

(Translation)

**The Navakij Insurance Public Company Limited (the "Company")**

**The Anti-Money Laundering and Combating the Financing of Terrorism Policy  
(AML/CFT Policy)**

The Company has an ethical responsibility to define policies and guidelines to serve the anti-money laundering and combating the financing of terrorism policy, adamantly ensures to prevent money laundering and financing of terrorism and strictly to comply with the regulations and relevant laws issued by the Anti-Money Laundering Office.

The Company had defined other policies and guidelines to serve the policy mentioned above which include (1) customer acceptance (2) risk management system (3) know your customer/customer due diligence process (or KYC/CDD) and efficiently observed by all employees in the organization as following procedures:

**1. Objectives**

The policy mentioned in the above must be approved by the Company's board of directors, adamantly ensures that the Company operates under the principals of the anti-money laundering and combating the financing of terrorism and are responsible to comply with anti-money laundering legislations, including ministerial regulations, notifications, rules regulations and other subsidiary legislations.

The Company has the customer acceptance policy, risk management maybe concern the customer money laundering and providing the principals of the customer due diligence process consistent with specified regulations.

Therefore the Company will always continue to monitor that all employee implement such policy efficiently.

**2. Duties and Responsibilities to apply the Company existing policy**

2.1 The Company's authorized management has realized on the importance of anti-money laundering and combating the financing of terrorism by providing relevant policies and guidelines as specified by the Anti-Money Laundering Office to all employees and to strictly implement.

2.2 The Company had designated the management as an anti-money laundering office to be responsible for coordinating with the Anti-Money Laundering Office.

2.3 The Company's authorized management had defined the risk management system to prevent money laundering and financing of terrorism that maybe occur from the use of products or services of the Company.

2.4 The Company's authorized management had arranged for on-going training for all employees to ensure compliance with the anti-money laundering legislations efficiently.

2.5 The Company's authorized management had defined notification, the internal policies and procedures consistent with the anti-money laundering and combating the financing of terrorism policy as guidelines specified by the Anti-Money Laundering Office. In case of the rules and regulations under this law or others inconsistent with the Company's guidelines, the Company duly compliance with those laws.

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

The Company had defined establishment of a business relationship or temporarily restriction/ suspension of services, termination of services or other types of actions with the customers and relevant persons both inside and outside the country; in case where a customer is found or where the know-your client/ customer due diligence process can be materially performed by the Company to prevent involving as tool or intermediate to money laundering or combating the financing of terrorism.

### **4. Customer Due Diligence/ Client Identification**

The Company had specified the types of customer and occasional customer including his ultimate beneficial owner and face-to-face meeting. In this regard, all information requested from clients must be up-to-date at the time the KYC/CDD process before continuing on the process of risk management as specified by law.

### **5. Risk Management System**

The Company had in place written policies and procedures concerning risk management and be consistent with AML/CFT international standards to prevent or reduce risk from the use of the Company as intermediate in money laundering and financing of terrorism.

5.1 The Company had conducted the KYC/CDD process, classify and apply the scope and intensity of the procedures for each client in accordance with the client's level of risk associated with money laundering (risk-sensitive basis).

5.2 The Company provided an appropriate and enhanced the KYC/CDD in the high risk.

5.3 The Company had the risk management and frequency in reviewing client's existing records especially on the high level of client's risk. If it is found that, the Company must review to suspension of services or report suspicious transactions if require to establish of a business relationship.

### **6. The Use of Information Technology to apply the KYC/CDD**

The Company had established and maintain databases and put in place procedures so as to gain access to external database to facilitate the KYC/CDD process such as list of name of persons who have committed predicate offences or money laundering offences, list of name of politically exposed persons in oversea, list of name of commission which was stipulated as a group of conspirators by the security council.

### **7. Customer Due Diligence Process**

The Company had conducted the KYC/CDD process throughout the course of the relationship with clients (on-going KYC/CDD), established a review process to ensure that the client's record previously obtained remain accurate, complete, and up- to-date, conducted the system and procedures of a report on suspicious transactions efficiently. Maintain review the risk management and the KYC/CDD until the account is closed including record such documents as specified by law.

## **8. Reporting of Suspicious Transactions**

8.1 The Company had defined system for reporting of suspicious transactions to the Anti-Money Laundering Office under conditions and regulations of anti-money laundering legislations and related rules;

8.2 The Company had in place monitoring systems to promptly identify or detect suspicious transactions;

8.3 The Company had determined characteristics and natures of transactions to be regards as suspicious transactions as guidelines of the Anti-Money Laundering Office at least;

8.4 The Company undisclosed such report to the customers.

## **9. Record Keeping and Retention of Records**

9.1 The Company shall maintain and record all documents and information and opinions made under the KYC/CDD process as specified by law.

9.2 The Company shall record documents as well as those in relation to suspicious transactions, risk evaluation and analyzing of the customer information regarding the KYC/CDD process as specified by law.

9.3 Such documents shall be stored in the manner that enables prompt access for review by the Anti-Money Laundering Office when requested. The period should be consistent with related policies, procedures and regulations.

This policy shall come into force as from 21 August 2012.

-Signature-  
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(Mr. Suchin Wanglee)

Chairman of the Board