

# Anti - Money Laundering and Counter Financing Terrorism (AML/CFT) Policy

Pos Malaysia is required to comply with the requirements 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 and all employees of Pos Malaysia are fully committed in preventing and combating 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 compliance with the BNM requirements on Anti-Money Laundering and Counter Financing Terrorism (AML/CFT).

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

### **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 risk proportionate to the nature, scale and complexity of the business activities.
- Among the activities include assessment on customer and company. The result of assessment including new red flags and control measures will be 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 transactions has triggered the suspicion criteria.

# **Independent Audit Functions**

- Independent audit exercise will be conducted to ensure Pos Malaysia is 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 of internal controls and procedures.