

Maintaining Integrity

Allianz Ayudhya Assurance PLC is committed to place importance on integrity as main principle in conducting its business as the Company could foresee various problems may arise from dishonest conducts, will create negative impact and huge damage to the Company and society in many aspects, i.e. increasing the Company's operating expenses or deviating the Company's resources toward dishonest investment that may impact reputation and image of the Company or put the Company under legal proceedings, etc. Therefore, the Company has established policies as the basic practices for executives, employees, life insurance agents and related persons, i.e.

- **Code of Conduct for Business Ethics and Compliance**

The Company expresses obvious intention to every employee to realize the importance of secured, successful and sustainable business operation that based on the trust our customers, shareholders, all interested persons and public have in the Company's businesses in which conducted with honesty, transparency and fairness. Therefore, the Company has established the standard Code of Conduct for every employee to comply with and the purpose is to protect any doubt concerning honesty of the employees and the Company. The abovementioned basic practices consist of: principles of fair business conduct that in line with the rules and regulations, unbiased practices, protecting confidential information of the customer, measures to deal with conflict of interest, giving and accepting gift/invitation for entertainment, Anti-Corruption and Bribery, Anti-Money Laundering and Countering Financing of Terrorism, etc.

- **Sales Person Code of Conduct**

The Company's life insurance agent/broker is first individual who contacts a customer. Therefore, the Company has prepared the Sales Person Code of Conduct for life-insurance sales person for the life-insurance sales persons in every sales channel of the Company to comply with and to reflect the principles of practice with integrity of the life-insurance sales persons and the Company, i.e. showing the license of life-insurance sales person, identifying oneself to a prospect, customer confidentiality and providing correct, clear and fair information of products and services. The information should be sufficient for a customer in making decision to buy a product or to use a service of the Company, etc. Moreover, the Company has established the Ethics Committee to control life-insurance sales person in every sales channel to comply with and for mutual understanding in the standard code of conduct for business practice to a customer who contacts the Company and also to follow up, investigate and consider penalty against life-insurance sales person who does not comply with rules and regulations

and the standard code of conduct of the Company including rules and regulations, orders and related laws.

- **Anti-Fraud Policy**

The Company is sustainable by trust of our customers, shareholders, employees and all related parties. The Company will not tolerate any form of dishonest act as it is the threat to our resources and our honest business conduct. Therefore, the Company has established the Anti-Fraud Policy for every employee to comply with and to protect any dishonest act within the organization. Apart from defining the role and responsibility of anti-fraud for all executives, business units and employees, the Company has established methods and channels for “whistle blowing” to inform the Company.

- **Anti-Corruption & Bribery Policy**

The Company determines to comply with Anti-Corruption and Bribery Law, both locally and internationally. Therefore, the Company has issued Anti-Corruption & Bribery Policy as part of the effort to maintain strength and effectiveness to control compliance of the Company. And in order to successfully maintain trust of the customer, the Company will not tolerate any corruption and bribery within the organization. The Company has established “Whistle Blowing” procedure, principles in granting and accepting gift/business etiquette invitation, outsourcing, making payment and book keeping for the benefit of transparency and verifiability.

- **Gift & Entertainment Policy**

The Company realizes that granting and receiving gift, including sending and accepting invitation for entertainment are regarded as practical tradition to strengthen closer business relationship and also regarded as business practice provided that it is transparently and appropriately managed. Therefore, the Company has established the policy of granting and accepting gift/invitation for entertainment from a customer, business counterpart including authorities of government officer, in order to prevent any doubt concerning honest practice of the employees and the Company especially in the case there may be conflict of interest between personal interest of the employees and their responsibility to the Company, customer or the Company’s business counterpart or being regarded as offering or receiving bribe or conducting inappropriate business.

- **Anti-Money Laundering Policy**

The Company is determined to support Anti-Money Laundering and Financing of Terrorism Policy and does not want to be misused for any kind of money laundering or illegal activities. Therefore, the Company has announced the policy and established guidelines on Anti-Money Laundering and Financing of Terrorism including the principles of Know-Your-Customer and Customer-Due-Diligence to counter money laundering and financing terrorism in the Company's business which is one of the measures in preventing the Company to be involved or to be misused for any kind of money laundering or illegal activity.

- **Promote Compliance and Business Ethics**

For every level of employee, the Company aims to promote understanding to the principles and policies relating to Business Ethics and Compliance, including correct practices, handling and reporting a found or suspicious incident that may lead to illegal activity, against the rules and regulations or the policy of the Company or creating any doubt concerning honesty of the employees or the Company. Therefore, the Company organizes the relevant training courses, e.g. Code of Conduct Training, Anti-Fraud Training, Anti-Corruption & Bribery Training and Anti-Money Laundering Training. These are compulsory courses that every employee in every level needs to constantly attend and pass the test. New employee also needs to attend and pass the test on every course within probation period. New employee will not be permanent employee if they do not attend and pass the tests in the following courses:

- Code of Conduct Training: For employee to understand the principles and minimum standard they need to comply to prevent doubt concerning honesty of the employees and the Company
- Anti-Fraud Training: For employee to learn methods of preventing and reporting behavior that imply dishonest activities.
- Anti-Corruption & Bribery Training: For employee to understand problem and negative impact from corruption, offering and accepting bribe and learn methods of preventing and reporting behavior that imply corruption and offering/accepting bribe through channels
- Anti-Money Laundering Training: For employee to understand Anti-Money Laundering, reporting relevant activities prescribed by the law, Know-Your-Customer, know channels and methods that could be used for money laundering in life insurance business and learn the impact of money laundering on the Company, preventing and reporting suspicious activity to related internal unit.

- **Investigation of violation and reporting on suspicion concerning honest work practice**

The Company has established Whistleblowing Committee and provided channels to report complaint or clue of committing an offence. The purpose is to investigate the truth in case a clue is reported or any employee found to commit an offence, violate or break the law, rules and regulation, policies of the Company including the Employee Code of Conduct. Or in case an employee is in trouble as the result of abuse of authority or any violation in the workplace or any behavior that may spoil the reputation of the Company. The Committee consists of knowledgeable and experienced experts who treat all interested persons on fair basis. The Company also provides fact investigation based on the standard and inquiry process. The Company provides the measures to protect the employee who reports concern in good faith even if that concern eventually proves to be unfounded. The concern and the name of the reporter will be kept confidentially and will not be disclosed to the person who is reported to violate, in order to protect the employee to be slander or harmed. An employee can directly report the found or suspicious information of violation through their superior, the Compliance Officer or the Committee or report to the Committee by Anonymous Online Whistleblowing.

- **Penalty in case of violation**

The employee who breaks the law, rules and regulation, policies of the Company including Employee Code of Conduct will be penalized by disciplinary action determining from the intention, circumstance, result of an offence, cooperation in the investigation, action by the employee to correct and prevent that incident for re-happening. The disciplinary action to the employee may range from a warning up to the maximum disciplinary action which is dismissal.