

**Statement regarding
Anti-Money Laundering, Counter-Terrorism and Proliferation of
Weapon of Mass Destruction Financing (AML/CFT/WMD)**

1. Administrative Information

Legal name:	The Siam Commercial Bank Public Company Limited
Principal place of business/legal address:	9 Rutchadapisek Road, Chatuchak, Bangkok 10900
Place of Incorporation:	Thailand
Legal Status:	Public Company Limited
Company Registration Number:	0107536000102 issued by Ministry of Commerce
Certificate of Incorporation issued by:	Ministry of Finance
Regulators:	Bank of Thailand, Anti Money Laundering Office
External Auditor:	KPMG

2. Anti-Money Laundering, Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing (AML/CFT/WMD)

a) Anti Money Laundering Office Notification:

- Anti Money Laundering Act. B.E. 2542 (1999) (as amended until Anti Money Laundering Act (No.5) B.E. 2558 (2015))
- Anti Money Laundering and Counter Financing of Terrorism and Proliferation of Weapon of Mass Destruction Financing Act B.E. 2559 (2016)
- Notification of the Office of the Prime Minister Re: Financial Institutions' Customer Identification B.E. 2555 (2012)
- Ministerial Regulations Prescribing Rules and Procedures for Customer Due Diligence B.E. 2555 (2012)

b) Bank of Thailand Notification:

- Policy Statement Re: Measures on Anti Money Laundering and Combating the Financing of Terrorism (AML/CFT) for Financial Institutions.
- Circulation of the Notification of Bank of Thailand No. Sor. Nor. Sor. 7/2559 Re: Requirement for Commercial Banks on the Practice in Accepting Deposits.

The Bank's anti money laundering policies and procedures apply to all of our domestic branches, foreign branches and subsidiaries.

For foreign branches operating in a jurisdiction outside the borders of Thailand, that branch is required to comply with the higher of local (i.e. local to that jurisdiction) statutory and regulatory requirements.

In accordance with the anti-money laundering laws and regulations, we have established internal policies/ procedures, including:

1. **Know Your Customer/Customer Due Diligence:** AML/CFT policy is the identification of customer by official documents and other relevant information. Whenever SCB is required to identify a customer, the ultimate beneficiary (of the account/the cash transaction) must be established.
2. **Walk-in Customer:** The Bank is required to know and keep the true identification of walk-in customer who wants to carry out a financial cash transaction when:
 - a single or multiple transactions conducted that appear to be linked and added to a total amount of THB 100,000 or above; and
 - a write transfer or an electronic payment is carried out in the amount of THB 50,000 or above.
3. **Anonymous Account:** The bank is prohibited from allowing depositors to conceal their real name and to use alias or false name to open deposit account.
4. **Record Retention:**
 - Records relating to customer's identification are maintained and kept for ten years after the termination of relationship.
 - Records relating to customer's transaction are maintained and kept for ten years after such transactions are occurred.
5. **Monitoring of suspicious transactions:** Monitoring is carried out through a risk-based approach. Staffs receive periodic training and reminders of the requirements to report suspicious transactions and how to identify them.

6. **Report of suspicious transactions:** The bank is required to report any suspicious customer activities to the regulatory authority, AMLO. Internal policies and procedures are in place to ensure compliance with the applicable legislation and regulatory requirements.
7. **Politically exposed persons (PEPs):** The bank specified that customer facing, customer relationship management, or other assigned departments are required to verify customers' status with the PEPs customer database. Should customers or relevant personnel be identified as PEPs, they will be classified as high risks customer. A list of high-risk customers is being reviewed annually.
8. **Senior management sign off on PEP customers:** the bank assigned authorized senior management the responsibilities in reviewing and accepting high-risk customers.
9. **Employee training program:** Training is annually provided to business units that offer products and services that are subject to the legislative requirements.
10. **Independent Audit and Compliance review function:** Our auditors and Compliance conduct programs of audits and compliance testing of all the bank's policies and operational procedures including those applicable to AML. The frequency and scope of the audits and compliance tests are determined through a risk-based approach, where higher risks to the bank are audited and tested more frequently. Procedures are also prescribed in line with the AMLO's practice guidelines and regulations and shall be reviewed on a regular basis.
11. **Correspondent banks:** The bank has put in place procedures that reflect the intention and meaning of international standards on Combating Money Laundering and the Financing of Terrorism and Proliferation of the Financial Action Task Force (FATF) Recommendation in relation to cross border correspondent banking. These procedures include, but are not limited to, the followings understanding the nature of the correspondent bank's business, the quality of their management, ownership and effective control, external oversight and prudential supervision.
12. **Shell banks:** The bank has neither relationship nor business with shell banks.
13. **Combating the financing of terrorism:** Business relationship and transactions shall be declined when customers name is found that customers or their real beneficiaries are member of parties classified as those committing acts or terrorism by the United Nations Security Council's (UNSC) resolution endorsed by the Thai government and Thailand local list announced by the Anti Money Laundering Office.

14. **Nested Account:** The Bank does not permit other financial institutions to operate directly through its correspondent accounts.

15. **Payable-through Account:** The bank does not allow customers to have direct access and transact business through its correspondent accounts.