



## **Market Conduct Policy**

### **EASY BUY Public Company Limited**

#### **1. Purpose**

This policy is intended to provide general framework for EASY BUY Public Company Limited (hereinafter referred to as 'Company') to strengthen measures toward fair and equitable market conduct and fair lending which is the basis for conducting the business in order to build trust and confidence among customers by presenting product and service correctly, completely, fair, and transparency treating all customers equally and providing assistance to customers and sustainable end-to-end process for lending so as to contribute to the further enhancement of customer benefit.

#### **2. Definition**

"Customer" means natural person and juristic person who currently use products and services of the Company, including those who inquire or acknowledge the products and services through any media, and those who have been offered or induced from the Company to purchase the products and services.

"Sensitive Customer" means customer whom the Company must contact carefully and treat specially, including people aged 60 and over, people with less financial knowledge or no experience in using financial products and services, or people with limitations in communication and decision such as person with hearing impairment, visual impairment, and health impairment.

"Products and Services" means all financial products and/or services that the Company issues, suggests, or sells, including products and services under supervision of other regulators such as debenture, mutual fund, non-life insurance, and life insurance.

#### **3. Basic Principles in practice**

3.1 The Company respects the customer and is committed to providing fair and equitable products and services to the customer, which suit with their needs, financial abilities and understanding.

3.2 The Company shall ensure that the customer can receive suggestion, advice and recommendation on its products and services adequately and without any disturbance, including clear and sufficient information with no exaggeration and twist, before/ during/ after sales so as to reasonably and efficiently make a decision on the products and services, such as selection, application, purchase and change.



3.3 The Company values the privacy and confidentiality of customer information and is obligated to responsibly use the personal data of customer, including gathering customer information legally and protecting the privacy and security of personal data.

3.4 The Company views the complaints and problems of customer as an opportunity to improve its products and services for the future, and shall fairly, equitably and professionally address the issues which the customer has raised relating to the products and services.

3.5 Directors, executives and employee have a responsibility to help ensure that the Company builds and maintains trust with the customer in terms of market conduct.

3.6 The Company places importance to fair lending management by providing prompt and timely assistance to customers who are facing debt problem including providing sustainable end-to-end process for lending loan by covering 1) Development and providing of loan products 2) Credit Risk management 3) Debt collection and debt collection fee 4) Supporting measures, debt restructuring and debt mediation 5) Litigation Process 6) Sell off or transfer debt to others.

#### **4. Scope of this Policy**

4.1 This policy applies to the directors, executives, and employees, especially to those who have a crucial role to play in providing fair and equitable products and services to the customer.

4.2 Directors, executives and employees shall comply with this policy and the rules and standards stipulated in the Notification of the Bank of Thailand (For Kor Ngor Wor 199/2563); Re: Management of Fair Customer Service (Market conduct) and the Notification of the Bank of Thailand (For Kor Ngor Wor 951/2564) Re: "Guideline for Fair Lending".

#### **5. Framework for Market Conduct Management**

5.1. Appropriate Oversight of Market Conduct by Board of Directors and Executives

5.1.1 Board of Directors

(1) To establish and develop policies, strategies, or plans on market conduct to clarify the significance of providing fair and equitable products and services to the customer.

(2) To concretely push forward for fair and efficient service to demonstrate the commitment together with to be a good role model for providing fair service to customer.

(3) To determine and allocate the roles and responsibilities of executives and department/ office in order to control the market conduct systematically.



(4) To develop and maintain an appropriate and adequate system to manage, supervise and monitor the market conduct in a manner suited to the actual state of sales operation and risks, including a system to enable appropriate communications and reporting to the Board of Directors especially when an irregular case related to the market conduct occurs.

(5) Any significant issue shall be reported to the Board of Directors without delay and the overview of insignificant issues shall be reported to the Board of Directors on a quarterly basis in order to review the policy and strategic plans related to Market Conduct.

#### 5.1.2 Chief Executive Officer or Executive Officer in Charge of Market Conduct

(1) To establish, develop and promote strategies, plans or internal rules on market conduct in accordance with this policy and the Organization Structure and Duty Policy.

(2) To delegate adequate and appropriate authorities and responsibilities to department/ office and push forward with fair and equitable market conduct practices. Also, to assign executive in charge of market conduct, and executive may assign working group for which such executive in charge shall chair, to enable overseeing the market conduct management effectively and efficiently.

(3) To enable Board of Directors to follow up and oversee the market conduct in time, for example, regularly delivering report to Board of Directors and/or Audit Committee on the following issues: complaint trends, customer opinion and satisfaction survey, result from mystery shopping and compliance report.

#### 5.1.3 Department/ Office

(1) To operate, manage, control and assess the fair and equitable customer service according to their duties and responsibilities prescribed in Organization Structure and Duty Policy. (Details are as Attachment 1)

### 5.2 Product Development and Customer Segmentation

5.2.1 To take into account the following factors/ operations in designing, developing and selecting products and services;

(1) Suitability with needs, financial abilities and understanding in the nature or condition of the product, including digital technology (digital literacy) of each customer segment, especially in sensitive customer segment;

(2) Fairness and equitability of products and services compared to the actual cost, such as condition, benefit, price and fee;



- (3) Necessity of other products and services that are provided in a way linked with main products and services;
- (4) Capability of sufficient communication with the customer in light both of sales channels and of sales staff's ability;
- (5) Effective and efficient measures to manage, supervise and monitor the sales process (three lines of defense);
- (6) Causes of products and services problems, including complaints, in the past;
- (7) Product due diligence in case the product or service is selected, which the Company does not develop by itself;
- (8) Grouping or classifying methods both of products and services and of target customer; and
- (9) Preventive measures to provide the products and services that are contrary to applicable laws or to conduct operations with risk or conflict of interest.

5.2.2 To develop and promote the examination by the related department/ office in designing, developing and selecting products and services, taking minutes, and being approved by responsible executive.

### 5.3 Remuneration Scheme

5.3.1 To set out remuneration scheme and disciplinary measures to the employee related to the market conduct, in which the quality of sales is given first priority, such as accuracy, clearness, and fairness of conditions and sales document.

5.3.2 To consider severely taking a disciplinary action against employees and executive in charge of market conduct in accordance with the extent of wrongdoing based on the Working Rules and Regulations.

### 5.4 Sales Process

5.4.1 To clarify and communicate the sales process to the sales staffs in a clear and appropriate manner by preparing systems, internal rules, trainings, and sales tools so that the sales staffs can easily understand what to do and what not to do on their roles and responsibilities.

5.4.2 To perform and manage Know Your Customer procedures to ensure verifying customer identity and knowing the needs, financial abilities and understanding of the customer so as to provide appropriate offer, suggestion, advice and recommendation to each customer of the target segment.



5.4.3 To refrain from sales of the products and services in case where sales staffs don't have sufficient knowledge and ability to explain the products and services to the customer, or where sales staffs received insufficient or suspicious information that makes them unable to identify the customer.

5.4.4 To ensure that the customer can receive sufficient information of products and services, including transaction information, through any channels.

5.4.5 To provide effective systems, tools and procedures to use the customer data responsibly and without any disturbance of customer privacy.

5.4.6 To regularly examine the sales quality in all channels to ensure that the sales operation is practiced with transparency, and no deception, no enforcement and no disturbance.

## 5.5 Communication and Training to employees

5.5.1 To determine department/office responsible for communicating with and educating all levels of employees by setting topic, content, pattern, communication method and assessment method, including set-up of proper time and frequency, and keep monitoring to get improvement as planned.

5.5.2 To conduct training to sales staffs to compensate for weak points of knowledge or necessary selling skill in order to provide fair and equitable products and services to the customer.

5.5.3 To evaluate the results of communication and training to ensure that sales staffs obtain knowledge and understanding about the contents and able to fulfill their duties and responsibilities properly, and to further improve the communication and training.

## 5.6 Customer Data Privacy

5.6.1 To continuously strengthen systems to ensure the appropriateness of customer information management, including risk management based on the three lines of defense model.

5.6.2 To formulate a concrete standard and process or procedure that can maintain the security in order to concisely handle customer information also collecting and using only necessary information as the objective informed to customer especially for the provision of such information to third party, and to ensure that all levels of employees, including third party, are aware of and comply with the standard through training courses and other necessary measures.

5.6.3 To carefully examine the appropriateness of customer information management on a regular basis, including thorough access management, measures to prevent the carrying-out of customer information by insiders, a robust information management system that prevents illegal access from the outside.



## 5.7 Problem and Complaint Handling

5.7.1 To provide channels and guidance for the customer to easily communicate their problems or complaints to the responsible department/office as well as government sector.

5.7.2 To ensure that the department/office and person responsible for problem and complaint handling are independent, capable of coordinating with other departments, and well trained to address the issues fairly.

5.7.3 To develop and firmly implement procedures for problems and complaints handling, especially for the issues which is sensitive or may cause significant impact on the Company, and resolve problems and complaints with clearness, quickness, independence, efficiency, fairness and equitability to the customer.

5.7.4 To determine the department/office and person responsible for analyzing the cause of problems and complaints and utilize the results for further improvement, such as inspection and evaluation of employee performance, improvement of products, services, operation and systems, and control, supervision and audit.

5.7.5 To report any significant issue to the Board of Director without delay and the overview of insignificant issues shall be reported to the Board of Director on a quarterly basis in order to assess the risks and improve the operations in the relevant area and prevent problem reoccurrence. Further, to report the issues to the Bank of Thailand in accordance with its guidelines for quality report of finance service.

## 5.8 Three Lines of Defense

5.8.1 To effectively govern and manage the company-wide approach to the fairness and equitability of customer service based on the three lines of defense model: operational management (1<sup>st</sup> line), risk management, compliance and other support function (2<sup>nd</sup> line), and internal audit (3<sup>rd</sup> line).

5.8.2 To ensure that each department/office in charge of three lines defense can independently assess any activity related to this framework in order to identify the activity that has potential risks and prevent and manage the conflict of interest.

5.8.3 To Report the assessment results to the directors and executives in time, which includes the improvement methods.

## 5.9 Operation and Business Continuity

5.9.1 To embed risk management and business continuity plan into fair and equitable customer service management throughout a normal time and emergency time to ensure that the customer's requirement such as order or request will be proceeded correctly, completely, and in time.



5.9.2 Customers are notified promptly and corrective action is taken immediately if the operating system fails or cannot use normally.

5.9.3 To prevent any mistake of operation and ensure fair and equitable customer service by continuously developing and updating procedure manuals and tools, and training program as employees can understand the importance of compliance.

5.9.4 To utilize IT system to support fair and equitable customer services, while considering system stability, information security, and program development which provide compliance support to the daily operation correctly and ready meet the need of use.

## 6. Framework for Fair Lending Management

### 6.1 Development and providing of loan products

6.1.1. Determine the rate of interest (Risk Base Pricing) and proper loan product by considering the ability to pay and residual income for living.

6.1.2 Determine steps of deduction by considering the benefit and reducing customer's principal debt as important to encourage financial discipline and make it possible for customer to be able to repay the debt resulting in no burden of non-performing debt.

6.1.3 To provide information and fully present product such as conditions, rights, duty, including clarify information of debt burden, payment schedule, early closing of the loan or default and the information must be accurate, clearly, not exaggerated, and not distorted.

### 6.2 Credit Risk management

6.2.1 Consider credit risk management without creating unreasonable burden on the debtor in case of there is a call for collateral, guarantee or insurance to prevent risks.

### 6.3 Debt collection and debt collection fee

6.3.1 Monitoring of debt collection in accordance with the relevant laws as well as supervise and be responsible for the operations of Outsource Agency.

### 6.4 Supporting measures, debt restructuring and debt mediation

6.4.1 Providing assistance measures when the debtor's ability to repay debt is reduced or facing financial problems in both normal and economic conditions as well as mediating debt problems in the period before suing



## 6.5 Litigation Process

6.5.1 Monitoring the operation and the execution of legal proceedings against the debtor in accordance with the legal litigation process and in accordance with the relevant laws including overseeing the operations Outsource Agency.

## 6.6 Sell off or transfer debt to others.

6.6.1 Provide information related to debts sold or transferred to the buyer or accepting the transfer of debt and provide a notice of transfer of creditor to the debtor for acknowledgment.

## **Supplementary**

### **Amendment and Abolishment of this policy**

Any significant amendment or abolishment of this Policy shall be proposed by Compliance Office to the Board of Directors for approval.

### **Periodic review of the Policy**

This Policy shall be subject to review annually from the date of enforcement in principle. However, such review may be conducted in any appropriate time in case there is any significant amendment or abolishment.

### **Date of Enforcement**

This Policy was considered and approved by the Board of Directors dated 24 February 2022 and This Policy shall come into force on 1 March 2022.