

ANTI-MONEY LAUNDERING AND COUNTER TERRORISM FINANCING POLICY

1. POLICY STATEMENT

- 1.1 Ancom Nylex Berhad ("ANB" or "Company") and its subsidiaries ("Group") are committed to conducting business with integrity and transparency, and in compliance with all applicable laws relating to money laundering, terrorism financing and the proceeds of unlawful activity, including the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 ("AMLA") and applicable sanctions laws.
- 1.2 The Group adopts a zero-tolerance approach to money laundering, terrorism financing and any activity that facilitates, conceals or supports the proceeds of crime or terrorist activity. It does not knowingly engage in, facilitate, support or tolerate any such activity, and any suspected violation shall be treated seriously and dealt with in accordance with applicable law and the Group's internal procedures.
- 1.3 This Policy states the Group's commitment and guiding principles. It shall be read together with the Group's Anti-Money Laundering and Counter Terrorism Financing Procedures Manual and other applicable internal policies and procedures.

2. BASIS AND APPLICATION OF THIS POLICY

- 2.1 The Group is not a reporting institution listed in the First Schedule to AMLA. The Group nevertheless adopts this Policy as a matter of sound governance and because the money laundering and terrorism financing offences under AMLA apply to any person. Where any Group company is or becomes subject to obligations as a reporting institution, or to equivalent obligations in another jurisdiction, it shall comply with those obligations in full and the requirements of this Policy shall apply in addition to, and not in substitution for, them.
- 2.2 This Policy applies to all Directors, officers and employees of the Group ("Personnel"), and to all business activities, operations, transactions and relationships undertaken by or on behalf of the Group, in Malaysia and in every other jurisdiction in which the Group operates.

3. OBJECTIVES

- 3.1 The objectives of this Policy are to:
 - (a) state the Group's commitment to preventing and combating money laundering and terrorism financing;
 - (b) promote a culture of integrity, accountability and compliance throughout the Group;
 - (c) provide a framework for identifying, assessing and managing money laundering and terrorism financing risk;
 - (d) support compliance with applicable laws, regulations and sanctions measures; and
 - (e) encourage the timely reporting and escalation of suspicious transactions, activities and concerns.

4. POLICY PRINCIPLES

- 4.1 **Compliance with laws and regulations.** The Group shall conduct its business in compliance with all applicable anti-money laundering, counter terrorism financing and sanctions laws and regulatory requirements in the jurisdictions in which it operates.
- 4.2 **Risk-based approach.** The Group shall adopt a risk-based approach to identifying, assessing, managing and monitoring money laundering and terrorism financing risk arising from its operations, customers, suppliers, business partners and transactions, and shall direct its control effort to the areas of greatest exposure.
- 4.3 **Due diligence and business integrity.** The Group shall implement measures proportionate to risk to understand and assess the legitimacy and integrity of customers, suppliers,

contractors, agents, intermediaries and other counterparties, and shall decline or discontinue a relationship where that assessment cannot satisfactorily be made.

- 4.4 **Sanctions and trade restrictions.** The Group shall maintain measures to screen counterparties and transactions against applicable sanctions lists, including those issued by the United Nations Security Council and those given effect under Malaysian law, and shall not knowingly deal with a sanctioned person or in a manner that breaches applicable trade restrictions or export controls.
- 4.5 **Monitoring, record management and confidentiality.** The Group shall maintain appropriate systems, controls and records to support the identification, monitoring and reporting of suspicious transactions and activities in accordance with applicable legal and regulatory requirements. Where a report is made, Personnel shall not disclose the report, or its content, to the person who is the subject of it or to any other unauthorised person.
- 4.6 **Reporting of suspicious activity.** The Group encourages Personnel to report promptly any knowledge, suspicion or concern relating to money laundering, terrorism financing or other unlawful financial activity through the established reporting channels.
- 4.7 **Awareness and training.** The Group shall promote awareness and understanding of anti-money laundering and counter terrorism financing obligations through appropriate communication, guidance and training, targeted to roles with material exposure.

5. GOVERNANCE AND OVERSIGHT

- 5.1 The Board of Directors is responsible for overseeing the implementation of this Policy and for ensuring that appropriate governance, risk management and internal control measures are established and maintained to address money laundering and terrorism financing risk.
- 5.2 The Audit Committee shall oversee the effectiveness of the Group's anti-money laundering and counter terrorism financing framework and review significant matters reported under this Policy.
- 5.3 Management is responsible for implementing this Policy and for establishing the procedures, controls, monitoring mechanisms and reporting processes necessary to give effect to it and to comply with applicable legal and regulatory requirements.
- 5.4 Personnel are responsible for complying with this Policy and the applicable internal procedures; for remaining vigilant to indicators of money laundering and terrorism financing; for promptly reporting any suspicious transaction, activity or concern; and for cooperating fully with any review, inquiry or investigation.

6. REPORTING OF CONCERNS

- 6.1 Personnel who become aware of, or suspect, any money laundering, terrorism financing or related unlawful activity shall promptly report the matter through the Group's established reporting channels, including where appropriate the channels set out in the Whistle-Blowing Policy.
- 6.2 All reports made in good faith shall be treated confidentially to the extent permitted by law, and no person shall be subjected to retaliation, discrimination or detrimental treatment for making such a report.

7. BREACH OF POLICY

- 7.1 Any violation of this Policy may result in disciplinary action, including termination of employment or engagement, and where appropriate referral to the relevant regulatory, enforcement or other competent authority.

8. REVIEW AND PUBLICATION

- 8.1 This Policy shall be reviewed at least once every three years, and whenever there is a material change in the applicable law, regulation or sanctions regime, or in the circumstances of the Group. Any amendment is subject to the approval of the Board.
- 8.2 This Policy shall be made available on the Company's website at www.ancomnylex.com.

DOCUMENT CONTROL

Document	Anti-Money Laundering and Counter Terrorism Financing Policy
Owner	Audit Committee
Approved by	Board of Directors
Date of approval	29 September 2026
Supersedes	Not Applicable