

# ANTI-MONEY LAUNDERING AND ANTI-TERRORISM (AML) FINANCING POLICY

## 1. INTRODUCTION

SRKK Group recognizes the objectives of the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (“AML”) and the latest Guidelines on Anti-Money Laundering, Countering Financing of Terrorism and Targeted Financial Sanctions for Designated Non-Financial Businesses and Professions (DNFBPs) & Non-Bank Financial Institutions (NBFIs) issued by the Bank Negara Malaysia on 31 December 2019 (“BNM Guidelines”). SRKK Group understands the dangers and impact of these financial crimes and deleterious socio-economic effects for the nation.

## 2. PURPOSE

This AML Policy lays out the following key principles and objectives:

- a) Obligations of SRKK Group with respect to the requirements imposed under the AML and the BNM Guidelines;
- b) Implementation of risk-based approach taken by SRKK Group, in accordance with requirements imposed by AML and BNM Guidelines.

## 3. SCOPE

This AML Policy covers the key objectives and intends to achieve full commitment and compliance to the laws of Malaysia and commit its resources in preventing any form of financial crimes.

## 4. APPLICABILITY

Although both AML and BNM Guidelines may not be exclusively applicable to SRKK Group, depending on SRKK Group’s respective nature of business and whether a transaction may or may not be its arms’ length business transaction, SRKK Group and its Members have a duty to read and understand this AML Policy as part of SRKK Group’s effort in managing these financial crimes.

## 5. SRKK GROUP’S COMMITMENT

Based on the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (AML), SRKK Group will use its best endeavors to meet the requirements imposed and all applicable laws to commensurate with the nature of SRKK Group’s businesses and activities. SRKK Group will undertake the following as part of its business operations:

- a. Risk Management Function – SRKK Group has a dedicated Company Secretary to manage the risks when dealing with local and international Business Partners or potential vendors via risk profiling.
- b. Reporting Officer – The Company Secretary shall be responsible as the Reporting Officer for AML reporting.
- c. Reporting Mechanism – The Reporting Officer shall be the focal point for all AML reports and shall be the person responsible for the submission of suspicious transaction reports to the Financial Intelligence & Enforcement Department, Bank Negara Malaysia.

## 6. REVIEW AND AMENDMENT

Upon the recommendation of Company Secretary, this AML Policy may be reviewed annually by the Management, and as and when the need arises, and the changes shall be communicated to all levels of Members.