

**Market Conduct Policy  
B.E. 2561**

**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** Board of Directors, Executive Committee and all levels of management promote and focus on providing services to customers fairly and effectively by established policies, guidelines, regulations and roles and duties of Company Directors and Executives who are related to customer services for fair treatment.

**Clause 3** 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 to appoint responsible person for internal control, compliance and monitoring Company operation related to fair treatment of customer service.

**Clause 4** Company monitors and controls overall Company business in accordance with Bank of Thailand guidelines of fair and efficient services such as reporting to Company Board of Directors and/or Audit Committee regularly about issues concerning to customer complaint trends, customer satisfaction surveys, Mystery Shopping and Compliance Reports.

### **Chapter 3 Product Development and Client Segmentation**

**Clause 5** Company has a product development process by relevant departments. 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** Company pushes Company employees who are involved in product sales to understand Company product details to be able to communicate with customers clearly and to increase the ability of the employees who are involved in sales.

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

### **Chapter 4 Remuneration scheme**

**Clause 8** Company has sales process control to prevent sales or advice that is lacking in quality and lack of customer responsibility (Mis-selling). Company Sales staff must be knowledgeable and adequately qualified to provide advice or to sell products to the customers.

**Clause 9** Company has an independent unit to review and evaluate the quality of service provided to employees who are related to product sales. Company Sales documents or sheets must be accurate, clear and fair.

**Clause 10** Determining the structure of compensation for related employees by taking the principle of fair service into Company accountability. Warning measurement and punishment of related employees shall be strict and appropriate. Structure of compensation, warning and on – going punishment should take risk assessment in consideration.

### **Chapter 5 Sales Process**

**Clause 11** Company specifies the procedures in the sales process completely, clearly and appropriately to the type of Company products and sales channels.

**Clause 12** 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 13** 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 14** 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 15** Company has confidentiality policy, procedures and system for protecting customer information confidentiality by taking customer privacy and confidentiality into Company accountability.

## **Chapter 8 Problem and Complaint**

**Clause 16** 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 Defence**

**Clause 17** Company specifies internal control process and examination process to review Company operation, supervise and monitor customer service management fairly and concisely in accordance with Bank of Thailand regulations.

## **Chapter 10 Operation and Business Continuity**

**Clause 18** 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 Company able to serve customers continuously and fairly.

AIRA & AIFUL Public Company Limited  
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