

Counter-Terrorist Financing Policy

Boutique Corporation Public Company Limited

Counter-Terrorist Financing Policy

1. Principles

Boutique Corporation Public Company Limited (the “**Company**”) aims to conduct business only with parties that are involved in legitimate activities and shall neither offer our services nor provide any assistance in facilitating transaction which, we have good reasons to believe, may be associated with financing of terrorism activities. The Company has therefore established this policy including guidelines to ensure that directors, management and employees conduct its activities in compliance with Counter-Terrorist Financing (“CTF”) laws and regulations.

2. What is Terrorism?

- The unlawful use of violence and intimidation, acts of intentional or disregard for the safety of those who are not involved, in the pursuit of religious or political aims.
- Examples of terrorism acts included hijackings, hostage takings, kidnappings, mass shootings, car bombings and suicide bombings.

3. Roles and Responsibilities

3.1 The management team is responsible for establishing the Counter-Terrorist Financing Policy of the Company and the Board of Directors is responsible for approving the Counter-Terrorist Financing Policy of the Company.

3.2 Directors, management and employees are required to comply with this policy and CTF laws of the countries in which the Company or its subsidiaries operate.

3.3 The management team is responsible for defining measures to control and manage risk associated with financing of terrorism activities that may arise from the use of transaction channels or various services of the Company.

3.4 The management team shall ensure employees have knowledge and understanding about counter-terrorist financing to prevent the Company from becoming involved in such activities.

4. Guidelines

The Company provides measures to know the identity of the customer* (Know Your Customer “KYC”) and conduct Customer Due Diligence (“CDD”) checks as follows.

*Customer means natural person, juristic person, or person having legal agreement which has a business relationship or a transaction with the Company.

4.1 Know Your Customer (“KYC”)

The Company has determined the types of customers and procedures of obtaining and checking customer information in Annex A.

4.2 Customer Due Diligence (“CDD”)

The Company has determined the types of customers and procedures for due diligence process of checking customer information in Annex A.

4.3 Rejection of accepting customers

The Company must refuse to establish business relationship or not make a transaction with a customer if there is an appearing fact of the following.

4.3.1 The customer conceals name or real last name and surname of use alias or fake name in the transaction.

4.3.2 The customer reports false information or shows false evidence.

4.3.3 The customer or the real beneficiary of the customer is on the list of designated persons who have been involved with financing terrorist activities as released by the Anti-Money Laundering Office (“AMLO”) and the United Nations Security Council (“UN”).

4.3.4 Receiving the customer would cause the Company to be exposed to money laundering.

4.4 Maintaining information and documents

The Company shall keep the information and documents relating to the customer for 5 years from the date of closing the account or terminating the relationship with the customer.

4.5 Reviewing the Policy

The Company shall review this policy at least once a year or if there is a change in the law or regulation.

Approved by:



Mr. Permpoon Krairiksh
Chairman of Board of Directors
28 September 2021

Types of Customers:	Types of Transactions:	Know Your Customer (KYC) procedure:
Land owners	Land acquisition	<ol style="list-style-type: none"> 1. All land owners are subject to customer identity verification and due diligence process regardless of amount of transaction. 2. Background check for criminal record and against AML and CTF lists on new land owner is conducted internally. (website: www.amlo.go.th)
Purchasers	Property divestment (exit)	<ol style="list-style-type: none"> 1. All purchasers are subject to customer identity verification and due diligence process regardless of amount of transaction. 2. Background check for criminal record and against AML and CTF lists on new purchaser is conducted internally. (website: www.amlo.go.th)
Investors	Investment in projects or in BC	<ol style="list-style-type: none"> 1. All investors are subject to customer identity verification and due diligence process regardless of amount of transaction. 2. Background check for criminal record and against AML and CTF lists on new investor is conducted internally. (website: www.amlo.go.th)
Non bank lenders	Lending	<ol style="list-style-type: none"> 1. All non bank lenders are subject to customer identity verification and due diligence process regardless of amount of transaction. 2. Background check for criminal record and against AML and CTF lists on new non bank lender is conducted internally. (website: www.amlo.go.th)
Suppliers/Service Providers	Purchase of goods or services	<ol style="list-style-type: none"> 1. Obtain a copy of customer ID card or passport for individual or a copy of company affidavit for company. 2. If a transaction involving Cash or Asset equal to or exceeding fifty million Baht, background check for criminal record and against AML and CTF lists on new supplier or service provider is conducted internally. (website: www.amlo.go.th)
Hotel Guests	Accommodation	<ol style="list-style-type: none"> 1. Guest fills in Guest Registration Form. 2. Front desk staff obtains a copy of customer ID card or passport of guest. 3. If a transaction involving Cash or Asset equal to or exceeding one million Baht, background check for criminal record and against AML and CTF lists on guest is conducted internally. (website: www.amlo.go.th)
Tenants	Rental	<ol style="list-style-type: none"> 1. Obtain a copy of customer ID card or passport for individual or a copy of company affidavit for company. 2. If a transaction involving Cash or Asset equal to or exceeding ten million Baht, background check for criminal record and against AML and CTF lists on tenant is conducted internally. (website: www.amlo.go.th)