T | +60 17 – 958 5933
E | info@alamcon.com.my
W | www.alamcon.com.my

PT9125, Taman Perindustrian
Tungzen, Kampung Kepayang,
31300 Ipoh, Perak

Anti-Bribery Policy (ABC)
Anti Money Laundering Policy (AML)
Counter Financing Terrorism Policy (CFT)

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31300 Ipoh, Perak

1. Purpose

Alam-Con Sdn Bhd ("the Company") is committed to conducting all business dealings with **integrity, transparency, and accountability**.

This policy sets out the Company's zero-tolerance approach toward **bribery, corruption, money laundering, and terrorism financing**. It provides guidance to ensure that all employees, management, and business partners comply with applicable laws, including the:

- **Malaysian Anti-Corruption Commission Act 2009 (MACC Act)**
- **Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (AMLA 2001)**

This policy forms part of our broader commitment to **good governance** under the **Code of Conduct** and **Sustainability Policy**.

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2. Scope

This policy applies to all employees, management, directors, agents, consultants, suppliers, contractors, and any third parties acting for or on behalf of Alam-Con Sdn Bhd.

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3. Policy Statement

- The Company **adopts a zero-tolerance approach** to all forms of bribery, corruption, money laundering, and terrorism financing.
- No employee or representative shall, directly or indirectly, offer, give, solicit, or receive any **bribe, facilitation payment, or improper advantage**.
- All business decisions must be made **fairly, objectively, and in the Company's best interest**, without influence from personal benefit or relationships.
- The Company is committed to **complying fully with all applicable anti-corruption and AML/CFT laws** and expects the same from all its business partners.

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4. Gifts, Hospitality, and Donations

- Employees must not give or accept gifts, entertainment, or hospitality that may appear to improperly influence a business decision.
- Modest and infrequent gestures of goodwill are allowed only if:
    - They are reasonable in value,
    - They are given in good faith, and
    - They are properly declared and recorded.
- **Cash or cash equivalents** (such as vouchers or gift cards) are strictly prohibited.
- Charitable donations and sponsorships must be legitimate, transparent, and not used as a means to secure improper advantage.

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5. Conflict of Interest

- Employees must avoid situations where personal interests conflict, or appear to conflict, with the interests of the Company.
- Any potential or actual conflict must be **declared immediately** to management.

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6. Anti-Money Laundering and Counter Financing of Terrorism (AML/CFT)

Alam-Con Sdn Bhd is committed to ensuring that its operations are not used to facilitate money laundering or terrorism financing.

To support this commitment, the Company shall:

- **Comply with the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (AMLA 2001)** and all relevant regulations.
- **Prohibit** any transaction or activity that conceals the source of illegal funds or supports terrorism.
- **Monitor financial transactions** and maintain transparent, accurate records.

- **Report any suspicious activity** to management or relevant authorities, in accordance with legal obligations.
- **Train employees** to recognize potential red flags related to money laundering and terrorism financing.

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7. Responsibilities

- **Management** is responsible for implementing, communicating, and enforcing this policy.
- **Employees** must understand and comply with this policy as a condition of employment.
- **Business partners** and third parties are expected to maintain the same ethical standards.
- Non-compliance with this policy may result in disciplinary action, including termination of employment or contract, and potential legal prosecution.

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8. Reporting and Whistleblowing

- Employees or stakeholders who suspect any form of bribery, corruption, money laundering, or unethical conduct are encouraged to **report their concerns** immediately.
- Reports can be made confidentially to management or a designated officer.
- The Company strictly prohibits retaliation against anyone who reports misconduct in good faith.

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9. Review and Continuous Improvement

- This policy will be **reviewed periodically** to ensure it remains relevant and effective in addressing evolving risks and regulatory requirements.
- The Company is committed to **continuous improvement** of its integrity and compliance programs.

Seow Han Leong | Managing Director
31st Oct 2025