



POLYMER LINK HOLDINGS BERHAD

Registration No. 201301011960 (1041798-A)
(Incorporated in Malaysia under the Companies Act 1965
and deemed registered under the Companies Act 2016)

ANTI-MONEY LAUNDERING POLICY

Anti-Money Laundering Policy			
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Version	Date	Summary of Changes

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1.0 INTRODUCTION

Polymer Link Holdings Berhad ("**Polymer Link**" or the "**Company**") and its subsidiaries (hereinafter referred to as the "**Group**") recognise that combating money laundering and terrorism financing is essential for maintaining the integrity of the financial system and upholding ethical business practices. This Anti-Money Laundering Policy ("**Policy**") articulates the framework, procedures, and controls put in place by the Company and its subsidiaries to prevent and detect instances of money laundering and terrorism financing in line with the Malaysian Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 ("**AMLA**"). This policy shall be followed by the employees and board members of the company and its subsidiaries when carrying out their daily responsibilities.

2.0 POLICY STATEMENT

- 2.1 Money laundering is the process of introducing money, property or other assets derived from illegal and criminal activities into the legal financial and business cycle to give it a legitimate appearance. It is a process to clean 'dirty' money in order to disguise its criminal origin.
- 2.2 The Group firmly adheres to a policy of zero tolerance towards money laundering and terrorism financing. We are committed to fully complying with the provisions of the AMLA, as well as associated regulations and guidelines set forth by the relevant regulatory authorities. Any suspected activities relating to money laundering or terrorism financing should be reported immediately to Bank Negara Malaysia and relevant authorities.
- 2.3 The Group prohibits all involvement in money laundering activities and terrorism financing either directly or indirectly, to comply with AMLA imposed by the Government of Malaysia, Bank Negara Malaysia, other agencies including related policies and legal requirements. The activities may include, but not limited to the following:
 - (a) Payments made in currencies that differ from invoices;
 - (b) Attempts to make payment in cash or cash equivalent (out of normal business practice);
 - (c) Payments made by third parties that are not parties to the contract; and
 - (d) Payments to or from accounts of third parties that are not parties to the contract.
- 2.4 This Policy applies to all business units or entities in the Group especially those which fall under the definition of "Reporting Institutions" as described in the First Schedule of the AMLA.

3.0 KEY PRINCIPLES

- 3.1 The Group is committed to complying with Part IV: Reporting Requirement of AMLA. This includes maintaining transaction records, implementing customer due diligence, reporting suspicious transactions, and safeguarding whistleblowers. The organization also enforces compliance programs to ensure adherence to regulatory standards and to mitigate financial crime risks.
- 3.2 Risk-Based Approach: The Group periodically assess the potential risk of money laundering and terrorism financing within our operations. This assessment considers factors such as customer profiles, products, services, and geographical locations to ensure our risk management strategies remain effective and responsive.
- 3.3 Customer Due Diligence (“**CDD**”): We conduct thorough customer due diligence when establishing business relationships, verifying customer identities, understanding their backgrounds, and assessing their potential risk. CDD measures are proportionate to the assessed risk level. We conduct periodic reviews of customer profiles to ensure alignment with the customer’s known financial activities and risk profile.
- 3.4 Enhanced Due Diligence (“**EDD**”): High-risk customers, transactions, or business relationships trigger enhanced due diligence measures. These may involve seeking additional information, conducting ongoing monitoring, and assessing the source of funds.
- 3.5 Suspicious Transaction Reporting: The Group maintains a system for identifying, reporting, and documenting suspicious transactions. Our employees are notified to recognise unusual patterns of activity and promptly report them to the Compliance Officer. Subject to amendments made by the Board of Directors, the Compliance Officer shall be the Vice President of Supply Chain.
- 3.6 Record Keeping: To adhere to regulatory requirements, the Group maintains accurate and up-to-date records of customer information, transactions, and due diligence procedures. These records are stored securely and retained for 7 years.
- 3.7 Internal Policies and Training: Clear internal policies and procedures are established to guide employees in complying with anti-money laundering regulations. Ongoing training programs ensure that employees understand their obligations, the risks associated with money laundering, and the importance of compliance.
- 3.8 Whistleblower Protection: We maintain a mechanism for employees, customers, and stakeholders to report suspected violations of the Policy or suspicious activities. Whistleblowers are assured of confidentiality and protection against retaliation.

4.0 IMPLEMENTATION

- 4.1 Management Oversight: Board of Directors and key senior management provide unwavering support for the implementation of this Policy, actively promoting a culture of compliance and integrity.
- 4.2 Designated Compliance Officer: The Company appoints a Compliance Officer responsible for overseeing and ensuring adherence to anti-money laundering regulations and obligations. The Compliance Officer will report to the Group Managing Director which in turns reports to the Group CEO and Board of Directors.
- 4.3 Monitoring and Reporting: Routine monitoring of transactions and compliance with the Policy is conducted to identify discrepancies and potential risks. Non-compliance or suspicious activities are promptly reported to the Compliance Officer for further investigation and action.
- 4.4 Ongoing Training: Employees in customer-facing roles and those exposed to money laundering risks receive regular training to stay abreast of evolving threats, trends, and regulations related to money laundering and terrorism financing.

5.0 REVIEW AND AMENDMENTS

The Policy has been reviewed and approved by the Board of Directors of Polymer Link (“**Board**”). It shall be periodically reviewed to ensure its continued alignment with legal requirements and industry best practices. Amendments will be made as necessary to enhance the Policy's effectiveness.

6.0 CONCLUSION

The Group remains steadfast in their commitment to maintaining financial integrity and preventing illicit financial activities. Any suspected activities relating to money laundering or terrorism financing shall be reported to Bank Negara Malaysia and the relevant authorities in accordance with the prevailing regulations. By adhering to the Policy, we contribute to safeguarding the financial system, upholding ethical standards, and fulfilling our responsibilities as responsible corporate citizens.

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