



## **1. Introduction and Objectives**

Affluent Cycle Industries Sdn. Bhd. (ACI) is committed to doing our business in a fair, open, honest and transparent manner.

ACI believes that sustainable success in business is only possible where there is free and fair competition. Based on these fundamental principles and our legal obligations, ACI does not tolerate any form of corruption or bribery or fraudulent act and the overall objective is to prevent any officer, director, agent or person performing services for the Company, or in its name, from giving or receiving bribes of any kind.

## **2. Purpose of the Anti-Bribery and Corruption Policy**

The purpose of this Anti-Bribery and Corruption Policy (the “Policy”) is to lay down the rules to be applied at ACI in order to prevent corruption in all activities under ACI’s control.

ACI requires that all employees and companies within the ACI Group act in compliance with this Policy.

Violations of this Policy will always be taken seriously and may lead to disciplinary action; in case of serious breaches up to and including termination of employment.

## **3. Key Principles**

- ACI shall conduct its business in an honest and ethical manner, full legal compliance, healthy competition without abuse of power, transparency and respect for the rule of law wherever it operates.
- ACI is committed to preventing fraud and corruption from occurring and to developing an anti-fraud culture.
- Bribery and any other form of corrupt business practice are strictly prohibited. Neither ACI nor anyone acting on ACI’s behalf may accept, authorize, promise, offer or make available any payments, gifts or other benefits that could influence or appear to influence business decisions or the actions or decisions of a public official.
- ACI does not permit the making of facilitation payments to induce public officials to perform their duties.



#### **4. Gifts, Entertainment and Hospitality**

No ACI employee or any other person acting on ACI's behalf may promise, offer or grant gifts or benefits of any kind if it could influence, or appear to influence, the receiver to do something in return, such as awarding of a contract.

Gifts and hospitality may only be accepted when they comply with local ACI policy. Giving, offering, receiving or soliciting gifts, entertainment and hospitality are prohibited if they are:

- not approved in advance by the Managing Director.
- excessive or lavish by reference to the recipient, or in the context in which they are offered; or
- promised, granted or offered with the purpose of influencing a decision relevant to the business.

#### **5. Public Officials**

Neither ACI nor any person acting on ACI's behalf may offer a bribe of any kind to a public official or to any other person at the request or suggestion of a public official, or offer hospitality or gifts that are lavish or breach the gifts and entertainment policy by which the public official is bound.

Public officials are people who perform a public function, e.g. judges, tax or customs officials, regulators, planning officers, legislators and employees of state-owned organizations.

#### **6. Charitable and Political Donations**

Charitable donations must not be promised or granted with the purpose of influencing a decision relevant to the business of ACI.

Charitable donations must be approved by the Managing Director.



## **7. Business Practice**

It is the policy of the Company to treat all current or potential business partners fairly and without prejudice. The Company requires that all employees, irrespective of their function, grade or standing, observe the following standards of business and personal ethics in the conduct of their duties and responsibilities:

- The employees must practice honesty and integrity in every aspect of dealing with other employees, customers, suppliers, other business partners, communities and government authorities.
- Neither the Company nor any of its employees shall make illegal or improper payments or bribes or frauds or money laundering and will refrain from participating in any corrupt business practices. Neither the Company nor any of its employees may accept payments, gifts or other kinds of reimbursement from a third party that could affect or appear to affect their objectivity in business decisions.
- The employees should avoid entering into situations where their personal, family or financial interests may be in conflict with that of the Company. Where any such potential conflict of interest arises, the employee should disclose this and seek authorization from the Managing Directors.

## **8. Communication**

All employees within ACI shall receive information on this Policy.

It is the responsibility of each Head of Department within ACI to ensure that its employees are informed, understand and adhere to this Policy.

ACI shall provide anonymous complaint mechanism for employees to report actual or suspected violations of this policy. Such channel shall protect whistleblower's confidentiality and prohibit retaliation.

## **9. Training and Awareness**

ACI shall ensure that all employees is aware of the Anti-Bribery and Corruption policy.

Training shall be provided on a regular basis, in accordance with the level of bribery and corruption risk related to the position and function.

## **10. Whistleblowing Procedure**

To encourage openness and transparency and in order to facilitate the reporting of potential or suspected violations of this Policy, ACI has established an accessible and trusted whistleblowing channel, to raise concerns in relation to real or suspected cases of bribery and corruption without fear of retaliation.

Details of the whistleblowing procedure are available in the Company's Whistleblowing Procedure ACI-MT-P011.

## **11. Responsibility and Accountability**

As the Managing Director, I assume full responsibility and accountability for compliance to all the stipulations of this Anti-Bribery and Corruption Policy.

Approved by:

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Teoh Khim How,  
Managing Director.