations, including from those involved in business operations; monitor respect for human rights and report to superiors to prevent acts that violate human rights.
3. Treat equally in all employment processes from recruitment, compensation, working hours and holidays, job assignment, performance evaluation, training and development, advancement planning, etc. without discrimination.
4. Do not use forced labor, labor from human trafficking or unlawful child labor, including physical or mental cruelty to employees, whether by means of threats, confinement, intimidation, harassment or violence in any form.

#### **Remedial process when the company's operations cause human rights violations**

In the event that the Company's operations result in human rights violations, the Company will provide initial assistance and consider appropriate compensation.

#### **Confidentiality, retention of information, use of inside information and disclosure of information**

##### **Principle**

Confidential information is non-public information. It is information that if disclosed to the public or falls into the hands of competitors, will cause serious impacts to the Company, including all types of information that partners and customers have given to the Company with trust. The Company has a duty to keep such information confidential and make it known only to necessary persons. Therefore, it is the duty of the person in charge or possessor of the information to maintain its security.

##### **Guidelines**

1. The Company's personnel must maintain the confidentiality of the areas under their responsibility and must not let the confidentiality pass on to other persons, including other unrelated Company personnel.
2. The Company's personnel, even after retiring, resigning or ending their employment with the Company, must maintain and not disclose the Company's secrets.
3. The Company shall maintain and keep confidential customer information and trade information. Company personnel shall not disclose customer confidential information to Company personnel and unrelated third parties, unless required by law to do so, disclosed for the purpose of litigation, or the Board of Directors approves such disclosure.
4. Inside information is information concerning the operations and management of the Company's business, which is confidential information that has not yet been disclosed to the public. If disclosed, it will affect the Company, especially the value of shares traded on the Stock Exchange of Thailand. The Company's personnel must therefore keep inside information confidential and must not tell others about inside information that they have learned from performing their duties, or use inside information to seek improper benefits for themselves, or reduce the benefits of the Company.



5. Disclosure of information must be made by a person with direct authority, except for a person assigned by an authority to disclose that information. General personnel are not required to disclose information. When asked to disclose information that they are not required to disclose, advise the inquirer to ask the person who is required to disclose that information, so that the information provided is correct and in the same direction.
6. Disclosure of material information that has not yet been made public: Persons with the right to disclose information must disclose it carefully, accurately, completely, and timely, and ensure that all interested parties receive sufficient and equal information.
7. Any disclosure of other information must be based on facts and must not be intended to cause others to misunderstand the facts.
8. The Company's personnel who are in units with inside information are prohibited from trading in the Company's securities within 1 month prior to the disclosure of financial statements to the public.

## **Business competitors**

### **Principle**

The Company conducts business openly and transparently, does not create unfair competitive advantages, behaves within the framework of good rules and regulations, and treats its competitors honestly and fairly.

### **Guidelines**

1. Treat business competitors equally and fairly, and on the basis of receiving fair returns for both parties.
2. Do not seek confidential information of competitors by dishonest or improper means.
3. Do not damage the reputation of competitors by making malicious accusations, without truth or by improper means.

## **Consideration of safety, occupational health and working environment**

### **Principle**

The Company continuously develops and improves its operational efficiency in terms of safety, occupational health and environment for the safety of its employees and external parties who may be affected by its business operations.

### **Guidelines**

1. The Company places importance on safety. Directors, executives and employees must study and strictly comply with laws, policies, regulations and standards of quality, safety, occupational health and environment.
2. The Company has policies and practices regarding safety to control and prevent any loss in various forms resulting from accidents and errors that occur.
3. The Company has a control, prevention and emergency management plan to prepare for dealing with various emergency situations.



4. If any work is found to be unsafe or unable to comply with quality, safety, occupational health and environmental regulations and standards, or if the work is found to have an impact on the environment, notify the supervisor and relevant agencies for further corrective action.

## **Use of information and communication technology**

### **Principle**

The Company emphasizes the efficient and secure use of information technology systems in accordance with policies and regulations for the use of information technology. These systems must be protected from infringement or unauthorized use.

### **Guidelines**

1. Use the information technology system, including the information contained in the system, for the benefit of the company. Avoid using the system in a way that may infringe on the normal usage rights of others in matters unrelated to work or may affect the efficiency of the system.
2. The system must not be used to access or transmit information that is immoral, related to gambling, affects national security or violates the rights of others.
3. Use the system correctly according to the authorized rights. Keep your password safe and do not allow others to use it to access the system.
4. Avoid opening files from unknown sources and using data storage devices that have been used with computers suspected of having computer viruses or other malicious software.
5. Avoid installing computer programs by yourself, modifying or changing system settings that may affect security. If you encounter problems or find any abnormalities in use, contact the IT administrator.
6. All levels of the company's employees must not use computers to spy on, edit, view other people's files, or create false evidence that may lead to theft of information.
7. All levels of the Company's employees use the provided email and Internet for the Company's business with caution and do not bring disrepute to the Company's reputation and do not use the Company's name or logo in public electronic media.
8. All levels of the company's employees are responsible for supervising external persons to access data files and programs only as necessary for their work and to strictly comply with information and communication technology laws.
9. If the company finds that an employee has violated the law and the investigation results show that it is true, disciplinary action and/or legal action will be taken as appropriate, depending on the case.

## **Use and maintenance of company assets**

### **Definition**

The Company's assets refers to all types of assets, whether movable or immovable, intellectual property or any other assets that the Company owns or is responsible for managing.



**Principle**

The Company uses its assets efficiently and to its fullest benefit, and encourages employees to take care of its assets to prevent damage, loss, or use for personal gain or for others.

**Guidelines**

1. Use the company's assets efficiently and for the benefit of the company.
2. Do not use the company's assets for any illegal purposes or in any illegal way.
3. Maintain and protect the company's assets to prevent damage or loss.

**Intellectual property**

**Principle**

The Company's intellectual property is a valuable asset and is important in maintaining the Company's competitive advantage. It must be used with care and caution, and intellectual property rights must be respected.

**Guidelines**

1. All employees must respect intellectual property rights, not violate or misuse legitimate intellectual property rights.
2. All employees are responsible for protecting the company's intellectual property. Employees are allowed to use the company's intellectual property only for the benefit of the company, not for personal gain.
3. In the event that any other intellectual property rights arise from the work of employees assigned by the Company to create or are works that use the Company's information or are works learned from the Company, such intellectual property rights shall belong to the Company.

**Partners/Contractors**

**Principle**

The Company has a policy to treat its business partners, including creditors, equally and fairly, avoid situations that may lead to conflicts of interest, and comply with contractual obligations to provide true information.

**Guidelines**

1. There are clear procurement and hiring processes and contract terms and conditions or agreements to ensure fairness for all parties involved.
2. Comply with the terms and conditions of the contract or agreement with partners and contracting parties strictly, transparently and equally, and pay debts to partners and contracting parties on time.
3. There is an effective supplier registration and supplier selection system to ensure that suppliers are able to deliver supplies and services that meet the company's needs, deliver on time, and provide after-sales service. The scope of the assessment covers the assessment of potential



based on the assessment criteria established by the company and records suppliers in the Approved Vendor List (AVL) in the company's procurement process.

4. Do not demand, receive, or pay any trade benefits to business partners in a dishonest manner.
5. In the event that the conditions cannot be met, the business partner will be notified in advance to jointly consider finding a solution based on reasonable principles.

## **Political neutrality**

### **Principle**

The Company is politically neutral and does not take any action that favors or supports financially or in other forms any political party, political authority or political candidate, whether directly or indirectly, at the local, regional or national levels. However, the Company respects the political rights of its employees as good citizens under the Constitution, whether it is voting or being a member of a political party.

### **Guidelines**

1. Exercise your rights in your own name and avoid actions that may lead others to believe you are acting in the name of the company.
2. Do not express in any way that makes others understand that the company is involved in, supports political actions, political parties, political allies, political figures or political candidates.
3. Do not dress in an employee uniform or use any symbols that may lead others to believe that you are a company employee when attending a political meeting or gathering in any public place that is political in nature.
4. Avoid expressing or expressing political opinions in the workplace or during work hours that may cause conflicts at work.



### **Reporting of tips or complaints**

The Board of Directors provides employees and stakeholders with a channel to file complaints and report any illegal or unethical acts, including inaccurate financial reporting or defective internal control processes, as follows:

#### **Channels for reporting tips or complaints**

1. Through the website of the complaints and whistleblowing system
2. Verbally or in writing/ E-mail address : [cg@aikchol.com](mailto:cg@aikchol.com)/ Letter (with or without the name of the informant)

#### **Complaint recipient**

1. Commander
2. HR Manager/ HR Department Head
3. Company Secretary
4. Chairman of the Board of Directors
5. Audit Committee
6. Board of Directors

#### **Process for handling when receiving a tip or complaint**

The company provides employees with channels to file complaints and provide information as a guideline for development and sustainability of the organization as follows:

1. The complainant shall collect facts related to the violation or non-compliance with ethics confidentially.
2. The recipient of the complaint reports the facts to the independent committee, who performs the duty of investigating the facts to consider the complaint, separating the related issues into management issues, knowledge development issues, fact-checking issues, etc.
3. **Action measures:** The recipient of the complaint shall present the matter to an independent committee to investigate the facts and determine action measures to stop any violation or non-compliance with the law or ethics.
4. **Reporting of results:** The recipient of the complaint has a duty to inform the complainant of the results. If the complainant reveals himself/herself, in the case of an important matter, the results must be reported to the chairman and/or the Board of Directors.

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