

Anti-Money Laundering and Combating the Financing of Terrorism and Proliferation of Weapons of Mass Destruction: AML/CFT/WMD AEON Thana Sinsap (Thailand) Public Company Limited

AEONTS and subsidiaries are committed to combating money-laundering and financing of terrorism and the proliferation of weapons of mass destruction to be complied with the applicable laws and regulation of legal entity and to be complied with AFS Group's AML/CFT policy.

We are taking into the account its social responsibility as a financial institution, company and corporate group, considers the prevention of money laundering and terrorist financing to be one of its most important management issues.

To ensure that compliance with the laws concerning Anti-Money Laundering, Combating the Financing of Terrorism and the Proliferation of Weapons of Mass Destruction (AML/CFT/WMD) is complete, successful and efficient as applicable laws, the Company therefore implements the AML/CFT/WMD policy as follows:

1. The Company supports and strictly complies with the applicable laws and regulations on Anti-Money Laundering, Combating the Financing of Terrorism and the Proliferation of Weapons of Mass Destruction to ensure that the completion of the customer due diligence which includes the customer's identification and verification process, transaction reporting and other duties as stipulated in laws and regulations.
2. The Company will develop the primary and subordinate of AML/CFT/WMD policies and guidelines which cover the following topics: customer acceptance principles including unacceptance criteria. The process should include but not limit to Know-Your-Customer (KYC) and Customer Due Diligence (CDD), Identification and Verification of customer and beneficial owner, Name screening against watchlist and designated person, risk assessment, the approval or rejection of establishment of relationship transaction reporting and the termination of customer's relationship.
3. The Company develop policy, regulation, procedure and guidance to manage and mitigate the customer's risk in Money Laundering risk, Financing Terrorist and Proliferation Financing of weapons mass destruction since establish relationship until exit relationship. The process to assessment money laundering is start from Know-Your-Customer ("KYC") to identification and verification the customer identity, the customer's risk assessment to assess the customer's risk, transaction monitoring process to monitor the customer's transaction and report the regulator if required. To achieve money laundering risk management, the company shall develop the related policy and procedure applicable to all products/services and channels to meet the regulatory requirement and shall complete the process of identification and assessment of ML risks prior to the launch of new products, service, business practices, delivery channels or mechanisms or application of new technology to existing products and services.

4. The Company shall submit the transaction reporting to AMLO and will develop the policy which includes all transaction reporting categories, method, process and timeframe as per regulatory requirement.
5. The company shall develop independent internal control which meets the company risk management and the business size by developing the policy to be complied with AMLO regulations and applicable laws.
6. The company shall develop the sharing information policy and related materials among group of company, branches and subsidiaries, both local and oversea entity.
7. The company shall retain the KYC/CDD information and transaction information as stipulated by laws and regulations.
8. The company shall not support the directors, executives, staffs, employees and anyone who acts on behalf of company to involve, support, and willful blindness in AML/CFT/WMD including prohibited by law from disclosing ("tipping-off") the fact that a suspicious transaction report (STR) or related information i.e. KYC, AMLO reporting is being filed with AMLO. But these provisions are not intended to inhibit information sharing required for the purposes of lawful duty money laundering or sharing information among branches and subsidiaries when necessary for AML/CFT purposes.
9. The company shall appoint the management to oversight and oversee the AML/CFT/PF risk regarded as the highest importance responsibility and to be complied with the applicable laws and regulations including the internal policy and intra-group management.
10. The company shall provide and enhance the staff's knowledge and understanding on the compliance with the applicable laws, policies and guidelines regarding Anti-Money Laundering, Combating the Financing of Terrorism and the Proliferation of Weapons of Mass Destruction as well as provides training of such as per the training policy of the Company to the Company's staffs to ensure that the Company's staffs have sufficient and efficient knowledge to perform the responsibility relation to AML/CFT/PF.
11. The Company shall arrange to have its internal audit program regarding the compliance with the primary and subordinate policies as well as guidelines on Anti-Money Laundering, Combating the Financing of Terrorism and the Proliferation of Weapons of Mass Destruction by ensuring that the internal audit program is performed independently without the conflicts of interest.
12. The Company will set out policy and procedures of information sharing in regards with AML/CFT/WMD between the company and branches, subsidies, located in Thailand and oversea that are the same group by having in place measure for strictly safeguarding the shared information. In case there is a domestic law or foreign law prescribing the use, or sharing of customer's information, it should follow such law.
13. The Company must set out internal control and measure of sharing information between branches or affiliated companies within the same business group.