



**Anti-Money Laundering and Counter - Terrorism
and Proliferation of Weapons of Mass
Destruction Financing Policy**

1. Why it matters

CP Axtra Public Company Limited (“The Company”) operates retail and wholesale business with the significant purpose to continuously develop and enhance its service offerings to meet at the utmost needs and expectations of all Customers in order that the Customers will receive the great benefit and satisfactory. To operate the Company’s business, the Company has and adheres the policies to be in compliance with relevant laws and regulations concerning the Company’s business operation, this includes the Anti-Money Laundering Act, B.E. 2542 (“**Anti-Money Laundering Act**”) and the Counter-Terrorism and Proliferation of Weapons of Mass Destruction Financing Act, B.E. 2559 (“**Counter - Terrorism and Proliferation of Weapons of Mass Destruction Financing Act**”) as well.

2. Purpose

To mitigate the Company’s risk, it shall comply with the laws on Anti-Money Laundering and Counter - Terrorism and Proliferation of Weapons of Mass Destruction Financing as the Company might be misused to activities related to financial crimes. The Company therefore has issued this Anti-Money Laundering and Counter-Terrorism and Proliferation of Weapons of Mass Destruction Financing Policy (“**Policy**”) for all employees to strictly adhere and comply with.

3. Scope

The Company also operates its business concerning electronic payment services, such as, the bill payment services which is required to comply with the Anti-Money Laundering Act and the Counter - Terrorism and Proliferation of Weapons of Mass Destruction Financing Act at the present as well. The Company has this Policy to comply with the relevant laws, ministerial regulations, notifications, and guidelines of the Anti-Laundering Commission and the related Anti-Money Laundering Office (“**AMLO**”). This Policy is used as an implementing guideline framework for relevant employees in compliance with the laws. Thus, the employees shall study this Policy in conjunction with Anti-Money Laundering and Counter-Terrorism and Proliferation of Weapons of Mass Destruction Financing manual which specifies the comprehensive guidelines in details.

4. Definitions

In this Policy,

- “**Money Laundering**” means the process by which criminals attempt to hide or conceal the true origin and ownership of the proceeds of their criminal activities by converting those proceeds to the financial system as if they legitimately gained for their source of income.
- “**Terrorism and Proliferation of Weapons of Mass Destruction Financing**” means a procurement or a fundraising both intentionally and illegally (either direct or indirect ways). The main objective is to apply or to be aware to apply or use it for supporting Terrorism or Proliferation of Weapons of

Mass Destruction Financing. Such offence is considered as a global problematic issue which effects to the security and the effectiveness of financial system, undermine economic development and social sabotage.

- **“Counterparty”** means
 - 1) With respect to a Bill Payment Transaction, a business operator who issues an invoice (Billers) with whom the Company agrees to act as an agent for the receipt of payment from the Customers or online Customers; or
 - 2) With respect to a Banking Agent Transaction, a commercial bank or a bank established by the specific law; and shall also include any person who will become 1) or 2) (as the case may be.)
- **“Transaction”** means
 - 1) With respect to the Bill Payment Transaction, the payment made by the Customers, online Customers or Member Customers, for the purpose of utility payment, credit card payment or other payments, at the Company’s counter service or through the Company’s online system, in which the Company acts as payment agent for the Counterparty; or
 - 2) With respect to the Banking Agent Transaction, the deposit, withdrawal or transfer of the fund made by Customers and/or Member Customers at the Company’s counter service method, in which the Company acts as the agent for the Counterparty which is a bank for taking deposit, withdrawal or transfer of the fund made by those Customers and/or Member Customers.
- **“Designated person”** means a natural person, a group of persons, a juristic person or the listed organisation according to the resolution or the notification of the United Nations Security Council which designated criteria of the persons whose actions are the Terrorism and Proliferation of Weapons of Mass Destruction Financing as well as the AMLO’s announcement of such listed names or a natural person, a group of persons, a juristic person or an organisation listed as considered and adjudicated by the court to become persons as listed under the laws related to the Counter - Terrorism and Proliferation of Weapons of Mass Destruction Financing.
- **“Customers”** means a walk-in natural person or a juristic person who makes Transaction at store occasionally, including a natural person or a juristic person who establishes business relationship by registering or opening customer account with the Company (if any).
- **“Business relationship”** means a relationship establishment between a party of a natural person or a juristic person and another party of the Company. The objective is to continue finances, business or trade services or during the agreed period e.g. accounts opening or member registration, an opening of accounts or customers’ online registration, an agent appointing contract between the Company and the Billers (if any).

5. Policy and measurements

The Company issues the proper Policy which is in compliance with the relevant laws, including the Anti-Money Laundering Act and the Counter-Terrorism and Proliferation of Weapons of Mass Destruction Financing Act. The Company shall not allow anyone to use the Company's products and services for a purpose of money laundering or any support to the terrorism and proliferation of weapons of mass destruction financing.

To enable the Company to comply with its Policy and aforementioned laws, the Company shall establish the processes for Know Your Customer (KYC), Customer Due Diligence (CDD), risk management, transaction reporting, document retention and other proper processes to ensure the Company acts in compliance with the laws, with details as follows

1. The Company will regulate an approval process for establishing the business relationship or a rejection process of the business relationship as well as implementing rules regarding the transaction with Customers. The Company shall establish rules and regulations for conducting KYC, CDD and shall verify Customers and Billers against the list of Designated Person as set forth by the laws.
2. The Company will define the rules and regulations on risk management of the AML and CTF for Customers and Billers. The Company will consider risk factors which should not be less than requirement of the laws. The Company will also conduct the risk management at all time of having the business relationship or no longer having transaction with such Customers or Billers.
3. The Company will set forth the implementing rules on an internal data usage between the Company, its branches and other affiliates within the Group (if any) for conducting CDD process and the risk management on AML and CTF according to the guidelines under the laws.
4. The Company will prepare a handbook on risk management implementation according to item no. (2) which consists of an assessment and management of risk within the Company, the assessment and management of the risks of all Customers and Billers, risk management for monitoring and reporting suspicious transactions and risk assessment which may arise from the development of new products, including new business conduct as well as new mechanisms for service delivery or the use of new or emerging technology for both new and existing products and services as prescribed by the laws.
5. The Company will retain data for conducting KYC and CDD as prescribed by the laws.
6. The Company will have the AML and CTF handbook for employees to study and strictly comply with. The Company will apply the handbook for an employment process and a training for employees which will regularly conduct including prior to commencement of work to ensure that the relevant employees correctly understand the laws, rules and implementing rule and to achieve goals in compliance with this Policy.
7. The Company will conduct internal audit to ensure compliance with the Company's Policy and internal audit function shall have knowledge of AML and CTF for a regular audit of an operating system and

legal compliance, particularly on AML and CTF, for all personnel and electronics operating system. Such internal audit shall be independent and non-interference.

6. Others

This Policy may be amended from time to time to reflect the changes in the laws, ministerial regulations, rules, notifications or other guidelines issued by the Anti-Money Laundering Office (AMLO) or the Company's policy.

This Policy will be reviewed and updated regularly to comply with the products, services or any new services channels, particularly, technology usage or electronic network.

7. Who to contact

If you have any questions about this policy, please contact Legal Department.