



SUTHA

Golden Lime Public Company Limited

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



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Destruction Policy**

Golden Lime Public Company Limited has formulated guidelines for compliance with laws, regulations, or measures for suppressing money laundering or any process of concealing the origin of money obtained from illicit activities by converting it into a legitimate source to conceal the identity, source in order to avoid attracting investigations by legal authorities to be tracing. Being aware of such threats, the Company is to establish measures to prevent and suppress money laundering, counter-terrorism financing, and the proliferation of weapons of mass Destruction.

To supervise implementations regarding with anti-money laundering Act B.E. 2542 (1999) in consistent with the Anti-Money Laundering (AMLO) guidance, the Company has established a policy to suppress money laundering and financing terrorism and the proliferation of weapons of mass destruction as a part of business ethics all of which were considered and approved by the Board of Directors of the Company, all directors, executives and employees to follow in order to counter Anti-Money Laundering and Terrorism Financing so that the Company will not be engaging or contributing income from illegal activities into its financial system.

The Company commits to preventing directors, executives, and employees from misconduct concerning money laundering, terrorism, or other financial crimes so establishes a working manual for personnel of SUTHA who directly involve in customers and customer transactions to follow to counter money laundering, and terrorism financing in an efficient manner.



Guideline for the management of risks associated with money laundering of customers conducting trade transaction with the company

The company has the responsibility and ethics to determine the policy and practices for risk management on customer's money laundering as the company is running a business that involves foreign exchange transactions from customers who are using services provided by the company. The company is committed to protecting the organization from being a money laundering source and supporting terrorism by strictly complying with the law on anti-money laundering as well as related laws and practices specified by Anti-Money Laundering Office (AMLO). The Company has set out a policy and various measures as per below to ensure examining the facts about customers, and to supervise everyone in the organization to follow the below practices in an efficient manner.

1. Purpose

The company has determined a policy that is approved by the company's board of directors with the commitment to anti-money laundering and countering the financing of terrorism. The company has also the responsibility and ethics to comply with the law on anti-money laundering and follow the international standards on anti-money laundering and fighting against the financing of terrorism.

The company has a policy in trading with customers and , the risk management that may involve money laundering by customers, and the principles of practices on the examination procedure for the facts about customers which is the main procedure in examining and preventing the company from being a money laundering source or providing financial support to terrorism that is in line with the specified laws. In this regard, the company will be responsible for managing the organization and personnel so as to ensure of the compliance to such a policy in a continually efficient manner.

2. Responsibility to comply with the company's policy

2.1 The Company's authorized executive recognizes the importance of anti-money laundering and countering the financing of terrorism by ensuring that every employee must strictly follow the policy, regulations and practical guidelines provided by Anti-Money Laundering Office (AMLO).

2.2 The Company's authorized executive has assigned the authorized executive responsible for the compliance of the law on anti-money laundering to coordinate with the Anti-Money Laundering Office.

2.3 The Company's authorized executive has determined the risk control measures against potential money laundering activities and financial support to terrorism that may be caused by the foreign exchange services provided by the company.

2.4 The Company's authorized executive has provided support and urged employees to acquire adequate knowledge and understanding on anti-money laundering and countering the financing of terrorism in order for compliance with the law on anti-money laundering.



2.5 The Company's authorized executive has set out orders, rules and manuals that are consistent with the policy on anti-money laundering and countering the financing of terrorism determined by Anti-Money Laundering Office (AMLO).

3. Trading procedure

The Company has determined the procedures in a trading process, offering for sale of goods and services before making transactions with regular and irregular customers by acquiring customer's information that they can be identified accurately, registered onto the Company's vendor list such as a copy of the company certificate, VAT registration or ID card copy, etc. Before the first transaction or agreement with new or irregular customers, in determining a payment credit terms and conditions, there shall be under due diligence of such customer's information to analyze its financial risk before the transaction, credit approval to be verified against the name list with legally specified risks to prevent the company from being used as a tool or medium in money laundering or financial support to terrorism.

4. Customer Verification and Identification

The Company has determined the types of regular and irregular customers so as to obtain information and identification evidence as specified by the law, and the company has verified customer's information so as to identify the customer before implementing any further risk management procedures as specified by the law.

5. Management of risks that may associate with money laundering by customers

The Company has determined measures in considering risks that may involve money laundering by customers as specified by the law and may be consistent with the Anti-Money Laundering (AML) international standards so as to ensure that such measures can prevent or reduce the risk of using the company as a channel or medium for money laundering and financial support to terrorism.

5.1 The Company has determined the risk assessment regarding money laundering and financial support to terrorism so as to realize the level of needs for collecting data and identification evidence appropriately according to all levels of risks involved with money laundering and financial support to terrorism.

5.2 The Company has provided appropriately more rigorous measures in examining and verifying the facts about a customer who has a high risk of committing money laundering.

5.3 The Company has determined the risk management procedure and review of information and the facts used in managing customer risks on a regular basis, particularly for those customers with high risks of conducting money laundering. If the facts for risks of money laundering or financial support to terrorism are found, the company shall examine in order to decline or oppose to the relationship with that customer. However, if the relationship is to be established or maintained, the company shall report as suspicious transactions to the Anti-Money Laundering Office (AMLO) immediately.

6. Human Resources development

In the annual work plan, the Company provides employee trainings regarding with international transactions, various payment or money transfer either locally or internationally and etc.



so that employees are aware of rules, regulations and information updated from the Anti-Money Laundering Office, so as to apply such knowledge into their work practices appropriately.

7. Utilization of information technology in examining customers related facts

The Company provides access to various useful databases in examining the facts about customers as specified by the law, for example, information on individuals committing predicate offences or money laundering, a list of individuals with a political status associated with some countries, a list of groups of individuals who have been concluded or announced under the United Nations Security Council resolutions to have committed terrorism, and so on, by using information technology designed for anti-money laundering activities efficiently.

8. Verifying facts about customers

The Company sets up a procedure for examining the facts of customers of all types until customers end the business relationships. Also, customer information will be checked and updated on a regular basis such as reviews of customer information and requests for important supplementary supportive documents. Customer information will be cross-checked with various customer databases while suspicious transactions will be monitored with clear working procedures. Risk management and examination of the facts about customers will be reviewed constantly for the whole period of the relationship with customers. Such information will be stored and maintained as stipulated by the law.

9. Reporting a suspicious transaction in investigating facts about a customer.

9.1 The Company has established a system for reporting suspicious transactions to AMLO under the terms and conditions of money laundering laws and related regulations.

9.2 The Company has developed a system or method to enable timely reporting of suspicious transactions and detect traces of unusual or suspicious transactions.

9.3 The Company specifies the characteristics of transactions that are at least suspicious in accordance with the guidelines set by the AMLO Office, for example: Transactions receiving payments in foreign currencies in cash over 10,000,000 baht or other suspicious transactions

9.4 The Company does not disclose to customers that it has reported suspicious transactions to AMLO.

10. Data Retention

10.1 The Company keeps documented data and identifiable evidence or other documented evidence of customers that are used in examining the facts about customers as stipulated by the law.

10.2 The Company keeps documented data and evidence related to transaction reporting, risk assessment, and analysis of customer information related to the due diligence process in accordance with the law for 5 years from the date the customer executes the transaction.



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10.3 The Company keeps all related information available for inspection once the AMLO requests to verify at all times and the data retention period is in consistent with the policy, regulations and requirements .

11. Other

This policy and practices are applicable to the Company and its subsidiaries.

The Anti-Money Laundering and Counter Terrorism Financing and Proliferation of Weapon of Mass Destruction Policy was established in written on 15th December 2022 and proposed to the Board of Directors Meeting No. 2/2023 held on 24th February 2023. The latest revision is to be disclosed on the website of the Company.

Mr. Sripop Sarasas

The Chairman of the board

Document Revision

No.	Document Number	Document dated	Approved and reviewed	Proposed to the Board of Directors meeting for acknowledgment/for approval.
1	CS20221215	15 December 2022	February 24, 2023	The Board of Directors Meeting No. 2/2023