




Hektar Real Estate Investment Trust

Anti-Money Laundering Policy (AML)

Version: 1.0

Anti-Money Laundering Policy (AMLA)

	Sustainability
	ANTI-MONEY LAUNDERING POLICY

This **Anti-Money Laundering (AMLA) Policy** reaffirms our commitment to full compliance with **Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (AMLATFA)** and aligns with our Anti-Money Laundering Policy and Code of Conduct and Ethics (CoCE). This policy underscores Hektar REIT's dedication to conducting business with integrity and upholding the highest standards of AML/ ATF compliance.

Scope

This Policy applies to all employees of the asset manager and Property Manager of Hektar REIT, particularly those defined as "Reporting Institutions" under AMLATFA. It established the minimum standards for detecting and preventing money laundering and terrorism financing risks across our operations, safeguarding Hektar REIT from being misused for criminal activities.

Policy Statement

We strictly prohibit any practices related to money laundering and terrorism financing, including dealing with criminal proceeds. Appropriate due diligence must be performed to understand the background and business of any customer, vendor, or third-party working with Hektar REIT.

All suspicious activities are to be reported to Bank Negara Malaysia (BNM) immediately. Prohibited activities include:

- Payments in currencies different from invoiced amounts.
- Third-party payments unrelated to contractual obligations.
- Cash payments inconsistent with standard business practices.

Customer Due Diligence

We will conduct Customers Due Diligence (CDD) at the outset of any new business relationship or upon detecting suspicious activity. CDD procedures include:

- Verifying customers' and beneficial owners' identities.
- Understanding the nature and purpose of the business relationship.
- Screening against sanctions lists from the Ministry of Home Affairs (MOHA) and the United Nations Security Council.

Suspicious Transaction Reporting

Transactions flagged as suspicious must be reported to the Compliance Officer immediately. Indicators of suspicious activity include:

- Reluctance to disclose income sources.
- Transactions inconsistent with the customer's typical business.
- Unjustified payments from third parties or foreign accounts.

The Compliance Officer will assess each case and, if warranted, file a Suspicious Transaction Report (STR) with Bank Negara Malaysia.

The Manager
Hektar Asset Management Sdn Bhd

26 November 2024

Records Keeping & Retention

We will retain transactions and due diligence record for at least seven (7) years, including:

- Identification documents.
- Beneficial ownership records.
- Transaction details (origin and destination of funds).

Training & Communication

We are committed to ensuring that all employees understand their responsibilities under the AMLATFA. Relevant training will be provided to equip employees with the knowledge needed for AML/CFT compliance.