

## **ANTI-MONEY LAUNDERING POLICY**

### **1. INTRODUCTION**

Life Water Berhad (“Life Water” or the “Company”) is committed to high standards of ethical behaviour, and the prevention and detection of all criminal activities, including money laundering. Money laundering is an offence under the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities (“AMLATFA”) Act 2001.

The Company is committed to mitigate the risk of money laundering and terrorism financing in our business operations and that all employees are aware of their obligations and the need to adhere to the requirements in the prevention against money laundering and terrorist activities.

### **2. OBJECTIVE**

This Anti-Money Laundering (“AML”) Policy (“Policy”) provides a framework to comply with the applicable laws and regulatory guidelines in reporting of suspicious transactions or activities within the Company.

### **3. DEFINITIONS**

AML	Anti-Money Laundering
AMLA	Anti-Money Laundering Act
CFT	Counter Financing of Terrorism
Employees	All employees including directors, senior management and employees

### **4. GENERAL DESCRIPTION OF MONEY LAUNDERING AND TERRORISM FINANCING**

**4.1** Money laundering is a process of converting cash or property derived from criminal activities to give it a legitimate appearance. It is a process to clean “dirty” money in order to disguise its criminal origin.

**4.2** Terrorism financing is the act of providing financial assistance, funded from either legitimate or illegitimate sources, to terrorists or terrorist organisations to enable them to carry out terrorist acts or to benefit any terrorist or terrorist organisation.

## **5. PROCEDURES**

Life Water will conduct reasonable degree of due diligence in order to understand the business and background of customer, vendor, third party or business partner that intends to do business with the Company to determine the origin and destination of money or property involved. Any suspected activities relating to money laundering or terrorism financing should be reported immediately to Bank Negara Malaysia and relevant authorities.

Life Water prohibits all involvement in money laundering activities and terrorism financing either directly or indirectly. The activities may include, but not limited to the following:

- payments made in currencies that differ from invoices;
- attempts to make payment in cash or cash equivalent (out of normal business practice)
- payments made by third parties that are not parties to the transactions;
- payments to or from accounts of third parties that are not parties to the transactions.

## **6. CUSTOMER DUE DILIGENCE**

All departments of Life Water are required to perform customer due diligence (“CDD”) procedures when:

- at the start of a new business relationship;
- it has any suspicion of money laundering or terrorism financing activities regardless of the transaction;
- it has any doubt about the adequacy of authenticity of previously obtained information.

This process identifies business relationships and customers and, hence, ascertains relevant information whereby the identity of a new customer must be established before a financial relationship can be established.

The CDD procedures should include:

- identification and verification of customer identity using reliable, independent source of documents, data or information;
- verifying that any person purporting to act on behalf of the customer is authorised, and identifying and verifying the identity of that person;
- identifying and take reasonable measures to verify the identity of the beneficiary, using reliable, independent source of documents, data or information;
- understand and, where relevant, obtain information on the purpose of opening an account and the intended nature of the business relationship; and
- where necessary, performing appropriate background checks, where practical and relevant, on the names of the individuals or entities of customers

## **7. SUSPICIOUS TRANSACTION REPORTING**

If any suspicious money laundering or financing of terrorism activities are detected or any attempted transaction fits the list of “Red Flags” as in below, these transactions must be reported to the [Compliance Officer] via an Internal Suspicion Report.

The examples below are not intended to be exhaustive but provide a general indication of the range of matters covered by this Policy.

- Payment by a person or company of any substantial sum in cash, particularly if they fail to provide proper evidence to confirm their identity and address;
- A person or company doing business with Life Water with incomplete documentation, i.e. invoices issued without company's registered office/address and number;
- Unusual or unexpected large payments are made into the Company's bank accounts;
- Absence of any legitimate source for funds received;
- Overpayments for no legitimate reason;
- Cancellation, reversal or requests for refunds of earlier transactions; and
- Multiple cash repayments that were structured below the reporting requirements to avoid detection.

Upon receiving the Internal Suspicion Report, the Compliance Officer shall evaluate the grounds for suspicion and if suspicion is confirmed, the officer shall submit a suspicious transaction report to Bank Negara Malaysia on the next working day.

## **8. ENFORCEMENT**

Any employees who violate this Policy may be cautioned or face disciplinary action which includes termination of employment.

## **9. RECORDS KEEPING AND RETENTION OF RECORDS**

Life Water must keep record of all transactions and ensure they are up to date and relevant. The records must at least include the information for each transaction including:

- Documentation relating to the identification of the customer in whose name the account is opened or transaction is executed;
- The identification of the beneficial owner or the person on whose behalf the account is opened or transaction is executed;
- Records of the relevant account pertaining to the transaction executed;
- Types and details of transaction involved;
- The origin and the destination of the transaction, where applicable; and
- Any other information as required by the authorities.

Life Water are required to retain, for at least seven (7) years, the records of transactions, relevant customer due diligence information and other relevant information including agreements, financial accounts, business correspondences and documents relating to the transactions in a form that is admissible as evidence in court and make such documents available to the authorities.

## **10. REVIEW OF POLICY**

This Policy is reviewed and approved by the Board and its Audit and Risk Management Committee, which monitors the effectiveness of and compliance with this Policy.

*This Anti-Money Laundering Policy was approved and adopted by the Board on 22/12/2023.*