



AIRA & AIFUL Public Company Limited

90 Cyber World Tower Bldg., B33rd/ B34th Floor, Ratchadapisek Rd., Huai Khwang, Bangkok 10310
Registration Number: 0107557000489
Website: www.aira-aiful.co.th

Market Conduct Policy

(Revision B.E. 2567)

Aira & Aiful Public Company Limited



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Aira & Aiful Public Company Limited

A. Rationale

AIRA & AIFUL Public Company Limited, hereinafter referred to as "Company", is a non – bank financial business operating personal loan which a financial services provider has to manage customer service responsibly, with honest, and to operate the company in accordance with good corporate governance principles such as nobility, transparency and fairness. Company Board of Director, Executives and every Employee have responsibility for compliance with this policy.

Company recognizes the importance of sincerely providing customer service, not taking advantage, giving advice that is appropriate and clear. Financial customer will receive fair prices for products and conditions, including customer service facilitation and customer problem solving. Company Board of Director has to set up Market Conduct Policy and informs Company employees in all levels to acknowledge and perform.

B. Purpose

This policy is designed to ensure that Company is fully aware of its operations and customer service under rights and duties of customers as financial consumers.

C. Scope

This policy shall apply to Company Directors, Executives, and employees, including persons or entities who are related to Company.



Chapter 1 General Provision

Clause 1 In this policy

"**Company**" means AIRA & AIFUL Public Company Limited and also shall include its branch office.

"**Customer**" means a person who uses Company product, and also includes a contact person for Company product inquiries. Those who acknowledge Company product through media in various channels, and those who have been offered or recommended by Company to purchase products, however; customer that company has to be cautious when contacting and providing services, such as an older person aged 60 or over, a person who has no experience with the product, a person with limited communication or judgment like those people with hearing impairment or visual impairment or health impairment, this shall be categorized as vulnerable customer.

"**Products**" means all types of financial products and services that Company provides, advises, or sells.

Chapter 2 Culture and Organization Structure

Clause 2 The Board of Directors, the Executive Committee, and executives at all levels promote and value providing fair services to customers tangibly and effectively by providing policies, guidelines, and regulations including serving as an exemplar in providing fair service to customers. The roles, duties, and responsibilities of the directors, executives, and those responsible for related work are clearly defined. Additionally, ensure that personnel and tools for operations are adequately prepared, and continuously develop the knowledge and capabilities of the staff.

Clause 3 The Company communicates within the Company about how seriousness of its fair service, set up a working group assigned by the Chief Executive Officer to regulate fair service. Company also requires appointing responsible person for internal control, compliance and internal audit Company operation related to fair treatment of customer service, considering the principle of appropriate checks and balances.

Clause 4 Monitoring and controlling the overall business to be in line with the Bank of Thailand Notification Re: Regulations on Market Conduct, such as regularly reporting to the Board of Directors and/or the Audit Committee on issues related to complaint trends, customer opinion and satisfaction surveys, mystery shopping results, and compliance reports. The operations must be managed and controlled efficiently to comply with the specified direction and time frame.



Chapter 3

Product Development and Client Segmentation

Clause 5 The Company has a product development process by relevant departments. The Company management is concerning to the best benefit of the customers and selects products that are proper for customers' needs, customers' financial ability and the understanding of targeted customers.

Clause 6 The Company encourages employees involved in product sales to understand the Company's products, communicate clearly with customers, and enhance the capabilities of employees involved in sales.

Clause 7 The Company has sales process, control system, compliance and Internal audit that can support product sales for quality and efficient, including improvement and development of product quality.

Clause 8 In the case that the company does not develop the product itself There must be a detailed analysis of the product (Product Due Diligence) by evaluating the characteristics, conditions, and risks of the product with a thorough understanding. If the company considers that there is insufficient information to analyze the details of the product. The company must refuse to serve the product.

Chapter 4

Remuneration scheme

Clause 9 The Company has control over the sales process to prevent selling or giving advice that is of poor quality and irresponsible to customers (Mis-selling). In this regard, Company salesperson must have the appropriate knowledge and qualifications to advise or offer to sell the Company's products to customers.

Clause 10 The Company has an independent unit to review and evaluate the quality of service provided to employees who are related to product sales. The Company Sales kits must be accurate, clear, and fair.

Clause 11 The determination of the compensation structure of related employees must consider the principle of market conduct significantly. The measures to warn and punish related employees must be strict and appropriate, including an assessment of the risks that may arise from the compensation structure and from the use of continuous warning and punishment measures (On-going).



Chapter 5 Sales Process

Clause 12 The Company specifies the procedures in the sales process completely, clearly, and appropriately to the type of Company products and sales channels.

Clause 13 The Company's customers must be offered without disturbance of customer's privacy, without overrated information, without distorting, with adequate information for decision-making process and accurate understanding of Company products as well as with sufficiency to continue to use the service. Company's customers shall receive right products in accordance with their demands, financial abilities, and understandings of financial products.

Clause 14 The Company complies with the Bank of Thailand's regulations regarding the disclosure of interest rates, fines, service fees, fees, and other expenses, including product notification that the customer has to pay or will be charged before the due date.

Chapter 6 Communication and Training Program

Clause 15 The Company has systems and tools to communicate with employees at all levels who are related to provide services to customers. Company makes employees aware of the importance of fair service, and sales training is provided to sales staff for adequately knowledgeable and skillful operation and customer service fairly and practically.

Chapter 7 Data Privacy

Clause 16 The Company must maintain the security of customer data, take into account customer privacy and have appropriate security measures in accordance with generally accepted international standards and the measures of regulator, and under **the framework of 3 important principles: 1. Confidentiality of systems and data 2. Integrity of system and data 3. Availability of Technology** to maintain the security of customer data and disclosure of customer data to external parties, including prevention of loss, access, use, change, modification, or disclosure of personal data without authority or improperly.

Clause 17 The Company must have a process to ensure that the recipient of the data can maintain the security of the data concisely, store customer data only as necessary, use the data for the purposes notified to the customer, without disturbing privacy, and establish measures to control and prevent data leakage, control access to the work system, manage user rights according to the necessity of use and the level of risk to be up-to-date and consistent, including supervision and inspection of employees who are responsible for internal data that may be used inappropriately.



Chapter 8 Problem and Complaint

Clause 18 The Company specifies complaints channels and informs customers about the way to report problems or complaints clearly. Moreover, Company sets process to track problems and complaints which is clear, fast, free, efficient, and fair.

Chapter 9 3 Lines of Defense

Clause 19 The Company has management in providing services to customers. There is a process, control system, compliance, and internal audit. that considers providing services fairly and concisely detect risks and abnormalities to effectively prevent damage.

Clause 20 Establish that there must be control, compliance, and internal audit (3 lines of defense) in every system of Market Conduct. It covers each level of operations. To comply with the regulations and internal operating regulations related to Market Conduct according to the principles of control, compliance, and internal audit (3 lines of defense), the operators who monitor and audit will be independent from the activities being audited, have an understanding and are precise in control, promote and push for effective control, participate in providing opinions on the Company's operations, and report the results of compliance and audit to the Board of Directors or the Audit Committee or the assigned committee, and propose methods for improvement and correction for consideration and action as deemed appropriate.

Chapter 10 Operation and Business Continuity

Clause 21 The Company specifies plans to support operations for both normal situations and emergency cases. Company builds confidence that customers' commands and demands shall be provided correctly, completely, and timely, and the Company able to serve customers continuously and fairly.

Clause 22 Record of Amendment

Revision no.	Effective date	Amended/Adjusted Content	Page
-	23 Jan 2019	First Establishment	
1	7 Nov 2024	Improve the format to comply with the Company Documentation Manual.	1-9



Revision no.	Effective date	Amended/Adjusted Content	Page
		Chapter 3 Product development and customer grouping Add Clause 8 to be complete according to the Bank of Thailand Notification Re: Regulations on Market Conduct	3
		Chapter 7 Data Privacy Revised and updated to Clause 16 and 17 to be complete according to The Bank of Thailand Notification Re: Regulations on Market Conduct	
		Add Clause 20 Record of Amendment	5
		Add Appendix Measures regarding disclosure of customer data to other parties according to The Bank of Thailand Notification Re: Regulations on Market Conduct	7-9



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Appendix



Measures on disclosing customer data to other parties

1. Disclosing customer data to other parties for marketing purposes, to promote sales or publicize products and services (customers have the right to choose to give consent without affecting their consideration of using the product), the Company must proceed as follows:
 - 1.1 Request consent clearly in a form that assures customers that they are making their own decisions and that it is easy to understand that it is not a condition of using the product. The consent request must be clearly separated and there must be a wording at the top of the consent request form that it does not affect the consideration of using the product.
 - 1.2 Clearly state the purpose of requesting consent for marketing.
 - 1.3 Inform the list of recipients and the types of recipients for consideration of giving consent in the consent request form. In the case of companies in the financial business group, the company can refer to the list from other sources, such as websites, by clearly explaining the channels so that customers can access the information easily.
 - 1.4 If the list of recipients is added later (recipients of the type of recipients that have previously requested consent from the customer group that has chosen to disclose information), the list of recipients must be informed to customers in advance with sufficient time.
 - 1.5 Inform customers of the channels through which they can contact to inquire about the list of recipients and cancel contact from the recipients, or in the event that customers wish to cancel or withdraw consent, there must be a channel through which customers can conveniently contact them and proceed to cancel or withdraw consent for customers as soon as possible. Including informing all data recipients of the cancellation or withdrawal of consent.
2. Disclosure of customer data to other parties for purposes other than marketing shall be carried out as follows:
 - 2.1 Disclosure of customer data for **contract basis** between the Company and the customer may be specified as part of the terms of service request by identifying the purpose of disclosure of data and the types of data recipients to the customer, such as disclosure of data to outsourcers to conduct debt collection, etc.



- 2.2 Disclosure of customer data for **legal obligation basis**, the Company must inform the customer of the purpose of disclosure of data and the types of data recipients, which may or may not be specified as part of the terms of service request.
- 2.3 Disclosure of customer data that the Company is not required to disclose, and which does not affect the Company's services
- (1) The Company must not specify the disclosure of such data as part of the terms of service request. However, if the Company intends to disclose such data, it must obtain consent from the customer, giving the customer the right to choose to disclose the data clearly, and must specify the purpose of disclosure of data and the types of data recipients to the customer, such as disclosure of data to other parties for research or statistical data.
 - (2) Provide a convenient channel for customers to contact in case the customer wishes to cancel or withdraw consent and proceed to cancel or withdraw consent for the customer promptly, including informing all data recipients of the cancellation or withdrawal of consent.
 - (3) Disclosure of the above customer data This does not include cases where customer data is disclosed to external service providers (outsource/agent/business facilitator/subcontract) to allow such persons to perform tasks assigned by the Company.