

Company Registration No: 199401018851 (304530-H)

Anti-Money Laundering (AML) Policy

1. Purpose

The purpose of this Anti-Money Laundering (AML) Policy is to establish a comprehensive framework and set of procedures for Semangat Lestari (M) Sdn Bhd ("the Company") aimed at preventing and detecting money laundering activities. This policy is designed to ensure compliance with applicable laws and regulations, thereby protecting the Company from being inadvertently used as a conduit for money laundering. Furthermore, it fosters a culture of compliance among all employees, directors, and officers, as well as third parties engaged in activities on behalf of the Company, ensuring that they are aware of their responsibilities in maintaining the integrity of the business.

2. Scope

This policy applies to all employees, directors, and officers of Semangat Lestari (M) Sdn Bhd, as well as to any third parties acting on behalf of the Company. It encompasses all aspects of the Company's operations, ensuring that all personnel are aligned with the objectives of the AML Policy. By delineating the scope of the policy, the Company aims to create a unified approach to combating money laundering and to ensure that everyone associated with the Company understands their role in this important initiative.

3. Definitions

In the context of this policy, "money laundering" refers to the process of concealing the origins of illegally obtained money, typically by executing a complex sequence of banking transfers or commercial transactions. The term "suspicious activity" denotes any transaction or behavior that raises concerns regarding potential money laundering or other illicit financial activities. By clearly defining these terms, the Company seeks to enhance understanding among its employees and stakeholders about the risks associated with money laundering and the importance of vigilance in identifying suspicious activities.

4. Legal Framework

Semangat Lestari (M) Sdn Bhd's Anti-Money Laundering Policy is grounded in a robust legal framework that adheres to relevant anti-money laundering laws and regulations, including the Anti-Money Laundering and Anti-Terrorism Financing Act 2001 (AMLATFA) and other applicable statutes in Malaysia. This legal foundation ensures that the Company operates within the confines of the law while actively working to prevent money laundering and terrorist financing activities. By aligning its policies with these

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regulations, the Company not only fulfills its legal obligations but also reinforces its commitment to ethical business practices and corporate responsibility.

5. Monitoring and Reporting

Semangat Lestari (M) Sdn Bhd is committed to implementing effective monitoring and reporting systems to detect and respond to suspicious activities that may indicate money laundering or terrorist financing. Transactions will be continuously monitored for any unusual patterns or behaviors, and employees will be trained to recognize red flags that warrant further investigation. In cases where suspicious activity is detected, the Company will promptly report these findings to the relevant authorities in accordance with regulatory requirements. This proactive approach not only helps in preventing potential financial crimes but also reinforces the Company's dedication to transparency and compliance.

6. Policy review and Updates

To ensure the continued effectiveness and relevance of its Anti-Money Laundering Policy, Semangat Lestari (M) Sdn Bhd will conduct regular reviews and updates. These assessments will take into account any changes in legislation, emerging risks, and best practices within the industry. The Company is dedicated to maintaining a dynamic approach to its anti-money laundering efforts, which will involve engaging with stakeholders and soliciting feedback to refine its policies. By staying current with evolving threats and regulatory requirements, Semangat Lestari (M) Sdn Bhd aims to enhance its defenses against money laundering and terrorist financing activities.

7. Approval

This Anti-Money Laundering Policy has been reviewed and approved by the Board of Directors of Semangat Lestari (M) Sdn Bhd. The approval signifies the Company's commitment to uphold the highest standards of integrity and compliance in all its operations. The policy will be effective immediately and will be disseminated to all employees to ensure understanding and adherence. The approval date for this policy is set for **7th October 2024**, marking a significant step in the Company's ongoing efforts to combat financial crime and promote a culture of compliance within the organization.