

**MINOR INTERNATIONAL PUBLIC COMPANY LIMITED**

**Risk Management Policy on Customer's Money Laundering and Customer Acceptance Policy**

The company has the responsibility and ethics to determine the policy and practices for risk management on customer's money laundering and the Customer Acceptance Policy as the company is running a business that involves foreign exchange transactions from customers who are using services provided by the company. The company is committed to protecting the organization from being a money laundering source and supporting terrorism by strictly complying with the law on anti-money laundering as well as related laws and practices specified by the Anti-Money Laundering Office.

The company has set out a policy and various measures to ensure that the above policy will be fulfilled such as the Customer Acceptance Policy, risk management measures, practices from examining the facts about customers, and to ensure that these measures and practices are followed by everyone in the organization in an efficient manner. The guidelines for examining the facts about customers are as follows:

**1. Objectives**

The company has determined a policy that is approved by the company's board of directors with the commitment to anti-money laundering and combating the financing of terrorism. The company has also the responsibility and ethics to comply with the law on anti-money laundering and follow the international standards on anti-money laundering and combating the financing of terrorism.

The company has the customer acceptance policy, the risk management that may involve money laundering by customers, and the principles of practices on the examination procedure for the facts about customers which is the main procedure in examining and preventing the company from being a money laundering source or providing financial support to terrorism that is in line with the specified laws. In this regard, the company will be responsible for managing the organization and personnel so as to ensure of the compliance to such a policy in a continually efficient manner.

**2. Responsibility to comply with the company's policy**

2.1 The company's authorized executive recognizes the importance of anti-money laundering and combating the financing of terrorism by ensuring that every employee must strictly follow the policy, regulations and practical guidelines provided by the Anti-Money Laundering Office.

2.2 The company has assigned the authorized executive responsible for the compliance of the law on anti-money laundering to coordinate with the Anti-Money Laundering Office.

2.3 The authorized executive of the company has determined the risk control measures against potential money laundering activities and financial support to terrorism that may arise from the foreign exchange services provided by the company.

2.4 The authorized executive of the company has provided support and encouraged employees to acquire knowledge and understanding on anti-money laundering and combating the financing of terrorism in an adequate manner, and to enable the efficient compliance with the law on anti-money laundering.

2.5 The authorized executive of the company has set out orders, regulations and work manuals that are consistent with the policy on anti-money laundering and combating the financing of terrorism determined by the Anti-Money Laundering Office. However, in case that the regulations and guidelines stipulated under this law or other related laws that are not consistent with the practices, the company has followed the more strictly stipulated laws.

### **3. Customer Acceptance Policy**

The company has determined the procedures in establishing or refusing business relationships or making transactions with regular and irregular customers by acquiring customer's information so that they can be identified accurately and verified against the name list with legally specified risks in order to prevent the company from being used as a tool or medium in money laundering or financial support to terrorism.

### **4. Customer Verification and Identification**

The company has determined the types of regular and irregular customers so as to obtain information and identification evidence as specified by the law, and the company has verified customer's information so as to identify the customer before implementing any further risk management procedures as specified by the law.

### **5. Management of risks that may involve money laundering by customers**

The company has determined measures in considering risks that may involve money laundering by customers as specified by the law and may be consistent with the Anti-Money Laundering (AML) international standards so as to ensure that such measures can prevent or reduce the risk of using the company as a channel or medium for money laundering and financial support to terrorism.

5.1 The company has determined the risk assessment regarding money laundering and financial support to terrorism so as to realize the level of needs for collecting data and identification evidence appropriately according to all levels of risks involved with money laundering and financial support to terrorism.

5.2 The company has provided more appropriate and rigorous measures in examining and verifying the facts about a customer who has a high risk of committing money laundering.

5.3 The company has determined the risk management procedure and review of information and the facts used in managing customer risks on a regular basis, particularly for those customers with high risks of committing money laundering. If the facts for risks of money laundering or financial support to terrorism are found, the company must examine so as to decline the relationship with the customers. However, if the relationship is to be established or maintained, the company must report as suspicious transactions to the Anti-Money Laundering Office immediately.

## **6. Personnel Development**

In the annual work plan, the company provides employee trainings concerning to foreign exchange transactions so that employees are aware of rules, regulations and information updated from the Anti-Money Laundering Office, and can apply such knowledge in an appropriate and practical manner.

## **7. Use of information technology in examining the facts about customers**

The company provides access to various databases to be used in examining the facts about customers as specified by the law, for example, information on individuals committing predicate offences or money laundering, a list of individuals with a political status associated with some countries, a list of groups of individuals who have been concluded or announced under the resolution of the United Nations Security Council to have committed terrorism, and so on, by using information technology designed for anti-money laundering activities efficiently.

## **8. Examination of the facts about customers**

The company has set up a procedure for examining the facts about customers of all types until customers terminate the relationships. Also, customer information will be checked and updated on a regular basis such as reviews of customer information and requests for important supplementary documents. Customer information will be cross-checked with various customer databases while suspicious transactions will be monitored by an efficient and timely system with clear working procedures. Risk management and examination of the facts about customers will be reviewed constantly for the whole period of the relationship with customers. Such information will be kept and maintained as stipulated by the law.

## **9. Report of suspicious transactions found when examining the facts about customers**

9.1 The company has determined a system for reporting suspicious transactions to the Anti-Money Laundering Office under the conditions and requirements of the law on anti-money laundering and related regulations.

9.2 The company has developed a system or method to ensure the reporting of suspicious transactions will be in time and enable the finding of traces of unusual or suspicious transactions.

9.3 The company has determined the features of suspicious transactions at least according to the guidelines specified by the Anti-Money Laundering Office such as foreign exchange in cash of more than 500,000 Baht or other suspicious items.

9.4 The company is not obliged to inform customers that their suspicious transactions are reported to the Anti-Money Laundering Office.

## **10. Data Storage**

10.1 The company stores documented data and identification evidence or other documented evidence of customers that are used in examining the facts about customers as stipulated by the law.

10.2 The company stores documented data and evidence regarding transaction reports, risk assessment and analyses of customer information that relate to the examination process as stipulated by the law, for 5 years from the date of making transactions.

10.3 Should the Anti-Money Laundering Office request for data examination, the company should ensure the availability of such data for examination at all times. The duration of data collection and storage must be consistent with the related policies, regulations, practices, and legal requirements.

## **11. Others**

The same policy and practices are applicable to the entities in the Group as defined by the Company.