

Anti- Money Laundering and Combating the Financing of Terrorism AMLCFT

Pro Inside Public Company Limited

This Anti-Money Laundering and Counter-Terrorism Financing Policy has been prepared to set out practice guidelines for the Company, as well as its subsidiaries, affiliated companies, or other companies over which the Company has controlling authority, in examining and reducing the Company's risk of being used as a tool to support financial crime, and in preventing the use, or intended use, of the Company's products or services in activities or conduct relating to money laundering or the financing of terrorism, including establishing minimum measures for all employees when developing any process or control measure, so as to be consistent with, and comply with, the Anti-Money Laundering Act B.E. 2542 (1999) (the "Anti-Money Laundering Law") and the Anti-Terrorism Financing and Proliferation of Weapons of Mass Destruction Financing Act B.E. 2559 (2016) (the "Law on the Prevention and Suppression of the Financing of Terrorism and the Proliferation of Weapons of Mass Destruction").

Subsidiaries, associated companies, and affiliated companies are encouraged to consider adapting this policy to their own business context, through each company's internal approval process.

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

1. To identify, mitigate, and manage risks that may arise for the Company from a customer or service being connected with, or used as a channel for, money laundering or the financing of terrorism, in the event the Company conducts business under section 16 of the Anti-Money Laundering Act B.E. 2542 (1999), which carries a duty to report transactions to the Anti-Money Laundering Office (AMLO) where a transaction involves cash exceeding the amount specified in the ministerial regulation, or is a transaction giving reasonable grounds for suspicion.
2. To protect the Company's reputation by employing the highest possible level of preventive measures and providing customer screening to prevent the use of the Company's services for money laundering, the financing of terrorism, or any other wrongdoing.
3. To ensure that the Company complies with laws relating to the prevention and suppression of money laundering and the prevention and suppression of the financing of terrorism, in order to prevent both civil and criminal offences.

Violation of, or non-compliance with, this policy may result in civil or criminal liability, or other offences, against the Company or its employees, including damage to the Company's reputation. The principal

measures for managing this include Know Your Customer (KYC), Customer Due Diligence (CDD), and reporting of transactions to the Anti-Money Laundering Office (AMLO).

2. Definitions

Money Laundering means the transfer, receipt of transfer, or conversion of assets connected with certain offences, in order to conceal or disguise the source of such assets, or to help another person avoid or reduce punishment, or to conceal or disguise the acquisition thereof, etc., such assets being connected with the commission of an offence.

Financing of Terrorism and the Proliferation of Weapons of Mass Destruction means the intentional and unlawful provision or raising of funds (whether directly or indirectly) with the aim of using, or knowing that they will be used, to support terrorism or the proliferation of weapons of mass destruction, which is an international problem that affects the security and effectiveness of the financial system, undermines the economy, and also destroys society.

Customer means a natural person, juristic person, or person with a legal arrangement, who establishes a business relationship or conducts a transaction with the Company.

Business Partner means a natural person or juristic person who enters into a contract to buy, sell, or provide services, or who is a business ally of the Company, in order to conduct business together and create shared added value, and who may be a seller, service provider, contractor, co-investor, or ally in another form, in order to achieve both parties' business goals.

Transaction means an activity relating to a legal act, contract, or any undertaking with another person, financial or business in nature, or an undertaking relating to assets.

Know Your Customer (KYC) means obtaining information from customers and business partners and verifying the accuracy and reliability of the information received, in order to determine whether the customer or business partner poses a risk of money laundering, the financing of terrorism, or the proliferation of weapons of mass destruction such that the relationship should be declined, together with using the information obtained to assess risk.

Customer Due Diligence (CDD) means the process of monitoring, examining, and reviewing the financial movements or transactions of customers and business partners on a regular basis, in order to prevent financial crime, such as money laundering, fraud, and the financing of terrorism.

3. Duties and Responsibilities

3.1 The Board of Directors has the duty to consider approving and adopting the Anti-Money Laundering and Counter-Terrorism Financing Policy.

3.2 The Company's management has the following duties and responsibilities:

- 1.1 Must give importance to the prevention and suppression of money laundering, and the prevention and suppression of the financing of terrorism and the proliferation of weapons of mass destruction, by requiring employees to strictly comply with the law, policies, regulations, orders, and practices of the Company.
- 1.2 Exercise judgment and approve operating procedures, both in ordinary cases and cases requiring special scrutiny, in the process of onboarding, risk assessment, and Customer Due Diligence.
- 1.3 Establish control and risk management measures for money laundering and the financing of terrorism and the proliferation of weapons of mass destruction that may arise from the use of transaction channels, products, or services.
- 1.4 Establish orders and operating manuals consistent with the anti-money laundering and counter-terrorism financing policy, in accordance with the guidelines set by AMLO.
- 1.5 Oversee and inspect employees' performance to ensure it complies strictly with the orders, regulations, and practices under the anti-money laundering and counter-terrorism financing policy.
- 1.6 Support and promote employees' sufficient knowledge and understanding of the prevention and suppression of money laundering, and the prevention and suppression of the financing of terrorism and the proliferation of weapons of mass destruction, so that they can effectively perform customer and business partner onboarding, risk management, and Customer Due Diligence.

3.3 Employees at every level have the following duties and responsibilities:

- 1.1 Employees at every level, and management, have the duty to comply strictly with the orders, regulations, and practices established by the Company under the policy on the

prevention and suppression of money laundering, and the prevention and suppression of the financing of terrorism and the proliferation of weapons of mass destruction.

- 1.2 Report or provide a tip upon discovering suspicious or abnormal conduct relating to money laundering or the financing of terrorism, through the channel and method set out in the Whistleblower Policy.

4. Practice Guidelines

1. Conduct business with trustworthy customers and operate lawfully, avoiding establishing business relationships with persons or juristic persons suspected of possible unlawful conduct.
2. Comply with the procedures established by the Company for Know Your Customer (KYC) checks and Customer Due Diligence (CDD) before establishing a business relationship.
3. Comply with the practice guidelines for requiring customers and business partners to identify themselves, the identification process, the customer information verification process, the process for ascertaining customers and business partners, and the process for approving or declining to establish a business relationship with customers and business partners, in the event the Company is an operator under section 16 of the Anti-Money Laundering Act B.E. 2542 (1999), whereby Customer Due Diligence must be completed beforehand in the following cases:
 - 1.1 When first establishing a business relationship with a customer or business partner.
 - 1.2 When conducting an occasional transaction, as follows:
 - (a) Any other transaction not covered by (b) and (c), whether a single transaction of at least THB 100,000, or several connected transactions with a combined value of at least THB 100,000 — the principle for determining connectedness is based on transactions occurring within 1 business day of the reporting entity; for example, for services provided at the office or branch of the reporting entity, transactions of the same person may be examined within the same 1 day and business hours of the reporting office or branch, but for services provided through an electronic channel, this is determined based on the transactions of the same person through the same channel and same device within 1 day, or within 24 hours during which the channel is open for service.
 - (b) A payment collection service, in each instance valued at THB 500,000 (five hundred thousand baht) or more; or

- (c) An e-money service or an electronic funds transfer service, in each instance valued at THB 50,000 (fifty thousand baht) or more.
- 1.1 When there is reasonable cause for suspicion that the matter may relate to a predicate offence of money laundering, or the financing of terrorism or the proliferation of weapons of mass destruction.
- 1.2 When there is doubt regarding a customer's identity information.

4.4 Risk Management Methods

The Company establishes principles for managing the risk of money laundering and the financing of terrorism and the proliferation of weapons of mass destruction, which can be divided as follows:

- 1.1 Procedures for assessing and managing the risk of money laundering and the financing of terrorism and the proliferation of weapons of mass destruction within the organization: the Company establishes criteria and methods, considering the principles and factors for risk assessment consistent with legal requirements, including establishing appropriate risk mitigation measures and methods.
- 1.2 Procedures for managing customer risk: the Company establishes criteria and risk factors for assessing customer risk in accordance with legal requirements, and will carry out risk management throughout the duration of the customer relationship, ending when the business relationship terminates. In this regard, the Company has established a practice manual for personnel to follow in managing customer risk across every type of service and every service channel.
- 1.3 Procedures for assessing risk for products, services, and service channels: the Company will establish criteria and risk factors for assessing risk for products, services, and service channels, consistent with legal requirements. Where the Company introduces a new product or service, or develops a new product and method of conducting business, or a new mechanism for providing services, or the use of new technology, or technology under development, for both new and existing products, the Company will establish measures to assess the risk of money laundering and the financing of terrorism and the proliferation of weapons of mass destruction that may arise from the development of new products and methods of conducting business, including new mechanisms for providing services or the

use of new or developing technology for both new and existing products, and will establish appropriate measures for mitigating the risk of money laundering and terrorism and the proliferation of weapons of mass destruction that may arise, prior to launching a new product, new service, or the use of new technology.

4.5 Transaction Reporting

The Company establishes guidelines for reporting transactions in accordance with the form, timeframe, criteria, and methods prescribed by law, following its transaction reporting practice.

4.6 Document Retention

The Company requires the retention of details relating to identification, transactions conducted, and records of facts relating to reportable transactions, and Customer Due Diligence relating to customers and persons conducting occasional transactions, in accordance with legal requirements. Where AMLO requests to examine information, the Company shall have information available for inspection and shall be able to provide information requested by AMLO within the specified timeframe.

4.7 Employee Training

The Company will provide ongoing training on the prevention and suppression of money laundering and countering the financing of terrorism and the proliferation of weapons of mass destruction, as part of the code of business conduct curriculum for executives and employees.

4.8 Internal Audit

The Company shall provide an independent internal audit mechanism to examine the operating system and compliance with the law on the prevention and suppression of money laundering and the law on the prevention and suppression of the financing of terrorism and the proliferation of weapons of mass destruction.

4.9 Development and Improvement of Policy and Procedures

The Company sets out a plan to develop and improve its policy and procedures, including practice guidelines, operating methods, and practice manuals relating to compliance with the law on the prevention and suppression of money laundering and the law on the prevention and suppression of the financing of terrorism and the proliferation of weapons of mass destruction, or other relevant laws, requiring these to be periodically reviewed and kept up to date, by reviewing the policy and procedures, including practice

guidelines, operating methods, and practice manuals, to determine whether they remain consistent with applicable law, at least once a year, or immediately upon the Company becoming aware of a change in applicable law or government regulations.

Contact for Inquiries

For inquiries or requests for advice or guidance concerning the Anti-Money Laundering and Counter-Terrorism Financing Policy, contact may be made at: whistle-blower@proinside.co.th

Mr. Wisudhi Srisuphan

Chairman of the Board