



SURE-REACH GROUP

ANTI-MONEY LAUNDERING POLICY

July 2021

1. INTRODUCTION

1.1 BACKGROUND

1.1.1 The Group is committed to institute policies to support the Group's business operations and assist its Employees to understand their obligations in upholding corporate integrity and the Group's reputation.

1.1.2 The Group does not condone any act of money laundering and financing of terrorism or unlawful activities which are criminal acts in nature as well as indictable offences.

1.2 OBJECTIVE

1.2.1 This Policy sets out the framework for the disclosure of any Money Laundering and the protection of the party making the disclosure (hereafter referred to as the Informer).

1.2.2 The purpose of this policy is to reiterate commitment to compliance by the Sure-Reach Group of companies, its officers, directors and employees to the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (AMLATFA).

1.2.3 The Policy aims to:-

- a) Promote standards of good corporate practices.
- b) Provide a safe and confidential avenue for employees of the Company and members of the public to disclose any Money Laundering.
- c) Reassure the Complainants that they will be protected from reprisals for the disclosure of any improper conduct made in good faith and with sound judgement to avoid baseless allegations.

1.3 SCOPE

1.3.1 All employees, directors and board members shall understand, adopt and adhere to the contents of the Group Anti-Money Laundering Policy.

1.4 APPLICATION

1.4.1 This policy is applicable to all entities within the Group, subsidiaries and branches.

1.5 APPROVAL

1.5.1 This policy shall be adhered to at all times by the Group's Employees. Any amendments to the Policy must be approved by EXCO.

2. POLICY STATEMENT

2.1 It is Sure-Reach's policy to commit towards ensuring the highest standards of integrity, accountability and professionalism in the conduct of its businesses. This is consistent with the Company's core values of INTEGRITY, RESPECT, RESPONSIBILITY and RELIABILITY.

2.2 Sure-Reach's Anti-Money Laundering Policy aims to facilitate prevention of money laundering and financing of terrorism or unlawful activities occurring within the Group.

3. MONEY LAUNDERING

3.1 Definition

Money Laundering is defined as the act of concealing illegally obtained money, typically by means of transfer involving foreign banks or legitimate businesses.

3.2 Examples of Money Laundering

- a) Engaging directly or indirectly in a transaction that involve proceeds to an unlawful activity.
- b) Acquires, receives, possesses, disguises, transfers, converts, exchanges, carries, disposes of or uses proceeds of an unlawful activity.
- c) Removes from or brings into Malaysia, proceeds of an unlawful activity.
- d) Conceals, disguises or impedes the establishment of the true nature of an unlawful activity.

These examples are not exhaustive and any matter raised under this Policy will be reviewed and considered appropriately in compliance to domestic and international laws.

4. CONFIDENTIALITY OF AND PROTECTION TO THE INFORMER

4.1 Confidentiality

The Informer's identity shall be kept confidential to the extent reasonably practicable, unless otherwise required by law or to facilitate investigations and/or other relevant processes.

4.2 Protection from Reprisals

The Informer will be protected from any reprisals as a direct consequence of the disclosure, e.g. victimization, disciplinary measures, termination of employment etc. provided that the Informer satisfies all the following conditions:-

- a) The disclosure is made in GOOD FAITH and with SOUND JUDGEMENT.
- b) The disclosure is not malicious, frivolous or vexatious.
- c) The disclosure is not for personal gain or interest.
- d) The disclosure is not made with the motive of avoiding disciplinary action.
- e) The Informer, to the best of his/her knowledge, is aware and believes that the information and allegations disclosed are true.

4.3 Disciplinary Action against the Informer

Any false, malicious or defamatory allegations are viewed very seriously and the appropriate disciplinary action may be taken against the Informer, including dismissal.

4.4 Immunity from Protection

The protection given to an Informer however does not include immunity from any investigations, disciplinary or other actions arising from any personal wrongdoings, acts of misconduct or nonperformance on his part.

5.0 PROCEDURES FOR MAKING A DISCLOSURE OF MONEY LAUNDERING

5.1 Channels for Making a Disclosure at the Company

a) In writing or through the completion of the prescribed Complaint Form (as per Appendix "A "), submitted through either of the following parties:-

- i. Group Managing Director
- ii. Group Executive Director

b) E-mail: exco@sure-reach.com

c) In the event that the disclosure relates to any of the parties in Item a) above, the disclosure may be made directly to the Board of Directors.

5.2 Details of Improper Conduct and Supporting Evidence

Disclosures of Money Laundering must be with sufficient details and supported with documentary evidences and/or information of parties who are able to confirm or support the disclosures, wherever practicable.

5.3 Anonymous Disclosures

Anonymous disclosures will not be entertained as they may hinder investigation and the Group's ability to ensure that the disclosure is genuine. Anonymity will also prevent the Informer from being accorded the necessary protection. Notwithstanding, the Group reserves its right to investigate an anonymous disclosure.

5.4 Action and Outcome

The Committee will review each disclosure received and will deliberate and decide on the next course of action which may include:-

- a. To proceed with the investigations into the matter.
- b. To proceed with the appropriate disciplinary action.
- c. To close the case.
- d. To refer the matter to the relevant parties e.g. in the cases where the disclosure is not considered as a Money Laundering matter.

5.5 Notification to the Informer

Upon the completion of the investigation and other related processes and procedures, the Informer will be notified of the outcome. Such notification however may be limited to the status and/or selected information only and may exclude specific details due to confidentiality.

6.0 RELATED POLICIES, PROCEDURES AND GUIDELINES

Reference is made to the following:-

- a) Whistleblowing Policy (refer to the Company Employee Handbook)
- b) Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001

**SURE-REACH GROUP
COMPLAINT FORM**

A. DETAILS OF INDIVIDUAL LODGING THE COMPLAINT

Name: _____
Designation: _____
Company: _____
Location: _____
Telephone No.: _____ E-mail address: _____

B. COMPLAINTS

1. Please describe the nature of your complaint. Include the details of the party or parties involved, date(s), time(s), location(s) and any other relevant details. Please use additional papers, if necessary.

2. Please provide details of witness(es) or individual(s) who can support your complaint eg. name, position, company, etc.

3. Please state and attach documents and other evidences to support your complaint, if any.

C. DECLARATION

I hereby declare that this complaint is made voluntarily and that to the best of my knowledge, the details and information provided are true.

Signature: _____ Date: _____

Name: _____ IC No.: _____

Witness to this declaration (if any)

Signature: _____ Date: _____

Name: _____ IC No.: _____

D. FOR OFFICIAL USE BY THE COMPANY

Date received: _____

Remarks: _____

Signature: _____ Date: _____

Name: _____ IC No.: _____