

Thaivivat Insurance PCL.

Anti-Money Laundering and Combating the Financing of Terrorism Policy

With reference to Thaivivat Insurance PCL. is an insurance company, classified in the group of financial institute under the Anti-Money Laundering Act. Therefore, in order to be in accordance with the law and in order to prevent the Company becoming a tool of those money laundering person and financing person to terrorism which may affect to the Company's reputation and cause damage to the Company, the Company focuses to combat money laundering and the financing of terrorism and has established necessary measures for encouraging the said policy with objectives, guideline on determination of policies and measures as follows:

Objectives

1. In order to be a practice guideline on anti-money laundering and combating the financing of terrorism in accordance with the Anti-Money Laundering Act including provisions of relevant laws and rules.
2. In order that concerning persons and the Company's employees shall have correct and corresponding knowledge and understanding on performance in accordance with the scope and provisions of the anti-money laundering and combating the financing of terrorism.
3. In order to be as guidelines for process management and performance procedure in the organization on receiving customers, customers fact-finding and preventing and managing risks which may arise from the money laundering or financing terrorism processes conducted through the Company's business operation.

Duties and Responsibilities in Compliance with the policy

1. The Board of Directors has the duty to consider for approving practices of the anti-money laundering and combating the financing of terrorism policy.
2. Executive board shall have the duty as follows:
 - 2.1 Prepare and present policies and practices to be in correspondence with the provisions of the laws on anti-money laundering and combating the financing of terrorism.
 - 2.2 Specify controlling measures and manage risks on laundering money and financing terrorism which may arise from the transaction channels, products or services of the Company.
 - 2.3 Specify internal orders, rules and practices corresponding with the policy on anti-money laundering and combating the financing of terrorism in accordance with guidelines specified by the Anti-Money Laundering Office or any other relevant laws.
 - 2.4 Specify the executives who have the power and duty to use its discretion and approve work operation procedures in both regular case and case needed to specially screened in the procedure of receiving customers, evaluating customers' risks and inspecting for customers' fact-finding.

- 2.5 Monitor and inspect the officers' work performance to be in accordance with orders, rules, and practices under the policy on the anti-money laundering and combating the financing of terrorism strictly.
- 2.6 Support and encourage the officers to obtain sufficiently knowledge and understanding on anti-money laundering and combating the financing of terrorism until they can perform the work in process of receiving customers, risk management, and inspection for fact-finding of customers proficiently.
3. Employees in all levels have the duty to comply with the Company's specified orders, rules and practices strictly under the policy on anti-money laundering and combating the financing of terrorism.

Part 1 Core policy on the anti-money laundering and combating the financing of terrorism

The Company has specified the policy on anti-money laundering and combating the financing of terrorism as a core policy of the organization and it is important as same as the core business operation policies by aiming to combat money laundering and the financing of terrorism. In order to make it clearly tangible, to comply with the laws on anti-money laundering and combating the financing of terrorism, the Company has specified policies and measures on anti-money laundering and combating the financing of terrorism as follows:

- 1.1 Prepare policies and practices on anti-money laundering and combating the financing of terrorism of the organization in writing to present the Board of Directors for approval.
- 1.2 Specify internal practice to support the Company's policies.
- 1.3 Monitor and manage performance to be proficient in accordance with the specified practice and the shall be clearly responsible person on monitoring the performance under the laws on anti-money laundering and combating the financing of terrorism, following up the performance as well as to be a center of contact and coordination with the Anti-Money Laundering Office.
- 1.4 Provide trainings to give knowledge and understanding in the policies and practices relating to receiving customers, risk management, and practice of inspection procedures for customer fact-finding until they can perform the work completely and accurately as a standard of the development of employees in all levels in the Company.

In essence, the specified policies shall be a strict practice of the Company for both head office and branches all over the country.

Part 2 Secondary policy or substance of performance relating to receiving customers deemed to be a part of operation in accordance with the core policy, subject: anti-money laundering (and combating the financing of terrorism) shall be consisted of:

1. Receiving customers

Initially, receiving customers or occasionally transaction makers, the Company shall provide an identification in order to identify them and inspect proofs of the customers or occasionally transaction makers' identification with the following procedures:

1.1 Procuring the customers to identify them

Upon a customer wishes to build a relationship or an occasionally transaction maker wishes to make the first transaction, the Company shall arrange the customer to inform his/her profile in accordance with the announcement of the Office of the Prime Minister, Subject: Method of identification of financial institute customers and self-employed persons under Section 16.

1.2 Identification of customers

The Company must inspect customers' or occasionally transaction makers' information and identification documents by assigning responsible officers who contact with customers, agents, brokers to inspect at appropriate discretion with this procedures and for objectives:

- (1) To know that such customer or occasionally transaction maker is a real person, juristic person or agreeing person under the law.
- (2) To know that the identification information acquired is sufficient for carrying on the procedure of the risk management and inspecting to know the customer's fact.

1.3 Proof of customer's fact-finding

The Company shall inspect the accurateness of customers' or occasionally transaction makers' information and identification evidence with the list of "specified persons" which is the information of persons, groups of persons, juristic persons or organizations as resolved or announced by UN Security Council that he/she is a person with terrorism act or a person ordered by the court to be a person with terrorism act.

1.4 Approval of receiving customers or refuse of receiving customers

The Company shall refuse to build business relationship or transactions with customers if either of the following fact is appeared:

1. A customer has concealed his/her name, surname or real name and surname or has used incognito or pseudonym for making a transaction.
2. A customer has notified false or showing false evidence in substantial.
3. Giving information and identification evidence of a customer is not in accordance with the announcement of the Office of the Prime Minister, Subject: Method of identification of financial institute customers and self-employed persons under Section 16.
4. It cannot inspect information and identification evidence.
5. It is found that a customer, a real beneficiary of a customer or concerning person is a member of the group of persons as resolved or announced by UN Security Council that it is a group of person with terrorism act which Thai government has announced to rectify the said resolution or announcement.
6. Receiving such customers shall make the Company having laundering money and financing terrorism risks.

The Company shall consider the report as doubtful transactions and present them to the Anti-Money Laundering Office if the refusal is caused by Clause 1, Clause 2, and Clause 5.

2. Inspection for customer fact-finding

The Company has specified the procedure on inspection of transactions in order to know that each customer has risks of laundering money and financing terrorism and shall bring such acquired information to perform in accordance with appropriate risk management measures suitable for each customer. The Company shall operate the transaction inspection until cease of relationship.

3. Risk management on the laundering money and financing terrorism

The Company has specified risk management on the laundering money and financing terrorism in order to know that the Company has risk opportunities to be a source of laundering money and financing terrorism and bring such result to manage these risks as factors to manage the risks for customers as follows:

3.1 Risk management on the laundering money and financing terrorism within the organization

The Company considers determining types of products/services/distributing channel/transaction channel for managing risks on the laundering money and financing terrorism together with other risk factors of customers in order to consider risks for each customer.

3.2 Risk management on the laundering money and financing terrorism for customers

The Company considers specifying that results of customer inspection and database, country or area where the customer residing, source of income, occupation, personship with political status in overseas shall specify risk levels of laundering money of the customers. In this regard, the Company has specified risks of customers at low, moderate and high levels in accordance with the criteria specified by law.

3.3 Risk management of customers continuously

The Company shall provide the risk management on the laundering money and financing terrorism continuously, especially, the risk management for customers shall be prepared from the procedure of approving to receive customers until cease of the relationship.

4. Report of doubtful transactions

The Company has specified measures on reporting doubtful transactions to be in accordance with the provisions of laws. Upon it found that there are doubtful transactions, such transactions shall be inspected according to the specified procedure in order to present it to the executives for consideration and approval that they are doubtful transactions before delivery to the Anti-Money Laundering Office.

5. Using information technology for inspecting customers in order to prevent from laundering money and financing terrorism

The Company has the duty to provide an access of database used for inspecting in order to know customers as specified by laws such as information of predicate offenders or offenders of money laundering offence, list of persons holding political status in overseas, list of group of persons having resolutions or announcements under UN Security Council's resolution specifying that they are persons with terrorism act by using information technology in order to anti-laundering proficiently.

6. Confidentiality

The Company has the duty to keep information, documents and evidence of identification or any other documents of customers, insurance agents, insurance brokers or partners and substitutes used for fact-finding relating to the customers as specified by laws.

7. Employee training

In order that employees shall perform the duty completely and accurately in accordance with the law on anti-money laundering and combating the financing of terrorism, the Company has set its guidelines to develop the employees continuously as follows:

1 Employees in all levels shall be provided trainings to strengthen their knowledge and understanding regarding laws, rules, policies, practice on part of the anti-money laundering and combating the financing of terrorism.

2 Direct operating employees shall be provided trainings to strengthen their performance skills until they can correspondingly perform without error and in order to prevent damage to the Company.

8. Internal audit regarding operating systems

To ensure that the internal audit system of the Company regarding the performance on the anti-money laundering and combating the financing of terrorism proficiently, the Company has drawn practice guidelines as follows:

1. Check the operating officers' knowledge, understanding of laws, rules, policies and practices on the anti-money laundering and combating the financing of terrorism.
2. Evaluate the officers' work performance whether they are in accordance with specified target.
3. Randomly review the performance to be in compliance with the policies and practices in order to be information to the concerning executives for developing the proficiency of responsible officers' work performance.
4. Evaluate the Company's risks against non-compliance with the laws, rules, policies and practices or upon it is found that there is any error from the officers' work performance or working procedures.
5. Evaluate the officers' knowledge and understanding of laws, rules, and policies and practice every time the laws or rules of the Anti-Money Laundering Office or relevant regulatory organizations.

9. Development and Improvement of Policies

In order to comply with the laws on the anti-money laundering and combating the financing of terrorism correctly, the Company shall follow up changes of laws, announcements of the Anti-Money Laundering Office consistently and shall bring changed criteria to develop and improve the Company's policies in order that the Company's performance shall be in correspondence with such law the most.

The Company shall specify the period of time to develop and improve the policies on anti-money laundering to be completed after the change of relevant laws within 6 months. In the event where main laws have not been changed, the Company shall consider to develop and improve the policies every year.



(Mr. Jiraphant Asvatanakul)

President and Chief Executive Officer