# BUSINESS CONTINUITY MANAGEMENT POLICY AIRA AND AIFUL PUBLIC COMPANY LIMITED (Revision B.E. 2567)

AIRA & AIFUL Public Company Limited

Business Continuity Management Policy

(Revision B.E. 2567)

A. Reasoning for the Issuance of the Policy

AIRA & AIFUL Public Company Limited, hereinafter referred to as the "Company", is a supervised, non-

financial-institute personal loan business company under the supervision of the Bank of Thailand. The

Company's business operations naturally involve the acceptance-delivery, storage and management of data

systems and important documents, whether from government agencies, private agencies, clients, trade

partners, service providers or other third parties involved in the Company's business operations.

In view of the multitude of currently existing crises, natural disasters and human-caused disasters such

as floods, fires, earthquakes, disease epidemics, riots, accidents, sabotage, computer viruses, direct malicious

business activities, etc., all of which potentially impact the Company's business operations and might disrupt

business operations or create losses and/or damages in a widespread manner in multiple forms such as loss

of revenue, damage to business stability, reputational damage, and even impact on the morale of employees

or personnel functioning as highly essential resources of the Company,

The company has created a Business Continuity Management (BCM) policy in preparation for these

crises in order to ensure confidence that the Company's business will continue uninterrupted or recover within

a set time period as part of business organizational management to boost confidence and assurance that the

Company's business will not be disrupted despite crises, natural disasters, threats or other unexpected

situations.

B. Objectives

This policy was created to set guidelines for business continuity management in order to boost

confidence and assurance in business operations during times of crises or emergencies with consideration to

avoidance, damage prevention, and business rehabilitation in response to crisis situations.

In addition, this policy serves as an organizational management effort for creating knowledge and

understanding about business continuity plan (BCP) in line with this policy, accompanied by the presence of

drills and continuous policy and plan reviews to maintain effectiveness, keep up to date and ensure sustainable

enforcement.

### C. Scope of Enforcement

This policy applies to business continuity management in situations involving crises, natural disasters and other threats that might impact the Company's business operations such that the Company might have to temporarily or over a period of time pause business activities, by which these crises are not under the control of the Company.

This policy applies to AIRA & AIFUL Public Company Limited and company employees on every level and is not intended to be applied to third parties. However, in the issuance of this policy, certain sections of the policy might impact the business performance or activities of third parties. In such cases, agencies in responsible or acting in charge by this policy will notify such third parties about actions aimed at maintaining strict compliance to this policy.

Risk Management unit holding direct legal responsibilities shall ensure the strict implementation of this policy with consideration to impacts to the overall business operations of the Company, benefits and safety of employees and those of trade partners under the principles of good governance even during crises in order to maintain the Company as a good public company.

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### Section 1

### **General Articles**

Clause 1. Definition

"Company" means AIRA & AIFUL Public Company Limited.

"Crisis situation" means a situation caused by a natural disaster, or the actions of a person or groups of people or juristic persons or congregation of people, regardless of the names by which it is known, including terrorism, civil war, guerrilla warfare, whether or not it is structured, that is considered to be a crisis affecting the Company's business operations or activities or impacting the overall normal livelihoods of the Company's employees such as a fire, flood, earthquake, explosion, protest, resistance and/or overthrowing, terrorism, civil war, computer system intrusion, release of computer viruses, electronic data intrusion, in any form, violence and/or political conflict, along with other situations that cause the same impacts or outcomes of those described.

"Business Continuity Plan (BCP)" means a step part of a process or work plan created under this policy to maintain the Company's business continuity during a crisis situation.

"Advisory Committee" means a person or groups of people appointed to serve as advisors to the Chief Executive Office in business continuity management.

"Business Continuity Plan Working Group" refers to people, representatives and/or other working group formed by this policy to take charge and manage work during a crisis situation.

"Risk Management Committee" means the group of committees appointed by the Board of Directors and acting as the Risk Management Committee of AIRA & AIFUL PUBLIC COMPANY LIMITED.

"Employee" means an employee of AIRA & AIFUL Public Company Limited working at the Head office or Branch/Booth. This includes any employee working at branches or temporarily off-site to engage in the Company's public relations activities or collect client information or other activities.

"Customer" means an ordinary person, data owner, deliverer and consent provider to the Company in personal information collection, storage and use in addition to those authorized for actions to be taken on behalf.

"Trade partner" means a person, groups of people or juristic persons engaged in business contacts with the Company as a trade partner, service provider or person who has juristic relations with the Company by any means.

"Third party" means a client, trade partner, contract partner or person who conducts transactions with the Company by any means, including any employee, representative, trade partner and contact of the aforementioned individuals in the entire chain of command.

"Important document" means a document related to service provision, transactions or other work of the Company regardless of whether it is a personal document, government document or other document containing specific information in the position or under the guardianship of the Company in the course of business activities.

"Information technology system" means a computer system or other system of the same nature composed of various components such as hardware, software, networks, databases, system developers, system users, associated employees and experts in the field, whereby all components function together to specify, gather, store and process data to create information and/or results or obtain information that support the organization in any way.

"Information" means something that conveys a meaning, story or facts, regardless of whether the conveyance is done by the nature of the thing or any means and regardless of whether or not it is made into document, file, report, letter, plan, map drawing, photograph, film, recorded image or audio format or saved by a computer, number series, decryption or any other means that cause the recorded material to appear. This also extends to personal information, financial information and facts about clients applying for loans and/or other related people or that the Company stores according to the meanings defined by this policy.

"Information system" means software or information created to save and store data.

"Backup Operations Center" means a facility designated for work activities during a crisis situation.

Clause 2. Every department directly involved in the implementation of this policy shall be responsible for the supervision, revision, inspection, monitoring and any and all other actions related to meeting business continuity management objectives in line with this policy.

Chief Executive Officer (CEO) or Vice President who are assigned by CEO will be the acting person in charge and in control of compliance to this policy, which includes examination and evaluation of rules, regulations, requirements, manuals and/or any practice guidelines created by related department in order to ensure the successful implementation of this policy by submitting requests for approvals to authorized persons in line with the Company's delegation of authority policy.

Rules, regulations, requirements, manuals, practice guidelines and/or contract specifications that contradict or conflict with this policy shall be unenforceable, and the activities described by this policy will apply instead. All announcements effective prior to the issuance of this policy shall remain effective to the extent that they do not contradict or conflict with this policy.

Clause 3. This policy applies to employees on every level, and, if any part of this policy affects business operations or the activities of third parties, CEO or Vice President who are assigned by CEO, as the acting person in charge of the implementation of this policy, and with advice from agencies with direct responsibilities, will inform said third parties of activities in line with this policy only as necessary and possible.

### Section 2

### **Advisory Committee**

Clause 4. There shall be a committee named the "Advisory Committee" composed of the Chief Operating Officer (COO) and Chief Financial Officer (CFO) of the Company and Senior Vice president in each work section to perform the role of a committee providing advice to the Chief Executive Officer (CEO) in making announcements and implementing the business continuity plan (BCP).

### Section 3

# Business Continuity Plan Working Group

Clause 5. There shall be a Business Continuity Plan Working Group composed of executives from each associated department. A person shall be designated to take direct responsibilities relating to risk management, situation and damage assessment, security and preliminary situation mitigation, medical activities, human resource management, public relations, information technology management, and Company business and branch network operations, and CEO or Vice President who are assigned by CEO shall serve as the chairperson of the Business Continuity Plan Working Group, whose position serves an important role in summarizing and reporting results of situation assessments and recommendations and giving opinions for the announcement of the business continuity plan (BCP) to the Chief Executive Officer.

Clause 6. The Business Continuity Plan Working Group shall have the following authority and duties:

- (1) Assessment of risks for potential situations and prioritization of the severity of each situation that might impact the Company, including assessment of likelihoods of occurrences of situations that will cause important transactions and work of the Company to be disrupted, in order to enable the setting of priority levels for work activities and resources to be deployed in the restoration of effective work activities with primary consideration to the knowledge and understanding about the Company's business activities.
  - (2) Assessment of impacts from situations that impact the following:
    - (a) People
    - (b) Business
    - (c) Important documents
    - (d) Information
    - (e) Information technology system
    - (f) Place of business
    - (g) Service providers important to the Company, in cases where services cannot be provided

- (3) Specification of plans and measures for preventing crisis situations, for the business continuity plan (BCP), and for post-crisis-situation business restoration plans with primary considerations on preparations for dealing with crisis situations and business restoration.
- (4) Designation of a command center for the CEO, the Advisory Committee, and the Business Continuity Plan Working Group to hold command meetings during a crisis situation.
  - (5) Designation of a location to function as a backup operations center.
- (6) Giving advice and recommendations to company employees, high-ranking executives, Vice president, the Advisory Committee and/or people involved in risk management or impacted people.
- (7) Monitoring to ensure actual enforcement of the business continuity plan (BCP), training, testing, plan reviewing and plan checking to ensure improvements and revisions to keep up with changes and maintain consistent suitability with the complexity of transactions.
  - (8) Preparing business recovery plans after a crisis situation has occurred.
  - (9) Evaluating cost or expenses that may occur.
- (10) Coordinating public relations or explanations to related parties inside and outside the Company concerning business continuity management plans or anything else relating to crisis situations.
  - (11) Promoting the development of a business continuity plan (BCP)that is effective and sustainable.
  - (12) Building knowledge and understanding with employees in the business continuity plan (BCP).

Clause 7. There shall be a coordinator during a crisis situation to maintain contact and communication and ensure consistent thinking and understanding in terms of language and work cooperation, including time and activities to be carried out to meet objectives in a harmonious manner, to ensure smooth progression of work without overlapping work and without conflicts during times of crisis.

### Section 4

# Business Continuity Plan (BCP)

Clause 8. The criteria, methods, procedures and details for the business continuity plan (BCP) have to be set to support or facilitate the restoration of work activities to normal or near normal in a short time period, whether through repairs, enhancements or new creations of work systems or utility systems from those damaged in order to facilitate the return of normal business activities. These specifications must be clear, precise and uncomplicated and must cover every significant transaction of the Company as well as all primary service providers involved.

Clause 9. Criteria, methods, procedures and details of the business continuity plan (BCP) that are specified in addition to this policy shall continuously be according to the Business Continuity Plan Working Group's

announcements.

Clause 10. There shall be training in the business continuity plan (BCP) to practice and develop understanding

in the duties of each work section, details and procedures to be followed, along with reporting of various incidents,

with focus on ensuring understanding and effective implementation by employees.

Clause 11. There shall be testing of the business continuity plan (BCP) accompanied by evaluation of test

outcomes. Such a test or drill is to occur at least once annually and must involve testing from the first to the final

processes in a realistic simulation setting. In cases where that is impossible, only test or drill in the parts that are

possible.

Clause 12. The business continuity plan (BCP) shall be revised so that it always remains current and keeps up

with present situations with consideration to current crisis situations, business continuity plan test evaluations and

situations that might occur in a given time period. In doing so, a proposal shall be made to the Company's Risk

Management Committee for consideration of approval of any improvements, revisions or changes to significant

clauses of the business continuity plan (BCP).

Clause 13. There shall be reviews, improvements and revisions of the business continuity plan (BCP) conducted

by the Internal Audit Department in order to ensure that the plan can actually be implemented and remains

current. The department will also have to perform evaluations to ensure that the plan concurs with and supports

the Company's policies and business activities.

Clause 14. In cases where faults are discovered during testing or drills of understanding, the Business Continuity

Plan Working Group shall prepare a report summarizing the problems encountered and present it to the Chief

Executive Officer (CEO) for acknowledgement in order to subsequently make improvements, revisions or changes

to the business continuity plan (BCP) and quickly correct said faults or within 30 days after receiving approval to

do so.

If corrections of said faults cannot be implemented successfully according to the time period stated in the

first paragraph, the Business Continuity Plan Working Group shall report to the Chief Executive Officer in order to

request for an extension for as long as it takes to complete the aforementioned actions.

Section 5

Continuity Management

Clause 15. The criteria, methods, procedures and details in managing the continuity of each work section shall

be according to announcements made by the Business Continuity Plan Working Group.

The severity levels, crisis situation levels for each situation, business impacts, and potential damage to business, products and/or services are to be according to announcements made by the Business Continuity Plan Working Group.

Clause 16. The Business Continuity Plan Working Group shall specify the prioritization of information and documents sorted by information and document types, consider storage methods of information and documents, arrange backups of information and documents, prepare information recovery and damage prevention systems or document losses prevention systems.

Clause 17. While the business continuity plan is declared for implementation, the scheduled time period for restoring normal work activities shall be according to announcements made by the Business Continuity Plan Working Group with consideration to the crisis situation; business activities; safety to life, body and property; environmental circumstances, key factors, and surroundings that directly influence or are significant to employees and business activities, and the schedule is to be announced via appropriate channels to achieve general knowledge among employees.

### Section 6

# Incident Reporting Process during a Crisis Situation

Clause 18. The Chief Executive Officer, with the advice of the Advisory Committee and the Business Continuity Plan Working Group, shall have the authority to give orders and declare the business continuity plan (BCP) for use.

The Marketing & Planning Department shall be responsible for monitoring situations, giving press releases and announcing current situations along with crisis situations in a timely manner as well as be responsible for publicizing announcements made by the Committee via appropriate channels for employees to have knowledge about news, information, announcements, and/or schedules.

The Business Continuity Plan Working Group shall issue measures in public relations to prevent panic in employees and related personnel inside and outside the Company by strictly using communication channels in specified by the Business Continuity Plan Working Group in announcing news and information to employees on every level.

The company has established a communication process with both internal and external stakeholders, which is aligned with the specific impacts that occur. This process is outlined in the Call Tree

Clause 19. When a crisis situation occurs, CEO or Vice President who are assigned by CEO shall be responsible for reporting on the situation, coordinating work, reporting progress, publicizing and/or requesting assistance, in cases where necessary, for department involved in governmental supervision, as necessary and relevant, with

consideration to employee welfare, policies, and the importance of information and/or trade secrets, whatever the case may be.

### Section 7

# **Backup Operations Center**

Clause 20. There shall be a Backup Operations Center that is not at the same location or near to the location where a crisis situation occurs. The Backup Operations Center has to be located reasonably and appropriately far away from where the crisis situation occurs, in order to ensure the safety of the Company's employees.

Clause 21. The Backup Operations Center must be equipped with appropriate and sufficient resources required for operations, work volumes, personnel, employees and duration of the crisis situation and must include basic essential amenities for living and/or travel for work operations.

Clause 22. The Human Resources Department shall coordinate with the Information Technology Department, the General Affairs Department and/or other related departments in reporting the amount of required resources that human resources can utilize and in preparing reports for missing or lost resources, and in setting time periods for when resources are sent to the Backup Operations Center during a crisis situation and present such reports to the Business Continuity Plan Working Group for consideration of approval according to procedures.

Clause 23. The Business Continuity Plan Working Group shall set clear procedures relating to transfers of personnel and resources or announcements for the establishment of the Backup Operations Center.

# Section 8

# Post-Crisis-Situation Business Recovery Plan

Clause 24. The Business Continuity Plan Working Group has to arrange for the existence of a business recovery plan after a crisis situation and summary report relating to the impact-causing crisis situation containing at least the following details:

- (1) Losses in regards to casualties and/or deaths of employees
- (2) Damage to buildings
- (3) Damage to assets and/or equipment and tools used in work
- (4) Damage to basic utilities
- (5) Damage to business
- (6) Damage to business trade partners
- (7) Damage to the information technology system

Clause 25. The post-crisis-situation business recovery plan must include considerations to the following factors:

(1) Psychological rehabilitation

(2) Recovery and/or healing for employees who suffer from injuries and/or deaths. For employees injured, missing or dead, create a list of injured, missing or dead persons, and report said information to related personnel according to work sections and to the relatives of said employees upon the first occasion when notification is possible.

- (3) Recovery from damage to buildings and facilities
- (4) Recovery of assets and/or equipment and tools used in work
- (5) Recovery from damage to basic utilities
- (6) Recovery from business damage
- (7) Recovery of the information technology system

Clause 26. The Business Continuity Plan Working Group shall urgently create a report on the outcome of post-crisis-situation recovery and send an evaluation of the post-crisis-situation recovery outcome to the Chief Executive Officer for acknowledgement.

After a crisis situation has passed, the Business Continuity Plan Working Group shall evaluate the outcome of the post-crisis-situation recovery by checking to determine whether or not procedures and processes occurred in accordance with the set plan and by expressing opinions for making improvements to the post-crisis-situation recovery plan in order to enhance plan effectiveness and recovery capabilities in a manner that is applicable to potential situations that might occur in the future.

The Business Continuity Plan Working Group shall monitor the outcome of recovery by quickly testing and evaluating the capabilities, effectiveness and/or readiness in line with the recovery plan in the first paragraph, whether by complete evaluation or by random sampling, in as much as the situation facilitates and allows.

# Section 9

# Business Continuity Management Policy Review

Clause 27. The risk management unit is responsible for reviewing, revising, or amending this policy as necessary and in response to changing circumstances. The updated policy is then submitted to the Compliance department and the Legal department for review before proposing it to the company's board of directors for approval. Additionally, It is required to conduct a review of this policy at least once a year.

In the event of significant changes in the related environment that necessitate a review of the management and/or the amendment of the Business Continuity Management policy before the scheduled annual review, urgent modifications may be proposed and presented for approval according to the company's regulations.

# Clause 28. Records of Amendment

# Records of Amendment/Adjusted Content

Revision	Effective Date	Amended/Adjusted Content	Page
no.			
1	16 December	Amended C. Scope of Enforcement in the third paragraph	2
	2021	Amended and added Chapter 1 General Articles as follows;	4
		- Clause 2	
		- Clause 3	
		Amended and added Section 3 Business Continuity	5
		Management Committee, Clause 5	
		Amended and added Section 6 Incident Reporting Process	8
		during a Crisis Situation, Clause 19	
2	26 March 2024	Amended and added Section 1 General Articles as follows;	3
		- Name of clause 1	
		- Definition "Business Continuity Management Committee" to"	
		Business Contunuity Plan Working Group"	
		- Definition "Risk Management Committee"	
		Amended and added Section 3 Business Continuity Plan	5-6
		Working Group	
		- Name of Section 3	
		- Clause 5	
		Clause 6 no. (4) and (10)	
		Amended and added Section 4 Business Continuity Plan (BCP)	7
		- Clause 9	
		- Clause 12	
		- Clause 14	
		- The last paragraph of section 4	
		Amended and added Section 5 Continuity Management	7-8
		- Clause 15	
		- Clause 16	
		- Clause 17	
		Amended and added Section 6 Incident Reporting Process	8
		during a Crisis Situation, Clause 18	
		Amended and added Section 7 Backup Operations Center	9



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Revision	Effective Date	Amended/Adjusted Content	Page
no.			
		- Clause 22	
		- Clause 23	
		Amended and added Section 8_Post-Crisis-Situation Business	9-10
		Recovery Plan	
		- Clause 24	
		- Clause 26	
		Added Section 9 Business Continuity Management Policy	10-12
		Review	

AIRA & AIFUL Public Company Limited

Dated 26 March 2024 (B.E. 2567)