

RELATED PARTY TRANSACTIONS POLICY

1. PURPOSE

- 1.1 Ancom Nylex Berhad ("ANB" or "Company") and its subsidiaries ("Group") are committed to conducting business with integrity, transparency and in accordance with sound corporate governance principles.
- 1.2 Transactions with related parties are a normal feature of a group of companies. The governance concern is not the existence of such transactions but the risk that the interests of the Group and of its minority shareholders are subordinated to the interests of the related party. This Policy exists to ensure that risk is identified and controlled.
- 1.3 This Policy establishes the principles and the governance framework to ensure that related party transactions ("RPTs") and recurrent related party transactions of a revenue or trading nature ("RRPTs") undertaken by the Group are:
- (a) entered into in the ordinary course of business;
 - (b) carried out on arm's length terms and on normal commercial terms;
 - (c) on terms that are fair, reasonable and not more favourable to the related party than those generally available to the public;
 - (d) not detrimental to the interests of minority shareholders; and
 - (e) undertaken in compliance with applicable laws, regulations and regulatory requirements.

2. SCOPE AND RELATED PARTIES

- 2.1 This Policy applies to the Company and to every company within the Group, and covers all RPTs and RRPTs.
- 2.2 A "related party" includes a Director, a major shareholder or the chief executive of the Company or of any of its subsidiaries or holding companies, and any person connected with such a person, in each case as defined in the Main Market Listing Requirements of Bursa Malaysia Securities Berhad ("Listing Requirements"). It includes a person who fell within any of those descriptions at any time within the preceding six months. Where a transaction is a related party transaction under applicable accounting standards but not under the Listing Requirements, or the reverse, the wider definition applies for the purposes of identification and internal review.
- 2.3 This Policy is to be read together with the Group's Conflict-of-Interest Policy. A related party transaction will frequently give rise to a conflict of interest and must then be dealt with under both policies; a conflict of interest may exist without any related party transaction, and is dealt with under the Conflict-of-Interest Policy alone.

3. POLICY PRINCIPLES

- 3.1 **Fairness and arm's length dealing.** Every RPT and RRPT shall be undertaken on commercial terms consistent with market practice and on terms no more favourable to the related party than those generally available to unrelated third parties. Where a comparable market benchmark is not readily available, the basis on which the terms were determined shall be documented.
- 3.2 **Transparency and disclosure.** The Group shall maintain appropriate identification, disclosure and reporting mechanisms to ensure transparency and compliance with its disclosure obligations.
- 3.3 **Proper governance and oversight.** The Audit Committee shall review RPTs and RRPTs and oversee the adequacy and effectiveness of the framework governing them. The Board

retains overall oversight responsibility to ensure that such transactions are managed in accordance with this Policy.

- 3.4 **Management of conflicts.** A Director, key management personnel or other person with an interest in an RPT or RRPT shall disclose that interest and shall abstain from all deliberation, review, decision-making and voting in relation to the transaction at Board and Committee level. An interested Director or major shareholder shall also abstain from voting in respect of their shareholdings on the relevant resolution at a general meeting, and shall procure that persons connected with them likewise abstain.
- 3.5 **Compliance with laws and regulatory requirements.** The Group shall comply with all applicable legal and regulatory requirements, including:
- (a) the Companies Act 2016;
 - (b) the Capital Markets and Services Act 2007;
 - (c) Chapter 10 of the Listing Requirements, governing the thresholds, announcement, circular, independent advice and shareholder approval requirements applicable to RPTs and RRPTs; and
 - (d) other applicable laws, regulations and corporate governance requirements.

4. GOVERNANCE AND RESPONSIBILITIES

- 4.1 The Board of Directors has overall responsibility for the governance and oversight of RPTs and RRPTs.
- 4.2 The Audit Committee shall assist the Board by reviewing RPTs and RRPTs entered into by the Group, reviewing the adequacy of the processes for identifying and evaluating them, monitoring compliance with this Policy, and reviewing the related disclosures to be made in the Company's annual report. Where a transaction, procedure or course of conduct raises a question of Management integrity, the Audit Committee shall report it to the Board.
- 4.3 Management shall establish and maintain the procedures, internal controls, monitoring mechanisms and records necessary to support compliance with this Policy, including the maintenance of a register of related parties and of RPTs and RRPTs.
- 4.4 Directors and key management personnel are responsible for the timely disclosure of their related party relationships and of any potential conflict of interest, and for keeping those disclosures current.

5. IMPLEMENTATION THROUGH PROCEDURES

- 5.1 The Group shall establish appropriate procedures and internal controls to identify, assess, review, approve, monitor and report RPTs and RRPTs.
- 5.2 Detailed operational procedures, thresholds, approval authorities, reporting requirements and monitoring mechanisms shall be set out separately in the Group's internal procedures and guidelines, which may be updated from time to time and which shall reflect the thresholds and requirements of Chapter 10 of the Listing Requirements.
- 5.3 Where the Listing Requirements so require, the Company shall appoint an independent adviser to advise the minority shareholders on the fairness and reasonableness of a transaction and on whether it is detrimental to their interests, and shall procure the shareholder mandate or approval required.

6. DISCLOSURE AND REPORTING

- 6.1 The Company shall make the announcements, circulars and annual report disclosures relating to RPTs and RRPTs required under the Listing Requirements and other applicable legal and regulatory requirements.

7. BREACH OF POLICY

- 7.1 A failure to identify, disclose, obtain approval for or properly manage an RPT or RRPT is a breach of this Policy, and may result in disciplinary action and in such remedial or other action as the Board considers appropriate.

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 guidance, 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	Related Party Transactions Policy
Owner	Audit Committee
Approved by	Board of Directors
Date of approval	29 September 2026
Supersedes	Not Applicable