GDB HOLDINGS BERHAD
201301006623 (1036466-U)
(Incorporated in Malaysia)

ANTI-MONEY LAUNDERING POLICY

1. INTRODUCTION

GDB Holdings Berhad ("GDB" or "the Company"), and its subsidiaries ("the Group"), are committed to conducting its business with integrity, ethically, transparently and in accordance with all applicable laws and regulations relating to Anti-Money Laundering ("AML"). This Anti-Money Laundering Policy ("Policy") sets out the framework and principles adopted by the Group to prevent the Group's business and operations from being misused for money laundering or other illicit activities, and to ensure compliance with applicable national and international legal and regulatory requirements.

2. OBJECTIVE

The objectives of this Policy are to:

i. Prevent the misuse of the Group's business and operations for money laundering, fraud or other illicit activities;

ii. Set out appropriate procedures and controls that meet the minimum AML standards and requirements to identify, assess and mitigate money laundering and related financial crime risks arising from the Group's business activities and relationships with its stakeholders;

iii. Promote awareness and understanding of AML requirements among the Directors, Management and employees through appropriate communication and training;

iv. Identify and monitor unusual or suspicious transactions and activities and establish appropriate procedures for investigation and reporting in accordance with applicable laws and regulatory requirements;

v. Maintain appropriate records and documentation to demonstrate the Group's compliance with this Policy and applicable AML requirements; and

vi. Periodically review and enhance the Policy and related controls to ensure that they remain appropriate and effective in addressing changes in the Group's business activities, risk profile and applicable legal and regulatory requirements.

3. SCOPE

This Policy applies to all directors, management, employees and business associates of the Group.

4. DEFINITIONS

“Money Laundering” means the process by which proceeds of crime are disguised to appear legitimate, including placement, layering and integration of illicit funds.

“Suspicious Transaction” means any transaction or attempted transaction which gives rise to reasonable grounds to suspect money laundering, terrorist financing or other illegal activity.

“Customer Due Diligence (CDD)” means measures to identify and verify the identity of customers and beneficial owners, understand the nature of customer relationships, and assess AML risks.

“Business Associates” includes clients, vendors, contractors, consultants, agents, joint-venture partners, representatives and other third parties with whom the Group deals.

“Business Associates” means an external party with who the Group has, or plans to establish some form of business relationship. This may include clients, vendors, contractors, sub-contractors, consultants, agents, joint-venture partners, representatives, investors and business partners.

“Directors” includes all independent and non-independent directors, executive and non-executive directors of the Group and shall also include alternate or substitute directors.

“Employees” includes all individuals directly contracted to the Group on an employment basis, including permanent and fixed-term contract employees.

5. ANTI-MONEY LAUNDERING PRINCIPLES

i. The Group adopts a zero-tolerance approach to money laundering and will not knowingly be used to facilitate illegal activity.

ii. All business must be conducted in accordance with applicable AML laws and regulations in the jurisdictions where the Group operates.

iii. No employee will be penalised for refusing to carry out a transaction that may involve money laundering or terrorist financing when done in good faith.

iv. The Group will conduct appropriate assessment of declarations provided by new Business Associates and will refuse to engage or terminate, the business relationships where an unacceptable AML risk is identified.

6. RESPONSIBILITIES OF DIRECTORS & EMPLOYEES

Directors, Management and employees of the Group are responsible for understanding and complying with this Policy. In particular, the roles of Directors, Management and employees include the followings:

i. Familiarise with applicable requirements and directives of the Policy and communicate them to subordinates;

ii. Promptly record all transactions and payments accurately and in reasonable detail;

iii. Promptly escalate any suspicious transactions, as well as any actual or suspected indicators of a money laundering or violations of this Policy, to the relevant immediate superior for assessment, guidance and determination of the appropriate course of action; and

iv. Attend required anti-money laundering trainings as required according to position.

7. REPORTING POLICY VIOLATIONS

i. Employees who encounter actual or suspected violations of this Policy, and other matters of integrity, is responsible to report their concerns promptly. Whistle blowing channels are established and maintained for receiving information regarding these issues.

Personnel who encounter actual or suspected violations of this Policy are to report their concerns using the channels stated in the Whistle Blowing Policy available in the Group's website: https://www.gdbhb.com.my/wp-content/uploads/2026/06/Whistle-Blowing-Policy-21.5.26.pdf

ii. The Group assures the whistle blower who raises issues of concern that he/she will be protected from any adverse impact on their employment or relationship with the Group as a result of his/her reporting, provided the report is made in good faith and without malice. Any party that retaliates against whistle blower who has reported allegations in good faith may be subjected to appropriate action, up to and including legal action, where applicable.

8. DECLARATION

Directors, Management and all employees shall certify in writing that they have read, understood and will abide by this Policy. Copy of the declarations shall be documented and retained by the Human Resource Department.

9. AUDIT AND COMPLIANCE

Regular internal audits shall be conducted to assess and ensure compliance to this Policy. Such audits may be conducted by an independent internal auditor, as determined by the Company.

10. SANCTIONS FOR NON-COMPLIANCE

i. The Group regards money laundering as a serious matter. Non-compliance to this Policy and the Code of Ethics and Conduct of the Group would be subject to disciplinary actions and/or legal action.

ii. The Group shall also notify the relevant regulatory authorities if there are any identified money laundering or illegal activities which have been proven beyond reasonable doubt.

iii. Where notification to the relevant regulatory authorities have been done, the Group shall provide full co-operation to the said regulatory authorities, including further action which the regulatory authorities may decide to take against the implicated employee/employees.

11. REVIEW OF THE POLICY

This Policy will be reviewed at least once every three (3) years to ensure its effectiveness and consistency with the governing legislation and regulatory requirements, or more frequently should there be material changes to the said legislation and regulations or circumstance of the business, if any.

12. BOARD APPROVAL

This Policy (Version No. 1) was reviewed and approved by the Board of Directors of GDB on 20 August 2026.

Annexure

CODE OF ETHICS AND CONDUCT

All Directors, Management and employees of the Group in exercising and/or discharging their powers or duties shall comply with all applicable laws, rules and regulations including the constitutions of the Group. The core areas of conduct include the following: -

i. Compliance by the Board at all times with the Code of Ethics and Conduct and the Board Charter.

ii. Observe high standards of corporate governance at all times.

iii. Observe high standards of business, professional and ethical conduct, and to refrain themselves from offering, giving or receiving any gifts and any other form of benefits (in kind, cash, advantages and/or favour and etc) from persons or entities who deal with the Company where the gift would reasonably be expected to influence the performance of their duties in any aspect.

iv. Adhere to the principles of selflessness, integrity, objectivity, accountability, openness, honesty and leadership, including fair dealing and the ethical handling of conflicts of interest.

v. Do not misuse information gained in the course of duties for personal gain or for political purposes.

vi. Uphold accountability, act in good faith and in the best interests of the Company and the Group.

vii. Ensure the protection of the Company's legitimate business interests, including corporate opportunities, assets and confidential information.

viii. Ensure full, fair, accurate, timely and understandable disclosure.

ix. Declaration of any personal, professional or business interests that may conflict with responsibilities.

The Group encourages whistleblowing which is to report or disclose any violations of the Group's Anti-Bribery and Corruption ("ABC") Policy, Anti-Money Laundering Policy and Code of Ethics and Conduct by any Director, employee and business associates of the Group. Whistle Blowing Channels are established and whistleblowing procedures are spelled out in the Whistle Blowing Policy which is available in the Group's website.

In the event of any violation of the Group's ABC Policy, AML Policy and the Code of Ethics and Conduct by any Director, Management, employee or business associates of the Group, the Anti-bribery & Corruption Management Committee and Audit Committee of the Group shall determine appropriate actions to be taken after considering all relevant information and circumstances.

The Board will review the Code of Ethics and Conduct regularly to ensure that it continues to remain relevant and appropriate.