




PRTR Group Public Company Limited.

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

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This Anti-Money Laundering, Combating the Financing of Terrorism, and Proliferation of Weapons of Mass Destruction Policy (the “**AML/CFT Policy**”) is the exclusive property and copyright of PRTR Group Public Company Limited (the “**Company**”). The Company is committed to developing a corporate governance system that aligns with the principles of good corporate governance, best practices, as well as the laws, regulations, and requirements prescribed by official and regulatory authorities.

The Board of Directors approved this AML/CFT Policy at Board Meeting No. 6/2023 on November 10, 2023. This is to ensure that the Board of Directors, executives, employees, and related parties of the Company and its subsidiaries utilize this policy as a fundamental principle and practical guideline for their operations, effective from November 10, 2023, onwards.

To ensure that the AML/CFT Policy remains current and appropriate to evolving situations and changes, a review of the policy shall be conducted at least once a year. Any amendments or revisions must be approved solely by the Board of Directors.



(Mr. Niphon Bundechanan)
Acting Chairman of the Board of Directors.



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1. Introduction


PRTR Group Public Company Limited (the “Company”) is firmly committed to Anti-Money Laundering (AML) and Combating the Financing of Terrorism and the Proliferation of Weapons of Mass Destruction (CFT/WMD). The Company prioritizes full compliance with the Anti-Money Laundering Act and the Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing Act. This commitment ensures that the Company’s business operations align with the laws, rules, and regulations prescribed by official regulatory authorities, as well as the Company’s Corporate Code of Conduct and the principles of Good Corporate Governance.

2. Objectives

- 2.1 To establish a core corporate policy for the Company and its subsidiaries, mandating their duty to strictly comply with Anti-Money Laundering (AML), Counter-Terrorism Financing (CTF), and Proliferation of Weapons of Mass Destruction (WMD) laws and regulations.
- 2.2 To serve as a standardized operational guideline and a supervisory framework for the Company and its subsidiaries, ensuring consistent adherence to legal requirements regarding the prevention of money laundering, terrorism financing, and the proliferation of weapons of mass destruction.
- 2.3 To ensure that directors, executives, employees, and all related parties possess a correct and unified understanding of this policy, enabling them to execute their duties in a consistent direction and in full compliance.

3. Scope

This policy applies to the Company and its subsidiaries, encompassing the core principles, policy framework, and operational guidelines.

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4. Principles and Rationale


The Company recognizes the paramount importance of compliance with the Anti-Money Laundering Act B.E. 2542 (1999) and the Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing Act B.E. 2559 (2016). Accordingly, the Company has established operational manuals, procedures, and regulations to enable employees directly engaging with customers to manage transactions in strict alignment with this policy. These measures are designed to effectively combat money laundering, terrorism financing, and the proliferation of weapons of mass destruction.

5. Anti-Money Laundering, Counter-Terrorism Financing, and Proliferation of Weapons of Mass Destruction Policy (AML/CTF/WMD Policy).

The Company has established this Anti-Money Laundering, Counter-Terrorism Financing, and Proliferation of Weapons of Mass Destruction Policy to serve as the fundamental principles and operational guidelines for directors, executives, and employees, as follows:

5.1 Roles and Responsibilities for Policy Compliance


1. Executives must prioritize Anti-Money Laundering (AML) and Counter-Terrorism Financing and the Proliferation of Weapons of Mass Destruction (CTF/WMD). They are responsible for ensuring that all employees strictly adhere to the Company's policies, operational procedures, and all relevant laws and official regulations.
 2. The Company shall oversee internal personnel to ensure full compliance with the Policy, the Anti-Money Laundering Act, and the Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing Act. Furthermore, the Company shall serve as the primary liaison with the Anti-Money Laundering Office (AMLO).
 3. The Company mandates the Internal Audit Department to establish risk control measures to mitigate potential money laundering, terrorism financing, and the proliferation of weapons of mass destruction risks that may arise from the use of the Company's products, services, and various service delivery channels.
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4. Management must support and promote adequate knowledge and understanding among employees regarding Anti-Money Laundering (AML) and Counter-Terrorism Financing and the Proliferation of Weapons of Mass Destruction (CTF/WMD). This is to ensure that employees can effectively comply with the Anti-Money Laundering Act and the Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing Act.
5. Management shall establish orders, regulations, and operational manuals that align with the AML/CTF/WMD Policy in accordance with the guidelines prescribed by the Anti-Money Laundering Office (AMLO). In the event that any regulations or guidelines issued under this law, or other applicable laws, are inconsistent with the operational practices, the most stringent standard shall prevail and be strictly followed.

5.2 Receiving Clients

1. The Company must conduct Know Your Customer (KYC) and Customer Due Diligence (CDD) procedures to verify the identity and facts regarding the customer prior to establishing a business relationship or executing any transactions.
 2. Enhanced Due Diligence (EDD) must be strictly applied to customers categorized as high-risk.
 3. Customer data and Ultimate Beneficial Owners (UBO) must be screened against high-risk money laundering watchlists as prescribed by law, including lists of designated persons associated with terrorism and the proliferation of weapons of mass destruction, and any future lists announced by the Anti-Money Laundering Office (AMLO). This also includes supplemental AML/CTPF risk databases from external service providers.
 4. An AML/CTPF risk assessment must be performed to determine the customer's risk level before establishing a business relationship or accepting any transactions.
 5. The Company shall designate Senior Management to review and authorize the establishment of business relationships or the execution of transactions with high-risk customers.
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6. The Company shall not establish a business relationship or conduct transactions with customers exhibiting the following characteristics:

- Customers who conceal their real name/surname or use aliases/fictitious names for transactions.
- Customers who provide false information or present fraudulent evidence.
- Customers whose identification information and evidence do not comply with the Prime Minister's Office Notification regarding Customer Identification Methods for Financial Institutions and Professionals under Section 16.
- Customers whose identification information and evidence cannot be verified.
- Customers or Ultimate Beneficial Owners identified as designated persons on the AMLO watchlist, or where accepting the customer would expose the Company to risks of money laundering, terrorism financing, or the proliferation of weapons of mass destruction.

5.3 Risk Assessment and Management of Money Laundering and Financial Assistance to terrorism and the proliferation of weapons of mass destruction.

1. The Company shall conduct an internal AML/CTPF risk assessment and maintain documented records of the assessment results. This includes establishing written risk mitigation measures and methodologies to effectively manage and reduce potential risks.
2. The internal AML/CTPF risk assessment report is categorized as a high-priority policy and operational procedure. It must be formally approved by the Board of Directors or the highest-ranking authorized executive.
3. The methodology for conducting the internal AML/CTPF risk assessment is based on the following principles:

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3.1 The Company shall incorporate risk assessment reports published by the Anti-Money Laundering Office (AMLO) into its internal evaluation process.

3.2 The Company shall consider various risk factors in accordance with the guidelines prescribed by the Anti-Money Laundering Office (AMLO).

3.3 The Company shall perform a comprehensive risk evaluation, summarize the findings, and establish specific risk mitigation measures and methodologies.

4. The Company shall review and update the data used for the internal AML/CTPF risk assessment to ensure it remains current. A formal review and data update cycle is mandated at least once every year.


5.4 Money Laundering Risk Management and Terrorist Financing and the proliferation of weapons of mass destruction for customers.

The Company has established comprehensive risk management procedures for all customers, incorporating risk factors that meet or exceed the requirements prescribed by law. The Company shall manage and mitigate risks throughout the entire duration of the business relationship, from inception until the formal termination of the relationship. This risk management framework encompasses the following stages: initial assessment for customer identification and verification; the determination of risk levels for each individual customer; ongoing monitoring of transactions to ensure alignment with the customer's risk profile; periodic reviews of customer due diligence data based on the assigned risk level; and continuous risk assessment reviews until the termination of the business relationship with each customer.

5.5 Transaction Reporting

The Company prioritizes the detection of unusual or suspicious transactions, as well as cash transactions as prescribed by law. Furthermore, the Company shall implement regular monitoring and review of customer transactions. In the event that a suspicious transaction is identified, a report must be promptly submitted to the Anti-Money Laundering Office (AMLO).

5.6 Data Retention

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1. The Company shall maintain records of all customer identification documents, identity verification evidence, transaction monitoring reports, and any other relevant customer documentation in accordance with the criteria prescribed by law.
2. The Company shall retain customer risk assessment data, Customer Due Diligence (CDD) analysis reports, and all documents and evidence related to transaction reporting as required under the Anti-Money Laundering Act.
3. The documents specified in items 1 and 2 must be readily available for inspection by relevant official authorities at all times. The duration of data retention must strictly align with the Company's policies, operational procedures, and the laws and regulations of the respective governing authorities.

5.7 Confidentiality


The Company mandates strict confidentiality regarding Customer Due Diligence (CDD) processes, transaction reporting, and the submission of any information to the Anti-Money Laundering Office (AMLO). Such information shall not be disclosed, except as required by law, by court order, or for disclosures between the Company and its subsidiaries in connection with compliance under the Anti-Money Laundering Act.

5.8 Internal Control Measures

The Company shall establish and implement internal control policies and procedures that are appropriate to its internal risk profile and business scale, characterized by the following:

1. A governance structure shall be established, designating executive-level personnel to oversee and ensure legal compliance.
2. An independent Internal Audit unit shall be established with the authority to audit and evaluate AML/CTPF performance across all related departments. This encompasses a comprehensive review of operational processes, personnel conduct, and supporting Information Technology (IT) systems at least once a year. The results of these audits must be formally reported to the relevant committees or Senior Management.

5.9 Personnel Selection and Training

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Personnel recruited to work within the organization must not be individuals associated with money laundering, terrorism, or the proliferation of weapons of mass destruction. All new employees are required to complete AML/CTPF training and must pass a post-training assessment prior to their formal appointment. Records of such training must be maintained as evidence. Furthermore, current employees are mandated to undergo AML/CTPF refresher training at least once a year.

5.10 Review and Improvement of Policies and Procedures

The Company has established a framework for the development and improvement of its policies and operational procedures, ensuring they are periodically reviewed and consistently updated. Accordingly, the Company shall review its policies and procedures to ensure continued alignment with applicable laws. Such reviews shall be conducted upon any changes in laws, rules, or official regulations, or in response to shifts in money laundering, terrorism financing, and the proliferation of weapons of mass destruction risk profiles. In any event, a formal review shall be conducted at least once a year.

Appendix: List of Companies Subject to This Policy

This policy applies to **PRTR Group Public Company Limited**, as well as its subsidiaries under its direct or indirect control.

The companies within the scope of this policy include the following:

1. PRTR Recruitment Company Limited
2. PRTR Recruitment and Outsourcing (Eastern Seaboard) Company Limited
3. Nexmove Platform Recruitment Company Limited
4. The Blacksmith Company Limited
5. Pinno Solutions Company Limited
6. PRTR Global Recruitment Company Limited
7. Biz Resource Company Limited

Remarks:

- Newly established subsidiaries or subsequent investments shall automatically fall within the scope of this policy, unless otherwise specified.
- For companies not under the Company's control, this policy may be adopted and applied as appropriate.

Additional Note: This appendix shall be deemed an integral part of this policy and shall have the same full force and effect as the main policy in all respects.