

**Anti-Money Laundering and Counter-Terrorism and
Proliferation of Weapon of Mass Destruction Financing
Policy (AML/CTPF)**

1. Introduction

Ngernturbo Public Company Limited (“the Company”) is considered a professional under Section 16 (6) of the Anti-Money Laundering Act B.E. 2542 (1999 CE). The Company recognizes the importance of preparedness in terms of control and establishing operational regulations to know the customers who engage in transactions with the Company. The key principle of control is to create appropriate standards for verifying the information of both current and new customers to prevent the Company from being used as an intermediary for criminal activities such as illegal businesses, terrorism, fraud, etc., which could affect the Company in terms of its reputation and the stability of the overall institutional system. Therefore, the Company has established this Anti-Money Laundering and Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing (“AML/CTPF”) Policy, which has been endorsed and approved by the Company's senior management. This policy is considered a core policy of the organization and holds importance equivalent to the primary business operation policies. Consequently, all executives and employees involved in legal compliance must strictly adhere to this policy.

2. Objectives

The Company places great importance on complying with the Anti-Money Laundering Act and the laws related to the prevention and suppression of financial support for terrorism and the proliferation of weapons of mass destruction. Therefore, the Company has established this policy to:

- 1) Ensure that the Company’s business operations are consistent with and compliant with laws, regulations, and requirements of relevant authorities regarding the prevention and suppression of money laundering and counter-terrorism and proliferation of weapons of mass destruction financing.
- 2) Prevent the Company from being used as a tool or a channel for money laundering, terrorism financing, or the proliferation of weapons of mass destruction financing.

- 3) Enable the Company's executives and employees to conduct business correctly in accordance with the principles of the Anti-Money Laundering Act, B.E. 2542 (1999), including its amendments and related sub-regulations, while also serving as a guideline for standardized operational practices.
- 4) Define the roles and responsibilities of employees to ensure that operations comply with the Company's internal requirements and applicable laws.

3. Scope of Application

This policy applies to all directors, executives, and employees involved in compliance with the Anti-Money Laundering law and the law concerning the Prevention and Suppression of Financing of Terrorism and the Proliferation of Weapons of Mass Destruction. All relevant persons must strictly adhere to this policy.

4. Definitions

Definitions	Explanation
The Company	Ngernturbo Public Company Limited
Anti-Money Laundering Office (AMLO)	Anti-Money Laundering Office
Money Laundering (ML)	The process of converting money or property obtained from criminal activities or acquired unlawfully into money or property that appears to be legally obtained.
Terrorism and Proliferation of Weapon of Mass Destruction	The act of procuring, collecting, or managing financial or property transactions, or engaging in any actions to support terrorism, with

Definitions	Explanation
Financing (TPF)	the knowledge that the beneficiary of such financial or property transactions is a designated person, with the intent that the money or property be used to support any activities of the designated person, group of individuals, legal entity, or organization involved in terrorism.
Customer	An individual, legal entity, or person under a legal agreement who establishes a business relationship or conducts occasional transactions with the company.
Person under a legal agreement	An individual or legal entity, being one party, who legally agrees to possess, use, dispose of, or manage assets in any manner for the benefit of another individual or legal entity.
Ultimate Beneficial Owner	An individual who is the true owner or has control over the business relationship of a customer with the company, or the person on whose behalf the customer conducts transactions, including individuals who exercise control over a legal entity or a person under a legal agreement.
Designated person	An individual, group of individuals, legal entity, or organization listed under a resolution or announcement of the United Nations Security Council, designated as engaging in acts of terrorism or the proliferation of weapons of mass destruction, and whose names have been announced by the Office, or an individual, group

Definitions	Explanation
	of individuals, legal entity, or organization listed as designated by a court's judgment and order.
Politically exposed person	A person who holds or has held a significant position in Thailand or abroad, including heads of state or government, ministers, senior government officials, judges, members of independent organizations, prosecutors, or military officials; senior executives of state enterprises or other government agencies; individuals with significant roles in political parties; persons who hold or have held significant positions in international organizations; and those holding equivalent positions, as specified by the Secretary-General with the approval of the Committee.
Family Member	<ol style="list-style-type: none"> 1) Father, mother, child, adopted child, or adoptive parent of a politically exposed person. 2) Full siblings (sharing the same father and mother) or half-siblings (sharing the same father or the same mother) of a politically exposed person. 3) Spouse or person living together as husband and wife without formal marriage registration of a politically exposed person or of individuals under (1) or (2).
Close Associate	<ol style="list-style-type: none"> 1) A person who possesses or manages assets or other benefits of a politically exposed person.

Definitions	Explanation
	2) A person who has a close relationship arising from establishing or conducting a business relationship with a politically exposed person.
Senior Executive of the Company	A person with authority and responsibility for planning, directing, or controlling activities, including the management and administration of the company. Herein, this refers to the Chief Executive Officer of the company or a person delegated authority by such executive.
Transaction	Activities related to entering into legal acts, contracts, or any operations with others concerning finance, business, or property management, including continuous transactions arising from establishing a relationship and one-off transactions conducted by customers who engage in occasional transactions.
Business Relationship	A transaction between a customer, as one party, and the company, as the other party, with the objective of utilizing the company's financial, business, commercial, or professional services on a continuous basis or for an agreed period.
Occasional Transaction	A transaction between a customer, as one party, and the company, as the other party, with the objective of utilizing the company's financial, business, commercial, or professional services on a one-off basis without the intention of establishing a

Definitions	Explanation
	business relationship.
Risk	The risk associated with money laundering, terrorism financing, or the proliferation of weapons of mass destruction financing.
Reliable Source	A source that provides or compiles information in a reasonable, principled manner or with references, enabling the public or business groups to verify or access the information.
Suspicious Transaction Reporting (STR)	A transaction reasonably believed to be conducted to avoid compliance with the Anti-Money Laundering Act, or a transaction related to or potentially related to predicate offenses or terrorism financing. This includes transactions conducted once or multiple times and encompasses attempts to conduct such transactions.
Signature	The name of an individual written on a document or paper to certify or indicate that they are the author or creator of said document, or a fingerprint or mark used in place of a signature, including an electronic signature as per the law on electronic transactions.
Know Your Customer (KYC)	The process of obtaining customer information and verifying the authenticity and accuracy of the identification information, in accordance with the Prime Minister's Office Announcement on

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	the methods for customer identification by financial institutions and professionals under Section 16.
Customer Due Diligence (CDD)	A process established when initiating a business relationship with a customer whose transactions meet the legal threshold, involving identifying and verifying the customer's identity, determining the ultimate beneficial owner, and monitoring the customer's financial activities for any unusual behavior or reasonable grounds for suspicion. This is to prevent the company from being used as a channel for money laundering and/or terrorism financing.
Identification & Verification	The process of identifying and verifying that a customer legally exists and is indeed the person establishing a relationship or conducting transactions with the company.
Cash Transaction	An activity involving the receipt of cash between the customer and the company only, excluding transfers to the bank account of either party, with a value of five hundred thousand baht or more.
Suspicious Transaction	A transaction reasonably believed to be conducted to avoid compliance with the Anti-Money Laundering Act, B.E. 2542 (1999), or a transaction that may be related to predicate offenses or terrorism financing. This includes transactions conducted once or multiple times and encompasses attempts to conduct such

Definitions	Explanation
	transactions.
Enhanced Customer Due Diligence (EDD)	The highest level of scrutiny applied to verify facts about customers, particularly those in high-risk groups.
List Screening	The process of checking customer information against watchlists (Blacklist) through the LOS
Loan Origination System (LOS)	The company's core system is used for managing loans and various service-related transactions.
Risk Management System (RMS)	A system used for screening information or names of customers or individuals associated with watchlists.
Subsidiary Companies	A listed company in Thailand or abroad in which the company holds, directly or indirectly, more than fifty percent of the total voting rights.
Branch Office	A branch office of the company located overseas (excluding domestic branches, as they are considered part of the organization and must strictly comply with the laws and procedures of the head office).

Definitions	Explanation
Responsible Officer	An officer tasked with onboarding customers, verifying customer identity, and conducting customer due diligence.
Identification Document or Evidence	Physical documents or electronic information that can be used as evidence to verify identity, such as a national ID card, etc.

5. Roles, Duties, and Responsibilities of the Persons Involved

Related Persons	Roles, Authorities, Duties, and Responsibilities
Board of Directors of the Company	<ol style="list-style-type: none"> 1) Place importance on the prevention and suppression of money laundering, as well as the prevention and suppression of financial support for terrorism and the proliferation of weapons of mass destruction. Ensure strict compliance by employees with the laws, policies, regulations, orders, and operational guidelines of the company. 2) Support employees to have sufficient knowledge and understanding regarding 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, enabling them to effectively carry out customer onboarding processes, risk management, and due diligence on customers.

Related Persons	Roles, Authorities, Duties, and Responsibilities
Senior Executives	<ol style="list-style-type: none"> 1) Supervise and ensure that operations are conducted in accordance with the laws on the prevention and suppression of money laundering and the laws on the prevention and suppression of financial support for terrorism and the proliferation of weapons of mass destruction, including other relevant laws and regulations. 2) Approve policies on the prevention of money laundering, financial support for terrorism, and the proliferation of weapons of mass destruction. 3) Promote and ensure that employees of the company receive regular and consistent knowledge about money laundering.
Compliance Department	<ol style="list-style-type: none"> 1) Supervise the operations related to AML/CTPF of the company, as well as provide advice on the relevant laws, assess internal organizational risks, report transactions to the AMLO (Anti-Money Laundering Office), and serve as the contact and coordination point with the AMLO. 2) Prepare drafts or update AML/CTPF policies and other related practices, and announce or disseminate them to the relevant employees for their awareness. 3) Establish measures to regularly provide knowledge about money laundering and the procedures for conducting KYC/CDD to employees, such as organizing training sessions, among other methods. 4) Evaluate, review, and supervise the performance of relevant employees to ensure compliance with AML/CTPF policies and KYC/CDD

Related Persons	Roles, Authorities, Duties, and Responsibilities
	procedures.
Employees	<ol style="list-style-type: none"> 1) Give priority to and strictly comply with the laws on the prevention and suppression of money laundering and the laws on countering financial support for terrorism and the proliferation of weapons of mass destruction, as well as with this policy, the company's regulations, directives, operating manuals, and all other relevant laws and regulatory requirements. 2) Be aware and accord importance to transactions that are reasonably suspicious, and report those transactions in accordance with the policy on the prevention of money laundering, the financing of terrorism, and the proliferation of weapons of mass destruction.

6. Customer Onboarding

To prevent or mitigate risks and control the company from being used as a tool by criminals or processes related to money laundering and terrorist organizations, which could damage the company's reputation due to the actions of such groups, and to ensure that the company conducts financial transactions efficiently under acceptable risk levels and in compliance with legal requirements, the company establishes the following customer onboarding policy:

- 6.1. In establishing or refusing to establish a business relationship with a customer, the company will require the customer to identify, verify, and authenticate their identity in accordance with relevant laws and regulations. The company shall also provide guidelines to ensure that personnel are able to perform such procedures as required by law.
- 6.2. The Company shall classify each customer's risk level by considering information such as occupation, type of business, place of residence, transactions conducted with the Company, source of funds, or designation by the Anti-Money Laundering Office (AMLO) as a high-risk customer, who must therefore be subject to close monitoring.
- 6.3. Before entering into any relationship or processing any transaction, the Company shall screen the customer's name—and the names of any designated persons, including individuals or groups suspected of terrorist involvement—against all sanctions and watch lists issued by the relevant authorities.
- 6.4. Employees may process a transaction only after they have completed customer due diligence and fully verified the customer's information.
- 6.5. The Company shall not conduct transactions with individuals or entities whose names appear on any prohibited list issued by a government agency or by the Company itself.
- 6.6. The Company shall not allow transactions with persons using aliases, or with persons linked to money laundering or predicate offenses.

6.7. The onboarding of any high-risk customer must be approved by senior management or a duly authorized person. If a customer appears on a Sanction List, the Company must refuse the transaction and submit a report to the AMLO in the format, manner, and timeframe prescribed by law.

7. Assessment, Management, and Mitigation of Internal Risk

7.1. The Company shall conduct an internal assessment and management of the risks of money laundering, financing of terrorism, and proliferation of weapons of mass destruction, using the risk factors prescribed by law. This assessment must be reviewed and kept up to date every two years—or sooner if there is a material change in the Company's risk profile.

7.2. The Company requires that the risk of every customer be assessed in accordance with the criteria set forth in applicable legislation.

7.3. The Company's risk-management process spans the entire customer lifecycle, beginning with the identification and verification of the customer, the assignment of an individual risk rating, the ongoing monitoring of transactional activity commensurate with the customer's risk level, the periodic review of customer-identification data in line with that risk level, the reassessment of risk, and, where necessary, the termination of the business relationship.

8. Transaction Reporting

8.1. The Company shall report transactions in the format, criteria, and manner prescribed by law.

8.2. The Company defines the characteristics of suspicious transactions at least in accordance with the guidelines issued by the Anti-Money Laundering Office (AMLO).

8.3. In the event that an employee finds that a customer or transaction exhibits suspicious behavior, the Company requires the employee to report to their supervisor and coordinate with the Compliance department to report the suspicious transaction according to the prescribed form and timeframe stipulated by law.

8.4. The Company does not disclose to customers or unrelated external persons that it has reported the suspicious transaction to the Anti-Money Laundering Office.

9. Internal Control Measures

The company mandates oversight of operations in accordance with AML/CTPF laws, ensuring continuous AML/CTPF training for employees and establishing an independent internal audit mechanism. Audits are conducted at least once a year or whenever there are significant changes to the law.

10. Measures for Information Sharing Between Companies

The company establishes measures for sharing information between the company and subsidiaries, prohibiting directors, employees, agents, or any persons of the company or subsidiaries from disclosing information, facts, or engaging in any actions that may allow customers or external parties to learn about customer due diligence, transaction reporting, or the submission of any information to the AMLO, except as required by law or court order.

11. Measures for Data and Evidence Retention

The company mandates the retention of detailed information regarding customer identification, customer due diligence, transactions, transaction-related records, and AMLO reporting forms for the duration specified by law.