AFFINITY OFFSHORE SDN BHD

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ANTI-CORRUPTION POLICY

Affinity Offshore Sdn Bhd provides architectural services of the highest standard to the offshore marine industry.

1. COMMITTING to promoting values of integrity, transparency and good governance

- 1.1 To prohibit bribery and corruption in any form, whether direct or indirect, in the business place and in all business relationships, including with suppliers, contractors, customers and other third parties;
- 1.2 To ensure full compliance with codes of ethics at all times; and
- 1.3 To create a positive culture that upholds integrity in order to create a clean business environment.

2. STRENGTHENING internal systems that support corruption prevention

- 2.1 To develop an anti-corruption programme that articulates values, policies and procedures to be used to prevent corruption from occurring in all business activities;
- 2.2 To improve existing systems and procedures to prevent any corrupt practices;
- 2.3 To include corruption prevention, ethics and integrity as areas for training and development for management, employees and staff;
- 2.4 To create a secure and accessible channel through which employees and others may report violations in confidence and without risk of reprisal.

3. COMPLYING with laws, policies and procedures relating to fighting corruption

- 3.1 To ensure that all laws and company policies and procedures relating to fighting corruption are strictly complied with; and
- 3.2 To ensure that the good governance is practiced, checks and balances put in place, and business is conducted with transparency and accountability to avoid conflicts of interest, abuses of power and misconduct.

4. FIGHTING any form of corrupt practice

- 4.1 To take proportionate action against any employee, staff or other person involved in corruption in relation to the business, regardless of position and status; and
- 4.2 To report any corrupt practice that occurs in the business place to the appropriate authority.

5. SUPPORTING corruption prevention initiatives by the Malaysian Government and Malaysian Anti-Corruption Commission (MACC)

- 5.1 To support anti-corruption efforts by the Government and MACC; and
- 5.2 To maintain relationships with the authorities, regulators and MACC and provide full cooperation in relation to corruption detection, prevention and enforcement of laws.

Responsibility for establishing and implementing this Quality Policy rests with the Managing Director.

Approved By:

Managing Director

Simon Hay

Date: 24-11-2020

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