

## Anti- Money Laundering and Combating the Financing of Terrorism: AML/CFT

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Pro Inside Public Company Limited

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### Anti- Money Laundering and Combating the Financing of Terrorism: AML/CFT

The Anti-Money Laundering and Counter-Terrorism Financing Policy and Measures are established to set the Company's practices in monitoring and preventing the use or intention to use the Company's products or services in activities or actions related to money laundering, terrorist financing, including setting minimum measures for all employees to implement any processes or control measures to comply with the Anti-Money Laundering and Counter-Terrorism Financing Policy.

#### 1. The objectives of this policy and measures are as follows:

- 1.1 To identify, mitigate and manage risks that may occur to the Company from customers or services being involved or being used as channels for money laundering or financial support for terrorism.
- 1.2 To protect the Company's reputation by using the highest possible preventive measures and conducting customer screening to prevent the use of the Company's services for money laundering, financial support for terrorism, and other offenses.
- 1.3 To ensure that the Company complies with laws related to anti-money laundering and countering the financial support for terrorism in order to prevent civil and criminal offenses.

Failure to comply with this policy and measures may lead to civil and criminal liability or other offenses against the Company or its employees, including damage to the Company's reputation. The main management measures include Know Your Customer (KYC), Customer Due Diligence (CDD), and transaction reporting to the Anti-Money Laundering Office (AMLO).

#### 2. Duties and Responsibilities

##### 2.1 The Company's executives have the following duties and responsibilities:

- 2.1.1 Must give importance to the prevention and suppression of money laundering and the prevention and suppression of financial support for terrorism and the proliferation of weapons of mass destruction by requiring employees to strictly comply with the Company's laws, policies, regulations, orders and practices.
- 2.1.2 Consider, exercise discretion and approve procedures for operations both in normal cases and cases that require special screening during the customer acceptance process, customer risk assessment and customer fact-finding investigation.
- 2.1.3 Establish measures to control and manage risks related to money laundering and financial support for terrorism and the proliferation of weapons of mass destruction that may arise from the use of various transaction channels, products or services.

- 2.1.4 Establish an order and a work manual that is consistent with the anti-money laundering and suppression policies and the prevention and suppression of financing for terrorism and the proliferation of weapons of mass destruction, in accordance with the practices set by the AMLO.
- 2.1.5 Supervise and inspect the performance of employees to ensure that they strictly comply with the orders, regulations, and practices in accordance with the anti-money laundering and suppression policies and the prevention and suppression of financing for terrorism and the proliferation of weapons of mass destruction.
- 2.1.6 Support and promote employees to have sufficient knowledge and understanding of anti-money laundering and the prevention and suppression of financing for terrorism and the proliferation of weapons of mass destruction, so that they can effectively perform their duties in the customer acceptance process, risk management, and customer fact-finding investigation.

2.2 All levels of employees have the following duties and responsibilities:

All levels of employees are required to strictly comply with the orders, regulations and practices set by the Company under the Anti-Money Laundering and Anti-Terrorism and Proliferation of Weapons of Mass Destruction Financing Policy.

### **3. Essence of the policy and procedures on anti-money laundering and anti-financialization and prevention and suppression of terrorism financing and proliferation of weapons of mass destruction.**

Consisting of

#### **3.1 Policy and procedures for accepting customers**

The Company has established a process for verifying the facts about customers. This is a process that must be completed before establishing a business relationship or refusing to establish a business relationship with a customer. This must be done in accordance with the criteria for arranging for customers to identify themselves, identifying customers, and verifying their identities. Verification of the facts about customers must be completed in the following cases:

- 3.1.1 When starting a business relationship with a customer
- 3.1.2 When there is an occasional transaction as follows:
  - (a) Any transaction other than (b) and (c), whether a single transaction with a value of one hundred thousand baht or more, or multiple transactions with a combined value of one hundred thousand baht or more. The principle of considering continuity is to consider the transaction within 1 business day of the reporting person. For example, in the case of providing services at the office or branch of the reporting person, the transaction of the

same transactor may be examined within 1 day and during the business hours of the office or branch of the reporting person. However, if the service is provided via electronic channels, the transaction of the transactor within the same channel, the same device, within 1 day or within 24 hours of the service provided via such channels shall be considered.

- (b) Providing a payment service on behalf of each transaction with a value of 500,000 baht (five hundred thousand baht) or more, or
- (ค) Providing an electronic money service or electronic money transfer service each time with a value of 50,000 baht (fifty thousand baht) or more.

3.1.3 When there is reasonable suspicion that it may be involved in the commission of a basic offense, money laundering or financing of terrorism or the proliferation of weapons of mass destruction.

3.1.4 When there is doubt about the identity of the customer.

Including providing guidelines for personnel to follow the procedures for arranging for the customer to identify themselves, the procedures for identifying the customer, the procedures for verifying the customer's information, the procedures for verifying the customer, and the procedures for approving or rejecting the establishment of a business relationship with the customer.

### 3.2 Risk Management Policies and Procedures

The Company has established principles for managing risks related to money laundering and financing terrorism and the proliferation of weapons of mass destruction, which can be divided as follows:

- 3.2.1 Policies and procedures for assessing and managing risks related to money laundering and financing terrorism and the proliferation of weapons of mass destruction within the organization. The Company has established criteria and methods, considering principles and factors in assessing risks in accordance with the law, including establishing measures and methods for mitigating risks appropriately.
- 3.2.2 Policies and procedures for managing customer risks. The Company has established criteria and risk factors to assess customer risks in accordance with the law, and will conduct risk management throughout the duration of the relationship with the customer and will end when the business relationship is terminated. The Company has established a manual for personnel to follow in managing customer risks in all types of services and in all service channels.
- 3.2.3 Policies and procedures for assessing risks for products, services and service channels. The Company will establish criteria and risk factors in assessing risks for products, services and service channels in accordance with the law. In the event that the Company launches new products or services, or develops new products and business methods, or has new service

mechanisms, Or the use of new or developing technologies for both new and existing products, the Company will conduct measures to assess the risks of money laundering and financing of terrorism and the proliferation of weapons of mass destruction that may arise from the development of new products and business methods, including new mechanisms for providing services or the use of new or developing technologies for both new and existing products, and determine appropriate measures to mitigate risks of money laundering and terrorism and the proliferation of weapons of mass destruction that may arise before introducing new products, new services, or the use of new technologies.

### 3.3 Transaction Reporting

Set guidelines for transaction reporting in accordance with the forms, periods, criteria and methods prescribed by law, in accordance with the transaction reporting practices.

### 3.4 Document retention

The Company requires retention of details regarding identification, transactions and records of facts regarding transactions that must be reported. Occasional investigations to determine facts about customers and transactors shall be conducted in accordance with the law. If the AMLO Office requests to verify information, the Company has the information available for verification and can submit information as requested by the AMLO Office within the specified time.

### 3.5 Recruitment of employees or personnel

The Company has set guidelines for achieving the goals in recruiting employees or personnel. Before employees/personnel start working, such employees/personnel must know and understand their duties according to the policies and procedures related to compliance with the law on anti-money laundering and prevention and suppression of financing for terrorism and the proliferation of weapons of mass destruction, and methods for arranging for customers to identify themselves and conduct inspections to find out the facts about customers.

In addition, the Company will arrange for employees to receive training on anti-money laundering and prevention and suppression of financing for terrorism and the proliferation of weapons of mass destruction on an ongoing basis.

### 3.6 Internal Audit

The Company has established an independent internal audit mechanism to review the operating system and compliance with the Anti-Money Laundering Act and the Act on the Prevention and Suppression of Financing for Terrorism and the Proliferation of Weapons of Mass Destruction.

### 3.7 Development and Improvement of Policies and Procedures

The Company has established a plan to develop and improve policies and procedures, including practices, procedures, and manuals related to compliance with the Anti-Money Laundering Act and the Act on the Prevention and Suppression of Financing for Terrorism and the Proliferation of Weapons of Mass Destruction, or other relevant laws, which must be reviewed periodically and kept up-to-date. The Company reviews policies and procedures, including practices, procedures, and manuals to ensure they are still in compliance with applicable laws at least once a year, or immediately when the Company learns that laws or government regulations have changed.

Approved by the Board of Directors Meeting No. 3/2024

On February 27, 2024