

ANTI-MONEY LAUNDERING/COUNTER FINANCING OF TERRORISM (AML/CFT) POLICY

Zerin Properties Group is at the forefront of the Bank Negara Malaysia's initiatives and efforts in the prevention of the use of the Real Estate transactions for illicit, laundering and terrorism financing activities.

The Group demonstrates its full commitment and support to high standards of compliance with the Anti-Money Laundering/Counter Financing of Terrorism (AML/CFT) requirements by establishing a comprehensive policy, procedures, processes and systems for the prevention and detection of money laundering and terrorist financing activities.

The group-wide AML/CFT programme adopting a risk-based approach is subject to periodic reviews to ensure that it remains robust and complies with the requirements of the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (AMLATFA 2001), regulatory guidelines as well as other applicable International best practices.

Key measures undertaken in Zerin Group include having in place the following:

- Policy and procedures approved by the Board of Directors which outline the roles and responsibilities as well as establish clear accountability of all employees within the Group;
- Know Your Counterparty measures which emphasize the importance of ascertaining client's identity and establishing the ultimate economic beneficiary via documentary mechanisms.
- Sophisticated filtering to scrutinize clients' transactions for reporting of suspicious activities to the Financial Intelligence and Enforcement Department (FIED), Bank Negara Malaysia on timely basis.
- Screening of individuals and entities against sanction programs such as UNSC and OFAC to ensure that Zerin Group does not deal with any sanctioned individuals/entities.
- Provision of full and timely disclosure of suspicious transactions/circumstances to the relevant authorities as provided under all applicable laws/respective jurisdictions.
- Record keeping of all identification/transaction details obtained for the purpose of customer identification (KYC) as well as of all documents in accordance with statutory requirements; and
- Regular communication, supplemented with latest updates on AML/CFT and training programs through various channels were undertaken to raise staff awareness at all levels within the Group.
- The extensive infrastructure and resources invested reaffirms the Group's full commitment and strong support to international efforts in combating money laundering, the financing of terrorism and other criminal activities.

Entities within the Zerin Group, regardless of geographic locations, are strongly committed in ensuring compliance with the Group-wide AML/CFT Policy as well as applicable AML/CFT legislations within the jurisdiction they operate in adopting the most rigorous standards.

The Group fully co-operates with the enforcement agencies and authorities in the investigation of money laundering and/or financial crime.