

**Compliance Report of Investment Governance Code Policy Year 2025**  
**StashAway Asset Management (Thailand) Co., Ltd. (StashAway Thailand)**

Investment Governance Principle	Implementation and practice	Details
1. Adopt a clear written Investment Governance Policy.	✓	StashAway Thailand has adopted the Investment Governance Code, a written Investment Governance approach. This Code is applied in line with StashAway Thailand’s structure, operations, investment styles, approaches and the scale of operations, which was endorsed by the Board of Directors on 25 August 2021.
2. Properly prevent and manage conflicts of interest and prioritise advancing the best interest of clients	✓	StashAway Thailand has developed and implemented a number of policies and procedures and controls to raise awareness and create an environment where the conflicts of interest are limited where possible, and where conflicts are appropriately disclosed and managed within the organisation.
3. Make informed investment decisions and engage in active ongoing monitoring of investee companies	✓	Algorithm-based investment framework called ERAA™ uses macroeconomic data to identify economic regimes and systematically manage, rebalance, and optimise all clients’ portfolios and actively monitors external economic forces to determine economic environments, navigating economic uncertainty, and seeking asset class valuation gaps - ensuring that asset allocations are always optimised.
4. Apply enhanced monitoring of and engagement with the investee companies if monitoring pursuant to Principle 3 is considered insufficient	✓	When a high probability of abnormal market behaviour is detected, the ERAA™ will signal a warning and re-allocate our clients’ portfolios in a protective way until the markets regain clarity. The Investment Committee, functioning as “a gate-keeper”, overseeing the integrity of input data to ensure the algorithm-based investment framework adheres to its decision logic.
5. Act collectively with other investors and stakeholders as appropriate	- <b>(No incident)</b>	StashAway Thailand is open to collaborating with other investors (both domestic and overseas) to communicate an area of concerns with investee ETFs.
6. Regularly disclose the Investment Governance Policy and compliance with the Policy	✓	StashAway Thailand maintains and ensures the information disclosed to clients and the public is accurate, consistent, updated, complete and not misleading. Our Investment Governance Policy as well as a report on compliance are disseminated on our website.