

## Scope of AML/CFT Policy

### Part I General Financial Information

#### A. Financial Institution Details

- 1) Financial Institution Name: Bank of Ayudhya Public Company Limited
- 2) Registered Address: 1222 Rama III Road, Bang Phongphang, Yan Nawa, Bangkok 10120 Thailand
- 3) Head Office Address: 1222 Rama III Road, Bang Phongphang, Yan Nawa, Bangkok 10120 Thailand
- 4) Registered No.: 0107536001079
- 5) Website Address: [www.krungsri.com](http://www.krungsri.com)
- 6) SWIFT Address: AYUDTHBK
- 7) Legal Name of Parent Company: MUFG Bank, Ltd.
- 8) Country and Date of Incorporation of Parent Company: Japan and 15 August 1919
- 9) Number of Branches/Subsidiaries/Representative Office:

#### Overseas

Branches: 2 Branches in Laos (Suvannakhet and Vientiane)

Subsidiaries: 2 Subsidiaries (Laos and Cambodia)

Representative Office: 1 Representative Office in Myanmar

#### Domestic

Branches:

<https://www.krungsri.com/bank/en/InvestorRelations/GeneralInformation/FACT-SHEET.html>

Subsidiaries:

<https://www.krungsri.com/bank/en/Other/Subsidiaries.html>

10) Main Business Activities: Commercial banking

11) AML Compliance Officer: Mr. Saengchart Wanichwatphibun

Position: Chief Compliance Officer (CCO)

Telephone: +66 2296 3584

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12) Contact Person

Bank Financial Institution

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Compliance Division

1. Jittra Hongchindawut, Anti-Money Laundering Department

Email: Jittra.Hongchindawut@krungsri.com

2. Chatpavee Pichitvoraroj, Anti-Money Laundering Department

Email: Chatpavee.Pichitvoraroj@krungsri.com

**B. Share Structure Directors/Ownership Structure**

1) Name of Stock Exchange: The Stock Exchange of Thailand

2) Shareholders:

<https://www.krungsri.com/bank/en/InvestorRelations/GeneralInformation/ShareholderStructure.html>

- 3) Board of Directors and Main Directors:

<https://www.krungsri.com/bank/en/Other/AboutUs/CommitteeStructure/Board-of-Directors.html>

- 4) Senior Executives:

<https://www.krungsri.com/bank/en/Other/AboutUs/ExecutiveOfficers.html>

#### C. Laws and Regulations

- 1) Name of Regulatory Body: Bank of Thailand (BOT)
- 2) Name of External Auditors: Deloitte Touche Tohmatsu Jaiyos Audit Co., Ltd.
- 3) Name of AML Supervisory Authority: Anti-Money Laundering Office (AMLO)

### Part II AML/CFT

#### A. General AML/CFT Policy, Framework and Procedures:

- 1) Our policy was approved by the Board of Directors.
- 2) Our Bank has a compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework.
- 3) Our Bank has developed a written policy and documented the processes that we have in place to prevent, detect and report suspicious transactions.
- 4) In addition to inspections by the regulators, our Bank has an internal audit function that assesses AML policies and practices on a regular basis.
- 5) Our Bank policy prohibits accounts/relationships with shell bank.
- 6) Our Bank has a policy to reasonably ensure that we will not conduct transactions with or on behalf of shell banks through any of its accounts or products.

- 7) Our Bank policy covers the requirements pertaining to the relationships with Politically Exposed Persons (PEP's), their family and close associates.
- 8) Our Bank policy prohibits transactions with sanctioned countries or blocked persons.
- 9) Our Bank has a record retention procedure that complies with applicable laws.
- 10) Our Bank's AML policy and framework apply to all branches and subsidiaries both in Thailand and in location outside of Thailand.

**B. Risk Assessment**

- 1) Our Bank conducts the Self-Risk Assessment (SRA) per the Anti-Money Laundering Office (AMLO)'s announcement.
- 2) Our Bank conducts a risk-based assessment of customer and their transactions.
- 3) Our Bank determines the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that our Bank has reasons to believe that they may pose a heightened risk of illicit activities through our Bank.

**C. Know Your Customer, Due Diligence and Enhanced Due Diligence**

- 1) Our Bank has implemented processes to identify customers, who maintain and/or conduct transactions with the Bank.
- 2) Our Bank has a requirement to collect information regarding its customer's business activities.
- 3) Our Bank has a process to review and, where appropriate, update customer information, especially those of high-risk client.
- 4) Our Bank has procedures to establish a record for each new customer noting their respective identification documents and "Know Your Customer" Information.

- 5) Our Bank conducts a risk-based assessment to understand the normal and expected transaction of our customers.

**D. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds**

- 1) Our Bank has a policy and procedures in identifying and reporting on transactions that are required to be reported to the authorities.
- 2) Our Bank has procedures in identifying structured transactions to circumvent the regulatory requirements.
- 3) Our Bank screens customers and transactions against lists of persons, entities or countries per the AMLO (Thai regulator), UN, OFAC and JFEL (Japan) sanction lists.
- 4) Our Bank has a policy to reasonably ensure that it only operates with correspondent banks that possess licenses to operate.

**E. Transaction Monitoring**

- 1) Our Bank has both automated and manual monitoring program to detect unusual and potentially suspicious activities.

**F. AML Training**

- 1) Our Bank provides E-Learning and classroom training covering AML/CFT-related topics for all staff.
- 2) Our Bank's training on AML/CFT areas include, but not limited to:
  - Identifying and reporting of transactions that must be reported to regulatory authorities.
  - Examples of different forms of money laundering involving our Bank's products and services.
  - Information relating to economic sanctions requirements.
  - Internal policy to prevent money laundering.

- 3) Our Bank retains records of our training sessions including attendance records and relevant training materials used.
- 4) Our Bank communicates new AML related laws and/or changes made to the existing AML related policy or practices.

Declaration

I certify that Bank of Ayudhya and its subsidiaries have policies in place to ensure compliance with applicable laws and the AML Program.

Name: Mr. Saengchart Wanichwatphibun

Title: Chief Compliance Officer (CCO)

Signature:



Date:

5/2/20