

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

Pos Malaysia is required to comply with the requirement under Anti-Money Laundering , Anti- Terrorism Financing Proceeds of Unlawful Activities Act 2001 (AMLATFPUAA 2001) which is governed by Bank Negara Malaysia (BNM) for Money Services Business Activity.

Board of Directors, Senior Management and all employees of Pos Malaysia are fully committed in preventing and combating from any possible use of Pos Malaysia as a medium to cater for any money laundering, terrorism financing activities and proceed of any unlawful activities via transactions performed under the Pos Malaysia services either as agent or principal to the services provided.

The purpose of this policy is to ensure that Pos Malaysia is in compliant with the BNM requirement especially on Anti-Money Laundering and Counter Financing Terrorism (AML/CFT) pursuant to:

- Anti-Money Laundering , Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001;
- Anti-Money Laundering and Counter Financing Terrorism (AML/CFT) – Money Service Business (Sector 3); and
- Financial Action Task Force (FATF) Recommendations.

The scope of this policy covers among others Pos Malaysia’s policy statement, roles & responsibilities of the Board, Senior Management and all employees in relations to AML/CFT countermeasures such as follows:

- **Risk-Based Assessment**

- The enterprise-wide AML/CFT programme adopting a risk-based approach that proper controls and allocate resources in managing and mitigating the identified risks proportionate to the nature, scale and complexity of the business activities.
- Among the activities included assessment on customer and company. The result of assessment including new red flags and control measures then been communicated to the Board and the management for further action.

- **Employee Training And Awareness Programmes**

- To conduct regular awareness and training programmes on AML/CFT practices; and
- Regular communication supplemented with the latest updates on AML/CFT through various channels undertaken to raise staff awareness at all levels within the Group.

- **Suspicious Transactions Report (STR)**

- Pos Malaysia will submit a STR to Financial Intelligence and Enforcement Department (FIED) of BNM whenever the transaction has triggered the suspicion criteria.

- **Independent Audit Functions**

- Independent audit to be conducted to ensure Pos Malaysia is in compliant with the AML/CFT requirements.
- Audit findings shall be reported to the Board to highlight the assessment on the effectiveness of AML/CFT measures and any inadequacy in internal controls and procedures.