



60th Annual General Meeting

AGM Questions Raised By Mr. Tan Chooi Ping
(Shareholder)

6th May 2026



**PROGRESS
WITH
PURPOSE**

Topic	Question 1
The Predicate Offence & AMLA Risk	<p>Under the Second Schedule of AMLA Framework, a breach of Section 58 of the CMSA for unlicensed regulatory activity is classified as a ‘serious offence.’</p> <ul style="list-style-type: none">• Can RHB confirm if our internal controls are designed to recognize that fees or proceeds generated by unlicensed third parties on your platform could technically be classified as ‘proceeds of unlawful activity’ under Section 4(1) of AMLA?• How does RHB ensure the company is protected from the risk of being a facilitator for the collection of such proceeds?

Response

RHB remains committed to upholding robust Anti-Money Laundering and Counter Financing of Terrorism (“AML/CFT”) standards and ensuring an effective governance and control framework in compliance with applicable regulatory requirements, including the Capital Markets and Services Act 2007 (“CMSA”) and the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (“AMLA”).

In this regards, RHB has an AML/CFT framework to identify, assess, monitor, and mitigate money laundering and regulatory risks through customer due diligence, transaction monitoring, governance oversight, escalation protocols, and periodic compliance reviews. RHB notes that any determination of a breach under Section 58 of the CMSA or whether proceeds constitute “proceeds of unlawful activity” under AMLA is dependent on the specific facts and circumstances, as well as determinations by the relevant Authorities.

RHB does not condone any conduct that contravenes applicable securities laws or regulatory requirements. Any identified regulatory concerns are subject to appropriate internal review and escalation and, where required, engagement with the relevant Authorities in accordance with applicable laws.

In addition, RHB also maintains policies and controls to mitigate the risk of misuse of its facilities or infrastructure for unlawful or unauthorized activities, including controls over client onboarding, account operations, ongoing monitoring, and compliance reviews.

Topic	Question 2
Fee Structure & Licensing	<ul style="list-style-type: none">• In terms of intermediary oversight, with regard to arrangements where a third party manages sub-accounts on your platform, what is RHB's policy if the third-party, without holding a CMSL license, imposes volume-based or 'per lot' charges on the ultimate beneficial sub-account holders?• Does RHB's compliance policy recognise that charging fees directly linked to trade execution constitutes 'providing regulated services' under Section 58 of the CMSA?• To ensure clarity for shareholders, is it the Company's policy to permit or prohibit non-licensed entities from charging transaction-linked fees to sub-account holders on your infrastructure?

Response

RHB reiterates its commitment to full compliance with the Capital Markets and Services Act (CMSA) and all applicable regulatory requirements governing its licensed activities.

In line with regulatory expectations, activities that fall within the scope of regulated activities under the CMSA are subject to the relevant licensing and oversight requirements. The assessment of whether a particular arrangement, business model, or fee structure constitutes a regulated activity is based on its specific facts and circumstances, including the nature of the services provided and the roles undertaken by the parties involved.

RHB affirms that all business arrangements and operational structures of the Bank are required to adhere strictly to applicable legal and regulatory standards, including those related to licensing, intermediary oversight, and client dealings. Where third party or intermediary arrangements are engaged, RHB expects such arrangements to meet regulatory expectations and internal governance standards.

Any potential concerns relating to unauthorized activities, inappropriate fee arrangements, or regulatory non compliance are subject to review by RHB's control and compliance functions. RHB does not permit arrangements that contravene applicable laws or regulations and will take appropriate action where any non compliance is identified.

Topic	Question 3
Transparency & Client Protection (BMD Rule 4.14)	<ul style="list-style-type: none">• Regarding client transparency under sub-account structures where the sub-account holder (aka underlying trader) bears the full economic risk of the trades, what is RHB's position on ensuring these traders receive transaction statements directly from the PO as opposed to relying solely on the intermediary?• Does RHB view the absence of direct statements as a potential governance gap that could hide unauthorized fee structures from the ultimate beneficial owners?

Response
<p>For main and all sub-accounts, the statements are sent to the client's registered email address with RHB as per the client's written instruction.</p> <p>The statement is delivered only to the authorised recipients, and all the Bank fees are itemised clearly in the statement.</p>



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