

HARTALEGA HOLDINGS BERHAD

Registration No. 200601022130 (741883-X)

Sanctioned Policy Statement

Hartalega Holdings Berhad and its subsidiaries conduct business with integrity and in compliance with applicable legal and regulatory frameworks, including sanctions administered by U.S. Office of Foreign Assets Control (OFAC), where applicable. To the best of our knowledge, we do not engage with sanctioned individuals, entities, or jurisdictions. Our compliance efforts are risk-based and include periodic reviews, screenings, and employee training to reduce the risk of inadvertent breaches. Hartalega is committed to addressing any compliance concerns timely and transparently should they arise. While we implement compliance measures to mitigate risk, Hartalega does not assume liability for unknown or undetectable violations arising from external factors beyond our control.

The above has been incorporated into the Company's Internal Contract Management Policy.