

Anti-Money Laundering and Terrorist Financing Policy



Definition

Money Laundering means the process of converting money or assets obtained through unlawful activities into money or assets that appear legitimate or cannot be easily traced to their illicit origins.

Terrorism means acts of terrorism as defined under the Criminal Code or offenses as stipulated in international conventions and protocols on terrorism to which the company's operating country is a signatory or adheres, regardless of whether such acts occur domestically or internationally.

Anti-Money Laundering and Terrorist Financing Policy

SiS Distribution (Thailand) Public Company Limited (“the Company”) recognizes the importance of complying with laws and regulations concerning anti-money laundering (AML) and counter-terrorist financing (CFT). The Company is committed to promoting transparency and integrity across all business operations. This policy has been established to guide the Company’s efforts in managing risks related to money laundering and terrorist financing, as outlined below:

1. Directors, management, and employees of the Company and its subsidiaries must strictly adhere to this policy and must not, under any circumstances, engage in or facilitate money laundering or terrorist financing activities, directly or indirectly.
2. The Company will designate appropriate personnel to oversee AML/CFT compliance and implement internal control measures to manage risks associated with money laundering and terrorist financing.
3. The Company will not engage in transactions or relationships with individuals or entities suspected of involvement in money laundering or terrorist financing.
4. The Company will promote awareness and understanding of the importance of AML/CFT compliance among directors, executives, and employees.
5. It is the duty of all persons to report any suspicious activities or information regarding potential money laundering or terrorist financing involving the Company or its subsidiaries to the Company.

Guidelines for Anti-Money Laundering and Terrorist Financing Policy

1. The Company will follow customer due diligence process, as outlined in the Trade Compliance Policy, to avoid business relationships with individuals or entities suspected of money laundering or terrorist financing.
2. Customer information will be periodically reviewed or reassessed when suspicious transactions or circumstances arise.
3. Reports on potential money laundering or terrorist financing activities will be reviewed by the Quality Assurance Department. Initial findings will be presented to the Audit Committee, which will appoint a task force to investigate further. Findings will then be escalated to the Board of Directors and relevant regulatory authorities as required by law.
4. This Anti-Money Laundering and Terrorist Financing Policy is considered a strict discipline that must be adhered to diligently. Any person who violate or fail to comply with it are deemed to be acting against the Company's policies and the Codes of Conduct, may lead to disciplinary action in accordance with the Company's employment regulations, and may also be subject to legal penalties.



Consulting and Reporting Non-Compliance relating to the Anti-Money Laundering and Terrorist Financing Policy

The Company provides an opportunity for all stakeholders to report the clues and complaints of non-compliance relating to the Anti-Money Laundering and Terrorist Financing Policy. The stakeholders can report the clues and complaints through established channels for the purpose of conducting a thorough investigation and assessment of the reported complaints, with the following details:

1. The Quality Assurance Department, under the oversight of the Audit Committee, is responsible for managing and conducting investigations when disclosures or complaints related to non-compliance with the Anti-Money Laundering and Terrorist Financing Policy are received.
2. For external stakeholders, the Company provides a channel for receiving complaints regarding non-compliance with the Anti-Money Laundering and Terrorist Financing Policy. This channel is also dedicated to providing consultation and guidance about the Anti-Money Laundering and Terrorist Financing Policy, as follows:
 - The Audit Committee
 - Address: 9 Pakin Building, 9th Floor, Room No. 901, Ratchadaphisek Road, Din Daeng, Bangkok 10400
 - Tel: 020-020-3000 Ext. 3291
 - Email: independentdirector@sisthai.com
3. For internal stakeholders, the Company provides a channel for receiving complaints about non-compliance with the Anti-Money Laundering and Terrorist Financing Policy. These channels are also dedicated to providing consultation and guidance about the Anti-Money Laundering and Terrorist Financing Policy, as follows:
 - 3.1 Supervisors, executives, and the Management who are entrusted by the complainant or the whistleblower.
 - 3.2 Human Resources Manager
 - 3.3 Quality Assurance Department
 - 3.4 Company Secretary
 - 3.5 Lotus Notes Database named: Secret Suggestion Box
 - 3.6 The Audit Committees as per communication channel stated in item 2.

This Anti-Money Laundering and Terrorist Financing Policy has been approved by the Board of Directors in the Board of Directors' meeting of No. 6/2024 held on December 13th, 2024.

This policy shall be effective from January 1st, 2025, onwards.