



AIRA & AIFUL Public Company Limited

319 Chamchuri Square Building, 22nd Floor, Phayathai Road, Pathumwan, Bangkok 10330
Registration Number: 0107557000489 Website: www.aira-aiful.co.th

**AIRA & AIFUL PUBLIC COMPANY LIMITED
CODE OF CONDUCT B.E. 2561**

ฝ่ายกฎหมาย
Legal an



- Unofficial English Translation -

Message from Chairman

This Code of Conduct is designed to ensure that the management and operation of the Company are ethical and consistent with good corporate governance and ethical principles. In addition, the Board of Directors is responsible for overseeing the business operations of the Company and its subsidiaries, as well as for corporate governance and business ethics, and to ensure the confidence of all Shareholders both internal and external

The Company is committed to work with integrity, transparency, friendliness and fairness to all sectors of our Employees, at all levels of our Customers and related persons, in order to be the superiority in the provision of personal loan services, responsible for the society and the public in order to grow as a leading organization with credibility, development and innovation for security and sustainable of the business.

This Code of Conduct is good behavioral patterns that all level of Employees of the Company should respect and keep in mind as a guideline for their conduct in order to maintain good corporate ethics for the long run of business coordination and mutual benefits in all sectors.

Mr. Wichian Mektrakarn
Chairman
February, 2018



- Unofficial English Translation -

Rationale

AIRA & AIULF PUBLIC COMPANY LIMITED "Company", a personal loan service provider with a vision of being the fastest growing of personal loan Company in Thailand, along with growth efficiently. Encourage participation in society through corporate activities, sincerely according to its corporate values.

The Company recognizes the importance of business ethics is to be the main tool for enhancing business of the Company to be honest, ethics, transparent and align with the principles of good corporate governance for confidence in the people involved the Company.

The Company Core Values compose of the Sincerity, Effort, Reliance and Gratitude in which the Board of Directors, Managements and Employees at all levels consider as important and respect to comply. To manage the work in accordance herewith and mutual values encourage to positive behavior. The Company also promotes Corporate Social Responsibilities: CSR activities for Employees to acknowledge sacrifice to society and return the benefits to it at all opportunity and at all channels appropriately. That is the one of the intentions is to be grateful to the society.

With the Code of Conduct hereby, is determined to be an important tool for the Company to develop fair business that will implant good values, best practices, and provide Employees with a positive attitude toward work ethics and good attitude towards society entirely. The benefits of this Code of Conduct are also enhanced to adapt to the lifestyle to achieve mental sustainability and strengthen the good morals in society, work in the Company and for the society in general henceforth.



- Unofficial English Translation -

Table of Contents

Contents	page
Message from Chairman	1
Rationale	2
Vision Mission and Corporate Values	5
Main Policies	
1) Equitable Treatment of Stakeholders	5
• Customer service, quality and service of the Company	5
• Responsibility for Shareholders	6
• Treatment for Employees	6
• Employee's Practice and the treat to other Employees	6
• Treatment for Partners or Creditors	7
• Treatment of Competitors	7
• Corporate Social Responsibility	8
2) Conflict of Interest	8
3) Treatment and Utilization of the Company's Assets	9
4) Innovative and Intellectual Properties	9
5) Securities trading	9
6) Confidentiality and Disclosure of Company Information	10
7) Giving or receiving gifts or entertainment	10
8) Internal Control	10
9) Anti-bribery and Corrupt Corruption	11
10) Anti-money Laundering and Combating the Financing of Terrorism	12
11) Complaint Management	12
12) Monitoring to comply with the Code of Conduct	12
13) Human rights and labor	13
14) Others	
• Political neutrality	13
• Code of Conduct Review Period	14



- Unofficial English Translation -

Vision Mission and Corporate Values

Vision

To be the fastest grow of personal loan provider in Thailand.

Mission

Promote social participation through Company activities with sincerity.

Corporate Values

Sincerity, Efforts, Reliance and Gratitude

Main Policies

Article 1: Fair Treatment of Stakeholders

The Company give precedence to the fair treatment and equally to Stakeholders. Stakeholders mean Shareholders, Investors, Directors, Executives and Employees at all levels including groups of individuals who gain benefits or impact from the business both directly or indirectly. The Company promotes business operation in provision of fair business and good Corporate Governance.

งาน
ment

Customer service, quality and service of the Company

The Company delivers quality products that meet Customer expectations or above, under fair conditions.

The Company provides information of product and service correctly, adequately and timely to Customer in order to provide Customers with sufficient information for making decisions without exaggerate and/or hype no matter in which media or channel to prevent misleading Customer about the quality, features and conditions of the goods or products of the Company.

The Company provides services to all levels of the Customers equally without discrimination. The Company responds to Customer's needs with promptness, having proper channels for the Customers complaint about the product and service and encourage well perform, well management of services to the Customers on fair basis according to the policy of Customer service management.



- Unofficial English Translation -

The Company has a policy to protect personal information and confidential information of the Customers with none disclosure of personal information or confidential information to the use for own benefits or others without permission except under order of the Courts or Government Agency.

Responsibility for Shareholders

The Company operates its business with honesty and encourages the Executives, Directors and Employees to perform their duties with honesty and best practice to maintain the benefits of all Shareholders with fairness.

The Company shall report to its Shareholders on a regular basis with completeness of facts consist of future trends of the Company in both positive and negative with sufficient information and reasons.

Treatment for Employees

The Company gives precedence equally to all Employees in every job position and well provides fair compensation to Employees to ensure that Employees work in a safe working environment for safety of their life and their properties in order to provide better quality of life for Employees.

The Company operates its business complies with all applicable laws, regulations, orders and/or other requirements related to Employment, Termination, Pay Compensation, Welfare and/or the requirements of the labor law with fully defined and maintained. And to keep the Employees strictly comply with the said law and regulation.

Appointment, rotation, awards and punishments to Employees are rely on fairness, act in good faith and based on fair assessment covered knowledge, ability and suitability of Employees.

The Company gives precedence for learning and development of knowledge, abilities and skills of Employees consistently and thoroughly.

Employee's Practice and the treat to other Employees

The Company encourages its Employees into good behave, act in the right way, perform their duties with earnestness, integrity, transparency and straightforward. The Company does not encourage for giving gifts value to supervisors or receiving gifts value from subordinates for the purposes of misconduct or for omit any perform under the Company's rules, regulations or for any other misconduct benefits whether owned by self or others.

ฝ่ายกฎหมาย
Legal and



- Unofficial English Translation -

The Company encourage Employees to respect to human rights among Employees at all levels and encourages them to act as a good example for others to be respectful.

The Company encourages Employees to be disciplined, comply by laws and/or regulations of the Company, good moral of society whether it is written or not.

The Company encourages Employees to respect unity in general and mutually create a good atmosphere for Employees, none practice or any doing may result damage of reputation of the Company or negative impact or may cause consequential problems against the Company.

Treatment for Partners or Creditors

The Company treats to Partners and/or Creditors equally and fair. The return on business relations is based on legally benefits, fair and transparent from both sides.

The Company abides by contractual obligations or conditions agreed upon and between Partner and/or Creditors. And promote the juristic act with evidences to ensure that both sides strictly comply by the terms and conditions thereof strictly. If any of the conditions unreachable, it is to be notified to the other party for mutually find solutions.

The Company negotiates to its suppliers and/or Creditors in a transparent, honest, and fair with verifiability. The Company fully antis the corruption, call for or willing to accept or accept bribes or any other unlawful, dishonest, or non-transparent benefits. And if the suspicious case were found, the Company shall support information to the Partners or Creditors to share and immediately stop such action.

Treatment for Competitors

The Company operates its business under the rules of good competition, honesty, none exploitation or sabotage or caused damage to reputation of Competitors or other aspect of the abuse or providing defamed information or acts as dishonesty to Competitors

The Company denies acquisition of confidential information of Competitors and does not seek the information from worker of Competitors with dishonest or improper business matter.



- Unofficial English Translation -

Corporate Social Responsibility

The Company shall not perform any act which violates laws, rules or regulation of the country and society by citing such act is to intend to increase profits for the Company.

The Company carries its business with responsibility and attends taking care of environment, traditions and ethics of the society.

The Company encourage sustainable and consistent participation in society, community around the area of the Company and remote communities for better quality of life, including self-directed activities and/or collaborating with community agencies or between communities, and/or by cooperating with the government agencies and / or other private sector to share or develop the community entirely.

The Company encourages quick responsive and effective if found business operation took place impact to society and the community in general by cooperation with both of Government sectors or private sectors or relevant sector to eliminate the problem effectively.

Article 2: Conflict of Interest

The Company gives precedence to the interests of its Stakeholders equally as well as to the interests of the society in order to promote fair business. The Directors, Executive and all of Employees must be neutral and take into account of the interests of the Company, Stakeholders and Public by avoiding any actions contrary to the interests of the Company whether by or from contacts with relevant persons such as Partners, Customers, Competitors or other prospects, dishonesty or by occasion or information obtained from being Directors or Employees for exploitation. And none perform any business to compete with the Company or work other which significant impact to the job.

Any privacy exploitation that may gain or involve the Company's operations should be avoided, whether involve to what level of Stakeholders of the Company or in whatever channel and avoid receiving benefits or any compensations from the exploitation of the Stakeholders and avoid shareholding or having an interest or business benefits from Competitors' Company cause to the results to perform or ignore any action with wrong doing or impact on the job responsibilities.



- Unofficial English Translation -

If the Directors, Executive and all of Employees hold shares or having their interests in a competing company prior to be employed or prior to the Company entered into the business or from inheritance, the Directors, Executive and all of Employees must report to their supervisors or the Company.

Article 3: Treatment and Utilization of the Company's Assets

The Company encourages the use of its assets to get the full benefits and effective to the operation of the Company. The Directors, Executive and all of Employees have duty and responsibility to take good care of the Company's asset prevent to be damaged, lost or damaged by misuse and must not use for own benefits or other benefits illegally either directly or indirectly.

The Properties means shaped as movable property, unmovable property, machinery etc., and also includes non-physical assets such as technology, technical knowledge, patent, copyrights and business trade secrets which non-published such as business plans, financial projections and human resources information etc.

Article 4: Innovative and Intellectual Properties

The Company promotes innovative ideas, encourages Stakeholders to respect intellectual properties and do not act as violation thereof whether copyright, trademark, patent, trade name, trade secrets, knowledge, processes or any other intellectual properties as well as maintain or register intellectual property right legally.

Article 5: Securities trading

The Directors, Executives and Employees must avoid using internal information for their own benefits, to trade their shares or provide internal information to other people improper use for the benefits of trading to the Company.

The Directors, Executives and Employees must report trading securities of the Company in order to prevent the trading shares by the use of internal information and to avoid any inconsistency with respect to the insider trading.

The Directors, Executive and all of Employees should refrain from trading shares of the Company at a time prior to the release of the financial



- Unofficial English Translation -

statements or publish the status of the Company including publish other important information.

Article 6: Confidentiality and Disclosure of Company Information

The Company encourages data protection policy and having provision to disclose legally, to prevent unauthorized use of Company information which caused conflict of interests or aside benefits from the improper use of the information of the Company.

The Company gives precedence to the internal information of the Company and of Stakeholders as utmost importance and classified as secret of the Company, encourages protection, retention, use, disclosure and/or transfer of information between the Company and Stakeholders and having policy to manage the information of the Company and Stakeholders which provided in order to prevent using or any wrongful act.

The Directors, Executive and Employees must avoid using information, disclosure or the use of confidential information as strictly prohibited.

Article 7: Giving or receiving gifts or entertainment

The Directors, Executives and Employees must not accept or solicit gifts and/or other benefits unreasonable and inappropriate from the Company except for occasional festivals or generic traditional which people treat each other, only receiving with no affect toward business decision.

Giving or receiving gifts may available on publicly, with transparency or do in public and should not be high valuable gift or in cash or cash equivalents.

In the case of the Directors, Executives and Employees receive gifts or presents on generic traditional occasion exceeding the value setting or excess business norm, the Employees must report to the supervisor in order.

Article 8: Internal Control

Internal Audit

The Company has an independent internal audit process, having its function to monitor the operation, evaluate and make suggestions for improving the process under the supervision of an Internal Auditor, review by the Audit Committee.



- Unofficial English Translation -

The Company has clear internal audit approach in order to verify the business units of the Company to comply with the standards effectively without contradict or contrary to laws, rules, regulations, announcements or other from Government Agencies and the business units must be inspected per annum.

Risk management

The Company has risk assessment, risk report, risk review, follow-up, operation risk and other related within the organization including verification of solution to control being acceptable risk according to appropriated standards.

Financial Reporting

The Company is responsible for accounting rely on Thai Accounting Standard: TAS and complete financial reports duly prepared rely on Thai Financial Reporting Standards (TFRS) and disclosure of financial reports statutory.

Article 9: Anti-bribery and Corrupt the Corruption

The Company operates its business transparently and discloses sufficient information in accordance with the laws and regulations of the regulatory authorities to ensure reliability and verifiability and does not encourage any action that may imply a commitment to a call for or receipt of a bribe to make an unfair decision or for business purposes whether for own or for others.

The Company does not offer or give gift or any benefits to the Government Agency for any help to facilitate the duty or expedite any performance or service faster than it should be in consider with inappropriately use of authority.

The Company does not support any businesses that require bribes or corruption and do not promote or binding transactions with Company or organization that interfere with or get involved with bribery and/or corruption or behavior likely such action either directly or indirectly.

The Company antis the corruption or misbehave in every channel and having its anti-corruption policy by the cooperation of the Directors, Executives and Employees at all levels of the Company to no receive, no give or no accept for bribery in any form of benefits or any other personal interests



- Unofficial English Translation -

unlawfully, including no assigns or allows others to do so, on behalf or instead of the Company. Unless the benefits provided to the Company comply with the trade practice, marketing promotion and campaign or considered as norm of marketing business legally.

The Directors, Executives and Employees of the Company must cautious in performing their duties to not involve or support any bribery action or any corruption activity or receive money or other properties illegally from relevant person which lead to work inappropriately.

Article 10: Anti-money Laundering and Combating the Financing of Terrorism

The Company has policy to operate the business by complying with the Anti-Money Laundering laws to not get involved in any transactions that believed avoiding legal practice or considered as suspicious transactions.

The Company antis all transactions which support financing to the terrorisms by no transfer, changing or converting property derived from the offense, or use or commit in an offense or for misdoing of the occupation related to the offense under the law related such matter.

The Company cooperates with relevant Government Agencies to monitor, reports and/or complies to requirements to achieve the objectives of Anti-Money Laundering and Combating the Financing of Terrorism when the suspicious transactions were to be founded.

Article 11: Complaint Management

The Company encourages proper channels for Customer's complaints and Stakeholders' complaints by proper specific function with proper process to handle Customer complaint under requirements of the regulator specifically.

The Company encourages proper channels to receive complaints from the Directors, Executives and Employees and announce to the Directors, Executives and Employees in general for the benefits of using as the channel to receive complaints by concealing information about the complainant and sourcing or complaint for the safety of the complainant. The Company has a transparent, fair and verifiable process to manage complaint with clearly process and time frame.



- Unofficial English Translation -

Article 12: Monitoring to comply with the Code of Conduct

The Company announces Code of Conduct hereunder to the Directors, Executives and Employees throughout the Company and provides knowledge into corporate ethics and follows good moral practice usually.

The Company trains the Directors, Executives and Employees to perform duties with honesty, fairness, prudence (Duty of Care), and good ethics to promote the use of knowledge and ability to perform duties with integrity.

The Company encourages the Directors, Executives and Employees to comply with the law, policy and regulations strictly. The Company gives precedence on staff training to provide fast, fair and appropriate Customer service in order to achieve sustainable development of the Company's business and also the Directors, Executives and Employees within the organization.

Article 13: Human rights and Labor

The Company normal treats everyone equality with no discrimination grounds of differential origin, nationality, language, gender, age, disability, physical condition, status, position, religion and education. The Directors, Executives and Employees honor to each other and do not use personal feelings or prejudices in performing duties.

The Company promotes safety workplace by preventing the sexual abuse or harassment or nuisance to the Directors, Executives and Employees or misconduct of unlawful order of hierarchy or contrary with ethics or good morals.

The Company encourages strictly legal employment under requirements and principle of labor law. The Directors, Executives and Employees are equally committed to fairness and anti-human trafficking or using illegal labor.

Article 14: Others

Political neutrality

The Company maintains neutral in political. The Directors, Executives and Employees of the Company shall not get involve in financial support or other forms of support to political party, membership, Political Alliance, Political power and Political candidates neither directly nor indirectly at all local, regional or national levels.



- Unofficial English Translation -

The Company encourages the Directors, Executives and Employees to maintain their political neutralities and respect to the political rights of Employees and others, having free of expression in political ideas without violating laws or the rights of others, encourage to the use of political rights in the legal practice as a good citizen under The Constitutional Law and other relevant laws.

The Company does not encourage to the use of resources or the operating hours or the capital or assets of the Company to support activities that involve specific one political party or one of the major political groups.

Code of Conduct Review Period

Company is required to review this Code of Conduct annually.

August 6, 2018

AIRA & AIFUL PUBLIC COMPANY LIMITED

ปฏิบัติงาน
artment