

# Niche Capital Emas

## **NICHE CAPITAL EMAS HOLDINGS BERHAD GROUP ANTI-MONEY LAUNDERING AND COUNTER-FINANCING OF TERRORISM POLICY**

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### **1. POLICY STATEMENT**

Niche Capital Emas Holdings Berhad (“**NICE**”) and its subsidiaries (collectively, the “NICE Group”) are committed to promoting and maintaining the highest standards of integrity, accountability and transparency in the conduct of their business activities, dealings, relationships and operations, and to fostering an ethical corporate culture.

Money laundering (“**ML**”) refers to the process of introducing money, property and/or other assets derived from illegal or criminal activities into the legitimate financial and business system so as to disguise their illicit origin. ML and terrorism financing (“**TF**”) are offences under the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (“**AMLA 2001**”).

It is our policy that we shall avoid and to ensure adequate system to mitigate the risk of money laundering and terrorism financing (“**ML/TF**”) activities as stipulated AMLA 2001.

It is the policy of the NICE Group to establish and maintain adequate systems, internal controls and procedures to prevent, detect and mitigate the risks of ML/TF in compliance with AMLA 2001 and all applicable regulatory requirements.

All employees and Associated Persons of the NICE Group are required to act with honesty, fairness and integrity in all business dealings and to remain vigilant against potential ML/TF activities.

### **2. SCOPE AND APPLICATION**

This Anti-Money Laundering and Counter-Financing of Terrorism Policy (“**Policy**”) establishes the framework for managing and preventing the risk of the NICE Group being used as a conduit for ML/TF activities.

This Policy applies to all directors, officers, employees and Associated Persons of the NICE Group, whether permanent, temporary, contract or part-time, and across all jurisdictions in which the NICE Group operates, subject to applicable local laws and regulations.

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In this Policy, “**Associated Persons**” include any individual or organisation with whom the NICE Group has business dealings, including but not limited to suppliers, contractors, subcontractors, agents, consultants, advisers, distributors, joint-venture partners and government or public bodies and their respective representatives.

### 3. WHAT IS MONEY LAUNDERING

ML generally involves proceeds of unlawful activities, whether directly or indirectly related to a serious offence, that are processed through transactions or other means to conceal their true origin so that they appear to be derived from legitimate sources.

The money laundering process typically involves three (3) stages:

- **Placement** – the physical disposal of proceeds of unlawful activities by introducing illegal funds into the financial system;
- **Layering** – the separation of illicit proceeds from their source through multiple transactions designed to obscure the audit trail; and
- **Integration** – the re-introduction of laundered funds into the economy so that they appear legitimate.

Pursuant to Section 4 of AMLA 2001, a ML offence is committed when a person engages in transactions involving proceeds of unlawful activities or instrumentalities of an offence, including acquiring, receiving, possessing, disguising, transferring, converting, exchanging, disposing of or using such proceeds.

### 4. WHAT IS TERRORISM FINANCING

Financing of terrorism (“**TF**”) refers to any transaction involving funds or property, whether from legitimate or illegitimate sources, that are intended to be used to support terrorist acts, terrorists or terrorist organisations.

Section 3(1) of AMLA 2001 defines terrorism financing offences by reference to Sections 130N, 130O, 130P and 130Q of the Penal Code.

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### 5. PROHIBITION AND GENERAL OBLIGATIONS

The NICE Group strictly prohibits any direct or indirect involvement in money laundering or terrorism financing activities.

Any suspected activities relating to money laundering or terrorism financing should be reported immediately to Bank Negara Malaysia and relevant authorities.

All suspected or attempted ML/TF activities must be reported internally and without delay to the designated Compliance Officer or, where applicable, the relevant subsidiary Director, in accordance with the procedures set out in this Policy.

The NICE Group shall not engage in transactions including, but not limited to: -

- Payments made in currencies that differ from contractual or invoiced terms without reasonable justification;
- Unusual attempts to make payments in cash or cash equivalents;
- Payments made by third parties not party to the relevant contract; or
- Payments to or from accounts not held in the name of the contractual counterparty.

### 6. CUSTOMER DUE DILIGENCE (“CDD”)

The NICE Group shall conduct CDD measures:

- at the commencement of a new business relationship;
- when there is any suspicion of ML/TF, regardless of the amount involved;
- when there is doubt as to the adequacy or veracity of previously obtained information.

CDD measures shall include:

- identification and verification of customers using reliable, independent sources;
- verification of authority and identity of persons acting on behalf of customers;
- identification and reasonable verification of beneficial owners;
- understanding the purpose and intended nature of the business relationship; and

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- screening against applicable sanctions lists.

Enhanced Due Diligence (“**EDD**”) shall be applied to higher-risk customers, transactions or jurisdictions, including Politically Exposed Persons (“**PEPs**”), in accordance with a risk-based approach.

Business relationships shall be subject to ongoing monitoring to ensure transactions are consistent with the NICE Group’s knowledge of the customer and risk profile.

### 7. SUSPICIOUS TRANSACTION REPORTING

Any employee or Associated Person who detects or suspects ML/TF activities shall promptly submit an Internal Suspicion Report to the Compliance Officer.

Upon evaluation, the Compliance Officer shall, where suspicion is confirmed, submit a Suspicious Transaction Report (“**STR**”) to the Financial Intelligence Unit of Bank Negara Malaysia promptly and without delay, in accordance with AMLA 2001.

Employees and Associated Persons are strictly prohibited from tipping-off any person that an STR has been or may be lodged.

### 8. RECORD KEEPING AND RETENTION

NICE Group is required to maintain records of transactions and CDD documentation for a minimum period of seven (7) years and ensure such records are readily retrievable and admissible as evidence.

### 9. GOVERNANCE, TRAINING AND ENFORCEMENT

The Board shall appoint a Compliance Officer with sufficient authority and independence to implement this Policy and report regularly to the Board or its designated committee.

NICE Group shall provide periodic Anti-money laundering and counter-financing of terrorism training to directors, management and employees to ensure awareness of obligations and red flags.

Any breach of this Policy may result in disciplinary action, up to and including termination of employment or contractual engagement.

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### 10. REVIEW AND PUBLICATION

This Policy shall be reviewed by the Board at least once every three (3) years, or earlier if required due to regulatory or business changes.

This Policy shall be made available on NICE's website at [www.nichecapital.com.my](http://www.nichecapital.com.my).

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**Adopted by the Board of Directors on 24 February 2026**

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