

Policy No. 8 : Policy on Sensitive Transactions

Introduction and Objective

To state Affluent Cycle Industries Sdn. Bhd. (ACI) position on sensitive transactions and related matters, and to establish key pillars in its structure to protect the Company.

Sensitive transactions are usually in the nature of kickbacks, gifts of significant value, bribes or payoffs made to favorably influence some decision affecting a company's business or for the personal gain of an individual.

- ACI policy prohibits the Company and its employees and agents from corruptly offering or giving anything of value to political party/government officials inside/outside or an official of public international organizations.
- Sensitive transactions may be direct or indirect, for the purpose of influencing officials in their official capacity or in violation of their lawful duties or to secure any improper advantage in order to help the company obtain or retain business or direct business to any person.
- ACI policy prohibits any employer or agent from making any payment or engaging in any transaction that is prohibited by the law.
- Establish the process necessary to deliver the results in accordance with the requirements and implement the process to ensure proper handling of sensitive transactions.
- Monitor and measure the process against the requirement and take actions to continually improve the system.

Approved by:

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