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


JMT Network Services Public Company Limited places great importance on anti-money laundering and Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing as a key agenda of the organization, in order to comply with the principles of good corporate governance in accordance with good governance principles.

The company has therefore established this Anti-Money Laundering and Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing policy to serve as guidelines for employees at all levels, from the Board of Directors, executives and employees, to have a consistent direction in operations without contradicting the company's policies.

Therefore, the company hereby announces the enforcement of this “Anti-Money Laundering and Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing Policy” for the Board of Directors, executives and employees at all levels in subsidiaries, associated companies, business representatives and business partners to acknowledge and strictly comply with.


Scope of Enforcement

The Anti-Money Laundering and Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing Policy is enforced on all departments that directly or indirectly operate with JMT Network Services Public Company Limited, covering subsidiaries and associated companies, business representatives, and business partners, from the Board of Directors, executives and employees at all levels, in order to serve as strict operational guidelines to be jointly implemented.

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	Document No. : PD-IR-011	Revision No. REV00
	Effective Date :December 8, 2023	หน้าที่ :3/8

Definitions

Money Laundering	Refers to the act of transferring money obtained from illegal activities by changing the source of the money, by investing the money further in legal businesses, or using the illicit money obtained in any way to make it appear legitimate.
Terrorism	Refers to violent behavior intended to instill fear in the victim. It is an act of terrorism under the Criminal Code or an offense under laws that fall within the scope of international conventions and protocols on terrorism to which Thailand is a party or has endorsed, regardless of whether the offense was committed within or outside the Kingdom.
Weapons of Mass Destruction	Refers to dangerous weapons with widespread destructive capabilities against <u>humans, animals, plants</u> , building structures and locations, and may cause massive damage to the global environment. They are classified into several types including <u>nuclear weapons, biological weapons, chemical weapons</u> , as well as <u>radiological weapons</u> .
Designated Persons	Refers to individuals, groups of persons, legal entities or organizations listed under resolutions or announcements of the United Nations Security Council as those who have committed acts of terrorism or proliferation of weapons of mass destruction, and announced as such by the Anti-Money Laundering Office (AMLO), or individuals, groups of persons, legal entities or organizations listed that the court has considered and ordered to be designated persons under policies to combat money laundering and financing of terrorism and proliferation of weapons of mass destruction.
Know Your Customer (KYC)	Refers to the process of identity verification to get to know customers whose identities can be correctly identified and verified, in order to confirm the customer's identity, prevent fraud or falsification of information in financial transactions, as well as prevent money laundering, ensure data owner safety, and prevent identity theft.
Customer Due Diligence (CDD)	Refers to inspection to ascertain facts about the customer, to understand the purpose, business relationship and ongoing transactions.

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	Document No. : PD-IR-011	Revision No. REV00
	Effective Date :December 8, 2023	หน้าที :4/8


Responsibilities for Policy Compliance

1. Management must issue orders, regulations and operational manuals that are in line with the Anti-Money Laundering, Combating the Financing of Terrorism and Proliferation of Weapons of Mass Destruction Policy, in accordance with the guidelines set by the Anti-Money Laundering Office (AMLO) or other relevant laws.
2. Management must establish control measures and manage risks related to anti-money laundering, combating the financing of terrorism and proliferation of weapons of mass destruction that may arise from the use of transaction channels, products, and services of the company.
3. Management must approve the enforcement and ensure the regular review of the Anti-Money Laundering, Combating the Financing of Terrorism and Proliferation of Weapons of Mass Destruction Policy to keep the rules and regulations up to date with amendments announced by the Anti-Money Laundering Office (AMLO).
4. Management must consider appointing a department or company representative to coordinate with the Anti-Money Laundering Office (AMLO).
5. The company must have measures to vet applicant qualifications before hiring as employees and while being employed by the company, to ensure that applicants or employees are not designated persons under the law on anti-money laundering and combating the financing of terrorism and proliferation of weapons of mass destruction. In cases where the applicant has previously held the position of AMLO Secretary, they must have vacated that position for at least 2 years.
6. The company promotes knowledge and understanding of anti-money laundering, combating the financing of terrorism and proliferation of weapons of mass destruction to employees at all levels on a regular basis.
7. The company continuously manages risks both within the organization and to customers in accordance with operational processes and procedures, from the pre-relationship stage with customers until the termination of the customer relationship.

Customer Acceptance

The company has principles for accepting customers before starting a business relationship together, in order to comply strictly with the procedures and legal requirements within the following operational scope:


1. Require customers to identify themselves (Know Your Customer: KYC) to get to know the customers who want to identify themselves when requesting to do transactions for the first time, both as individuals and legal entities.

	Anti-Money Laundering and Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing: AML/CTPF	
	Document No. : PD-IR-011	Revision No. REV00
	Effective Date :December 8, 2023	หน้าที่ :5/8

2. Require customer due diligence (CDD) to verify the information and evidence that the customer has provided to the company in accordance with the law, both for customers seeking face-to-face relationships (face-to-face channel) and customers not seeking face-to-face relationships (non-face-to-face channel), whereby customers must provide complete and sufficient information.
3. Require verification of the customer's identity to check the accuracy and completeness of the information and evidence for identification by checking the customer's name and individuals in the "Designated Persons List (Sanctions Lists)" database of the Anti-Money Laundering Office (AMLO), which are persons, groups of persons, legal entities or organizations suspected of being involved in terrorism, as announced by the relevant agencies before establishing a relationship and conducting transactions with customers at all times.
4. The working group assesses the level of risk in anti-money laundering, combating the financing of terrorism and the proliferation of weapons of mass destruction for the customer before presenting to management for consideration and deciding whether to establish a relationship or conduct transactions with the customer.
5. Rejection of customer acceptance – The company will refuse to establish a relationship and conduct transactions with a customer if, upon inspection, the following is found:
 - 5.1. It is found that the customer has provided false information and evidence, such as concealing their name and surname, using a pseudonym, using an alias, etc.
 - 5.2. It is found that the information is insufficient, or the facts cannot be verified from the information and evidence received from the customer.
 - 5.3. It is found that the customer is on the Designated Persons List (Sanctions Lists) of the Anti-Money Laundering Office (AMLO).
 - 5.4. It is found that the customer has a high risk in anti-money laundering, combating the financing of terrorism and the proliferation of weapons of mass destruction, which will impact the company.

Risk Management for Anti-Money Laundering and Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing Within the Organization

1. The company takes into consideration risks related to customers, areas or countries, products or services, or service channels when assessing risks within the organization.
2. The company considers the national risk assessment report from the Anti-Money Laundering Office (AMLO) when assessing risks within the organization.

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	Document No. : PD-IR-011	Revision No. REV00
	Effective Date : December 8, 2023	หน้าที่ : 6/8

Risk Management for Anti-Money Laundering and Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing Toward Customers

1. The company has a risk management process for all customers, by considering factors for determination as required by law at minimum. Risk management begins from the customer identification, verification, and due diligence process.
2. The company determines risks for each individual customer by monitoring their business activities to ensure compliance with the customer's risk level.

Transaction Reporting

The company has established processes and systems for reporting the company's transactions involving assets, financial transactions, and suspicious transactions in compliance with the law.

Data Retention and Confidentiality


1. The retention and maintenance of important customer identification data and evidence for each customer, as well as records of all transaction movements, are systematically stored in a manner that allows for auditing and retained for the period specified by law.
2. Documents relating to the verification of customer due diligence for each customer, as well as documents related to the approval or rejection of relationships, undergo a systematic filing process that allows for auditing, and are retained for the period specified by law.
3. The company has set the customer's information, customer due diligence, and customer transactions as confidential, except when disclosure is required by law.

Internal Control Measures

1. The company has established a governance structure by designating supervisory-level employees to oversee legal compliance operations.
2. The company has established a systematic employee screening process prior to hiring at all levels and positions.
3. The company has established an independent internal audit process.

Policy Review

The company regularly reviews and discloses policies, operational procedures, and relevant announcements related to anti-money laundering, combating the financing of terrorism and proliferation of weapons of mass destruction

	Anti-Money Laundering and Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing: AML/CTPF	
	Document No. : PD-IR-011	Revision No. REV00
	Effective Date :December 8, 2023	หน้าที :7/8

to keep up with current situations. This allows employees at all levels to correctly comply with updated content. Reviews can be conducted at least annually or when laws are amended.

This shall be effective from December 8, 2023 onwards.



Policy Approver
Mr. Adisak Sukumvitaya
Chairman of the Board

