

## **Policy on Monitoring Action on Conflicts of Interest & Actions that appear to unfairly impact the Rights and Benefit for Unitholders**

Phillip Asset Management Company Limited (Company) has implemented a policy on monitoring actions that may cause conflicts of interest and actions that may appear unfair impact unitholders or may risk damaging the interests of the unitholders (Policy), in order to ensure that the rights and benefits of unitholders are protected. The Policy will be implemented independently from the Company and its management, with details as follows:

### **1. Implementation guidelines**

The Company will develop / review the Policy annually and propose for approval from Board of Directors or committee assigned by the Board of Directors. The Company has assigned Mr. Sanupong Suthadtumakul as the Independent Oversight Entity Officer ("IOE") to supervise as follows. The IOE has the ability and right to request data at will directly from the Company at discretion

1.1 Purchase or sale of products in capital markets and securities with related counterparties, such as, but not limited to securities brokerages, as well as the purchase or sales of products in capital markets and securities with no market price or liquidity, if applicable.

**Procedure:** IOE Officer gathers/requests transaction data under this scope and evaluates the data regarding the frequency, volume, value of transactions and other aspects that the IOE Officer deems appropriate.

**Frequency:** Biannually

1.2 Procedure of the management of mutual funds

**Procedure:** IOE Officer gathers/requests data under this scope and evaluates the management of mutual funds regarding the policies, potential unitholders, monitoring of distributors, risks, performance, complaints and other aspects that the IOE Officer deems appropriate.

**Frequency:** Biannually

1.3 Selecting and monitoring of service providers, such as securities brokerages, as well as the placement of trade orders of products and securities in all capital markets

**Procedure:** IOE Officer gathers/requests data on the selection of distributors, criteria for the selection of distributors, allocation of orders and other aspects that the IOE Officer deems appropriate.

**Frequency:** Biannually

1.4 Monitoring the management fees and all expenses collected from mutual funds or unitholders

**Procedure:** IOE Officer gathers/requests data on fees and expenses collected from mutual funds or unitholders and other aspects that the IOE Officer deems appropriate.

**Frequency:** Biannually

1.5 Exercise of voting rights at meetings of security holders

**Procedure:** IOE Officer gathers/requests data on the exercise of voting rights at the shareholders meetings on behalf of the fund unitholders, if applicable. This includes the process of requesting shareholder resolution, resolution results and other aspects that the IOE Officer deems appropriate.

**Frequency:** Biannually

## **2. Duties of IOE Officer are as follows:**

2.1 IOE must participate and provide comments when the following events occur:

2.1.1 When the Policy is developed or reviewed, the IOE must propose and advise the Board of Directors or the committee assigned by Board of Directors.

2.1.2 When prospectus, procedures or commitments which require a special resolution under the Notification of the Capital Market Supervisory Board regarding Rules, Conditions and Procedures for Requesting Resolution of Unitholders and Arranging for Unitholders' Meetings of Mutual Fund are amended.

2.2 IOE must report the result of the aforementioned implementation guidelines and propose to the Board of Directors or the committee assigned by Board of Directors and submit to the SEC annually within 2 months after the end of calendar year.

In the event that actions of the Company may cause conflicts of interest or may give rise to risks of damaging the interests of the unitholders, IOE must report to the Board of Directors or the committee assigned by the Board of Directors, together with submitting to the SEC within 7 working days from the date of acknowledgment or the date that the action should be acknowledged. The details of the report must include the following:

1. Subject of monitoring
2. Results of monitoring
3. Suggestions for improvement (if applicable)

**3. Duties of the Company are as follows:**

3.1 The Company must submit comments in relation to 2.1.2 to unitholders together with requests for resolution.

3.2 The Company must disclose information in relation to 2.2 through communication channels readily accessible to unitholders within the first quarter of every year.



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(Mr. Sanupong Suthadtumakul)

Independent Oversight Entity Officer

**This Policy was approved by the board of Directors meeting 1/2024 on 21 Feb 2024**