



KEB BERHAD

(Formerly known as KEB Development Sdn. Bhd.)
Registration No. 202301039301 (1533221-H)

ANTI-MONEY LAUNDERING POLICY

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1.0 POLICY STATEMENT

KEB Berhad ("**Company**") and its subsidiaries (collectively referred to as the "**Group**") are committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. This Anti-Money Laundering Policy ("**Policy**") sets out the framework by which the Group complies with the Anti-Money Laundering, Anti-Terrorism Financing, Anti-Restricted Activity Financing and Proceeds of Unlawful Activities Act 2001 ("**AMLA**") and Bank Negara Malaysia's guidelines to prevent property transactions from being exploited for money laundering or terrorism financing.

2.0 OBJECTIVE OF THE POLICY

The intended objective of this Policy is to:

- (a) ensure compliance with AMLA and related regulations;
- (b) safeguard the Group from financial crime risks linked to property sales, purchases, rentals and financing arrangements; and
- (c) promote a risk-based approach to customers and transaction due diligence.

3.0 SCOPE OF THE POLICY

This Policy applies to:

- (a) Directors, Management and employees of the Group;
- (b) Agents, brokers and third-party intermediaries engaged in property sales; and
- (c) Joint-venture partners in property projects.

4.0 GOVERNANCE AND RESPONSIBILITY

The Company expects all stakeholders, including the Board of Directors ("**Board**"), Senior Management, the compliance team and employees, to discharge their responsibilities as set out below:

- (a) Board – ultimate accountability for AMLA compliance.
- (b) Senior Management – implement AMLA framework and allocate resources.
- (c) Compliance Officer (AMLA Reporting Officer) – monitor compliance, file Suspicious Transaction Reporting ("**STRs**") and liaise with Bank Negara Malaysia.
- (d) Employees – perform Know Your Customer procedures and escalate red flags.

5.0 CUSTOMER DUE DILIGENCE ("CDD") / KNOW YOUR CUSTOMER ("KYC")

The Group requires its employees and other relevant stakeholders to conduct the following CDD/KYC measures:

Before any property transaction:

- (a) Obtain and verify NRIC and/or passport (individuals).
- (b) Obtain company registration, beneficial ownership info (corporates).
- (c) Identify politically exposed persons (PEPs) and high-risk customers.

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(Anti-Money Laundering Policy – Cont'd)

5.0 CUSTOMER DUE DILIGENCE (“CDD”) / KNOW YOUR CUSTOMER (“KYC”) (Cont'd)

Enhanced Due Diligence (EDD):

- (a) For cash transactions > RM50,000.
- (b) Foreign buyers from high-risk jurisdictions.
- (c) Complex ownership structures.

Ongoing Monitoring:

- (a) Regular checks on payment sources (bank-in, remittance, financing and etc).
- (b) Ensure payments match buyer profile.

6.0 SUSPICIOUS TRANSACTION REPORTING

The Company requires employees to promptly report any suspicious transaction or activity to the Compliance Officer. Examples of suspicious transactions or activities include:

- (a) Cash purchase of high-value properties.
- (b) A buyer who is unwilling to provide identification or the required supporting documents.
- (c) Payments made by an unrelated third party without a reasonable explanation.
- (d) Frequent purchases or sales involving unexplained sources of funds or unusual transaction patterns.

Upon receiving a report, the Compliance Officer shall assess the matter and, where appropriate, file a Suspicious Transaction Report (“STR”) with Bank Negara Malaysia in accordance with the applicable laws and regulatory requirements.

7.0 RECORD KEEPING

The Company shall maintain all CDD records, transaction records and other relevant documents for at least seven (7) years. Records, including buyer and seller information, payment records, agreements and STRs (if any), shall be securely stored and maintained in accordance with applicable laws and regulatory requirements.

8.0 REVIEW OF THE POLICY

The Board will periodically review and update this Policy to ensure its relevance, effectiveness and alignment with the Group’s objectives, practices and current laws and regulations. Any amendments to this Policy shall be approved by the Board.

This Policy is made available on the Company’s website.

9.0 APPROVAL

This Policy was reviewed and approved by the Board of the Company on 26 December 2025.