SAMPLE PTE LTD

INTERNAL POLICIES, PROCEDURES AND CONTROLS (IPPC)

For the Prevention of Money Laundering, Proliferation Financing, and Terrorism Financing

Singapore Property Developer — Compliance Manual

Issued under the Housing Developers (Control and Licensing) Act 1965 and the Sale of Commercial Properties Act 1979, and aligned with the URA Guidelines for Developers on Prevention of Money Laundering, Proliferation Financing and Terrorism Financing, Version 1.4 (07 July 2026).

Document Control

Field	Value
Entity name (Licensed Developer)	Sample Pte Ltd
Housing Developer Licence No. (HDCLA) / SCPA registration	1996XXXXXX
Document title	Internal Policies, Procedures, and Controls (IPPC) for Prevention of ML/PF/TF
Document owner	XXX XXX XX
Compliance Officer (management-level)	XXX XXX
Senior management approver	XXX XXX XX – Director
Board approver (if applicable)	Board of Directors – Sample Pte Ltd
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Confidentiality classification	Confidential — Internal Use Only
Distribution	Senior Management; Compliance Function; Sales/Booking Team Leads; Internal Audit; External Auditor on request

Version History

Version	Effective Date	Author	Summary of Changes
2.0	01 June 2026	Amicus Pte Ltd	Initial issue. Compiled and operationalised against URA / COH Guidelines Version 1.3 (30 June 2025).
2.1	20 July 2026	Compliance Function	Revised to align with URA Guidelines for Developers Version 1.4 (07 July 2026). See Appendix M for the full summary of amendments and mapping to Guidelines sections. Entity renamed to Sample Pte Ltd.

Senior Management / Board Approval Resolution

This page records the formal approval of this Internal Policies, Procedures and Controls (IPPC) document, as required under paragraph 5.1.3 of the URA Guidelines for Developers on Prevention of ML/PF/TF (Version 1.4 (07 July 2026)) and the Housing Developers (Prevention of Money Laundering, Proliferation Financing and Terrorism Financing) Rules and the Sale of Commercial Properties (Prevention of Money Laundering, Proliferation Financing and Terrorism Financing) Rules.

Resolution

The Senior Management of Sample Pte Ltd (the "Company"), being a developer licensed under the Housing Developers (Control and Licensing) Act 1965 and/or registered under the Sale of Commercial Properties Act 1979, having considered:

- the ML/PF/TF risks faced by the Company having regard to its purchaser base, jurisdictions, services, transactions, and delivery channels;
- the size and complexity of the Company's business;
- the requirements of the Acts and Rules and the URA Guidelines for Developers Version 1.4 (07 July 2026);

hereby resolves that:

- the Internal Policies, Procedures and Controls (IPPC) set out in this manual are APPROVED and shall take effect from the Effective Date stated on the cover;
- Alicia Low is APPOINTED as the Compliance Officer at the management level, with the authority and reporting line set out in Section 4 of this manual;
- the Compliance Officer is delegated authority to maintain, update, and operationalise this IPPC, subject to material amendments being re-tabled to Senior Management for approval;
- Senior Management shall receive at least an annual compliance report from the Compliance Officer, plus ad hoc escalations on material matters, sanctions hits, and Suspicious Transaction Reports filed; and
- this IPPC shall be reviewed at least once every 2 years, or earlier upon a material trigger event.

Signatures

Approver 1 (Director / CEO)

Name: [_____]

Designation: [_____]

Signature: _____

Date: [DD MMM YYYY]

Approver 2 (Director / CFO)

Name: [_____]

Designation: [_____]

Signature: _____

Date: [DD MMM YYYY]

Compliance Officer (acknowledgement)

Name: [_____]

Designation: [_____]

Signature: _____

Date: [DD MMM YYYY]

Board Chair (if Board approval is sought under internal company policy)

Name: [_____]

Designation: [_____]

Signature: _____

Date: [DD MMM YYYY]

Note (URA Version 1.4 (07 July 2026), para 5.1.3, footnote 5): The IPPC must be approved by the Senior Management of the developer. Developers may also seek approval from their Board of Directors for the policies, procedures and controls, depending on their internal company policy.

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