Anti-Corruption Policy

Siemens Healthcare Limited

Siemens Healthcare Limited, we conduct business with honesty, integrity, transparency, and complies with the laws related to prevention of all forms of corruption, both direct and indirect. We adhere to the organization's values, business ethics (Business Conduct Guideline), and follows the principles of good corporate governance.

To ensure that we have appropriate policies for defining responsibilities, practices, and procedures in place to prevent corruption, we have developed a written anti-corruption policy. This policy is intended to be strictly followed by the board members, directors, executives, employees, as well as all relevant stakeholders.

Definitions

"**The company**" means Siemens Healthcare Limited

"**Employees**" means Directors, Executives and all other employee

"**Stakeholders**" means representatives, agent, business partners such as distributors, or any other individuals in a similar capacity

"**Corruption**" means any action taken to obtain an improper benefit, whether for oneself or others, that is not in accordance with the law. This includes actions such as:

(1) **Embezzlement** means the act of taking possession of property that belongs to someone else or is owned by another party, and wrongfully appropriating that property for oneself or a third party

(2) **Fraud** means to deceiving others by making false statements or concealing facts that should be truthfully disclosed, which results in obtaining property or causing the deceived party or a third party to revoke or destroy any legal documents

(3) **Corruption** means the act of requesting, accepting, or offering to give, promising, or offering property, gifts, or other benefits to public officials, government agencies, private sector officials, private organizations, or healthcare service providers, in order to influence or persuade an individual or entity to use their power to act or refrain from acting, to expedite or delay actions that are improper or outside of their duties, resulting in the acquisition of benefits inappropriately, whether for oneself or others, or to maintain an improper business or benefit

"**Property**" or "**Benefit**" means items, money, gifts, or any other benefits that can be quantified in monetary terms, including the granting of special privileges that are not available to the general public, such as receiving

discounts on goods, receiving services or entertainment, or covering expenses for travel or tourism, accommodation, meals, arranging employment, or anything else of a similar nature. This includes gifts in the form of tickets, vouchers, or other evidence, as well as advance payments or reimbursements

Enforcement

This Anti-Corruption Policy of **Siemens Healthcare Limited** is applicable to the board members, directors, executives, all employees, as well as stakeholders associated with the company. This policy shall be effective from the date of its announcement onward.

Roles and Responsibilities

1. **Directors and executives**
   - 1.1 Responsible for creating and promoting the organizational culture of conducting business with honesty, ethics, compliance with laws, internal company regulations, and business ethics (Business Conduct Guideline)
   - 1.2 Consider and approve anti-corruption policies, oversee the provision of necessary resources and support to create an effective anti-corruption system
   - 1.3 Establish regulations and measures for employees to follow, including the determination of disciplinary penalties
   - 1.4 Establish a working system that promotes and supports anti-corruption efforts, as well as review the adequacy of the systems and measures in place
   - 1.5 Promote and communicate to employees and all relevant parties to ensure they have knowledge and understanding of this policy
   - 1.6 Establish channels for reporting tips and information or complaints, as well as measures to protect whistleblowers or complainants
   - 1.7 Regularly review and improve the policy and anti-bribery management system to align with changing laws and emerging risks
   - 1.8 Reports the results of the operations / performance to the responsible committee

2. **Legal and Compliance officer / Head of Legal and Compliance**

   Regularly review, monitor, and evaluate the implementation of the anti-corruption policy and report the results to the Board of Directors consistently. Receive reports or complaints and various tips or information that indicate actions violating the business ethics (Business Conduct Guideline) or this policy

3. **Employees**

   Must understand and adhere to the anti-corruption policy, avoid involvement in both direct and indirect corruption, and report any suspicious case of corruption though the company's reporting channels

4. **Stakeholders such as business partners**

   Must adhere to the same standards of honesty, integrity, and ethics as the company, and comply with all applicable anti-corruption laws and regulations. We will engage only with business partners who share a mutual commitment to preventing bribery and corruption

Guidelines

1. All employees and stakeholders must strictly adhere to the company's anti-corruption policy, avoid engaging in corruption and bribery in all forms, both direct and indirect. They must not ignore or neglect any instance of corruption in the company's dealings or business operations, regardless of where it occurs. They must report it to the management or the responsible individuals and cooperate in the investigation of the facts

2. In the regular business operations, employees and stakeholders must comply with the laws applicable in the countries where the company operates. They must also adhere to the company's internal regulations and control measures. Since the parent company, located in Germany, is a member of the Asia -Pacific Medical Technology Association, the company must follow the ethical code of this association (APAC Med Code for Ethical Conduct for Interactions with Healthcare Professionals), as well as the codes of ethics of other associations in the medical technology industry to which the company is a member, such as the sales and marketing code of the Thai Medical Device Technology Industry Association

3. The company has no policy of paying facilitation fees or expediting payments in any form, whether direct or indirect, to facilitate business operations. Such actions are considered illegal

4. Purchasing and Procurement must be conducted in accordance with the criteria or procedures set out in the company's internal regulations, ensuring fairness and transparency in the process. Consideration should be given to the reasonableness of price, quality, and after-sales service, as well as the standards that products or services should meet. In addition, employees must not engage in business activities that result in personal benefits by exploiting their position in procurement, whether directly or indirectly. They must also not use information acquired through procurement activities for personal or others gain

5. Conflict of interest must be avoided. Business decisions should be made in the best interest of the company and not for personal gain. If any actions or circumstances arise that could lead to a conflict of interest

with the company, the employee involved must report the conflict of interest through the company's reporting channels

6. The company competes in business fairly, based on the quality and standards of its products and services. All Employees and stakeholders must keep business information confidential at all times

7. The company maintains accurate and transparent accounting records and keeps transactions and communications properly documented to ensure that the company's business operations are fair, transparent, and auditable

8. The company maintains political neutrality and does not engage in any actions that could be considered as endorsing or providing financial or any other form of support to political parties, political coalitions, or political figures, whether directly or indirectly

Communication and publicizing of the anti-corruption policy and guidelines

9. The company communicates the anti-corruption policy and guidelines to all employees, stakeholders associated with the company, as well as external parties, as follows:

(a) Announce the anti-corruption policy in prominent locations to ensure that everyone in the organization is aware

(b) Announce the anti-corruption policy through the company's website under the topic of compliance, which is set to public access and can be found at https://www.siemens-healthineers.com/en-th/anti-corruption-policy , as well as during the company's annual Townhall meeting

(c) Company's Intranet

Training for Directors, board members, executives, or employees on anti-corruption

10. The company provides orientation, training, meetings, or various activities related to the anti-corruption policy and business ethics (Business Conduct Guideline) for Directors, board members, executives, employees and stakeholders as determined by the company, or arranges additional training whenever necessary, in order to raise awareness and establish practices for conducting business in a transparent and fair manner, such as:

(a) Orientation for Employees

- Through online training on business operations practices and business ethics (Business Conduct Guidelines Awareness Training) and
- Compliance in-person Training

(b) Provide online training for employees on legal compliance and regulations (Compliance Basic Training)

(c) Provide annual online training to stakeholders, such as business partners, on legal compliance and the code of ethics of the Medical Devices Technology Association, and ensure the proper and auditable financial accounting (Compliance Refresher Training)

(d) Provide In-person training for the new board member by the Head of Legal and Compliance

Managers have the responsibility to ensure and follow up to make sure that employees attend the mandatory or required training within the specified time

Review the anti-corruption policy and guidelines at least every 3 years

11. The anti-corruption policy and guidelines are reviewed regularly every 3 years or whenever there are significant changes, in order to update them to align with the changes in legal provisions and emerging risks

Channels or systems for reporting information related to corruption

12. If any illegal actions, violation of ethics, corruption, or any indication of corrupt practices, or breaches of this policy, both direct and indirect are observed, reporting can be made through the following channels:

- "Let Us Know" Website https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=19sh8&c=-1&language=tha reporting through this channel can be done anonymously
- Head of Legal and Compliance via email tunmika.sarakoses@siemens-healthineers.com
- Or report to their manager / supervisor

Whistleblowers will be protected, and the information will be kept confidential, without any impact on their job position, both during the investigation process and after it is completed. The company will conduct the investigation fairly, and the whistleblower must cooperate in verifying the facts

Any actions of intimidation, harassment, or creating fear towards the complaint or whistleblower are considered violations of the company's policy, and the company will take disciplinary action against the individual involved

Penalties and regulations for individuals involved in corrupt practices

13. Employee who violates the laws and/or internal regulations, including the company's anti-corruption policy, will be subject to disciplinary action as determined by the company. Additionally, they may face civil and criminal penalties if their actions are in violation of the law

Announcement made on 6th March 2025



Electronically signed by: Christopher Pawel Poray-Wilczynski
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Mr. Christopher Pawel Poray-Wilczynski

Director



Electronically signed by: Panarat Theplertbun
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Miss Panarat Theplertbun

Director