

ANTI-MONEY LAUNDERING AND COUNTER FINANCING TERRORISM POLICY

1. INTRODUCTION

CRESCENDO CORPORATION BERHAD (“Crescendo” or the “Company”) is committed to achieving the highest standards of ethical conduct and complying with all applicable laws in relation to Anti-Money Laundering provisions.

Anti-money laundering provisions are designed to help prevent legitimate businesses from being used by criminals for this purpose, and to assist law enforcement agencies to trace and recover criminal assets and terrorist funding.

This Policy applies to all Directors, Officers and Employees (permanent and temporary) of Crescendo, subsidiaries and affiliated companies, regardless of the location of employment.

2. DEFINITION

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. (source: amlctf.bnm.gov.my)

Terrorism financing is the act of providing financial support, funded from either legitimate or illegitimate source, to terrorist or terrorist organisations to enable them to carry out terrorists acts or will benefit any terrorist organisation. Whilst most of the funds originate from criminal activities, they may also be derived from legitimate sources, for example, through salaries, revenues generated from legitimate business or the use of non-profit organisations to raise funds through donation. (source: amlctf.bnm.gov.my)

3. GUIDELINES

Crescendo shall comply with the requirements under Anti-Money Laundering, Anti-Terrorism Financing Proceeds of Unlawful Activities Act 2001 (AMLATFPUAA 2001) that is governed by Bank Negara Malaysia. Crescendo recognizes the importance of preventing money laundering, and therefore will comply with international and domestic laws and establish appropriate procedures.

3.1 Customer Due Diligence

Crescendo will implement and maintain appropriate measures to conduct customer due diligence.

3.2 Risk Assessment

Crescendo's Directors, Officers and Employees are expected to be mindful of the risk of the Company's business being used for money laundering activities and to raise any suspicious transactions to their immediate superior and the Board to undertake further investigation.

A risk-based assessment should be carried out to profile the risk related with the respective customers and that proper controls are in place in managing the identified risks proportionate to the nature, scale and complexity of the business activities. Among the activities includes assessment of the customers and the company, the product and/or services offered and the geographical location of the customer.

New red flags and control measures should be communicated to the Legal Manager and/or the Senior Management for further action.

3.3 Reporting of Suspicious Transactions

Crescendo will implement and maintain measures for handling suspicious transactions and will submit a Suspicious Transaction Report (STR) to Financial Intelligence and Enforcement Department (FIED) of Bank Negara Malaysia whenever the transaction has triggered the suspicion criteria.

4. REVIEW AND AMENDMENT

The Board shall review the policies as and when the need arises and make changes to the Policies, if necessary. It shall be communicated to all levels of members of the Company.

Approved by the Board of Directors at a meeting dated 16 April 2021