



KEBIJAKAN TERKAIT TRANSAKSI AFILIASI

Semua transaksi afiliasi yang dilakukan oleh Perseroan dan/atau perusahaan terkendali dengan pihak terafiliasinya dilakukan secara wajar (Arm's Length) dan sesuai dengan ketentuan peraturan perundang-undangan yang berlaku dan kebijakan serta prosedur yang berlaku di PT Cisarua Mountain Dairy Tbk ("Perseroan").

Dimana prosedur yang perlu dilalui dalam melakukan transaksi afiliasi antara lain yaitu:

1. Membandingkan ketentuan dan persyaratan transaksi yang setara dengan transaksi yang dilakukan antara pihak yang tidak mempunyai hubungan Afiliasi.
2. Melakukan penelaahan kesesuaian Transaksi Afiliasi terhadap ketentuan praktik bisnis yang berlaku umum serta memenuhi prinsip transaksi yang wajar (Arm's-Length principle).

Adapun batasan yang perlu diperhatikan antara lain yaitu:

1. Jika transaksi tersebut merupakan transaksi afiliasi, maka harus dipastikan kemungkinan terjadi potensi benturan kepentingan. Jika transaksi tersebut tidak terdapat potensi benturan kepentingan, maka harus dipastikan tindak lanjut transaksi afiliasi sesuai kebijakan dan prosedur yang berlaku.
2. Jika transaksi afiliasi ini memiliki potensi benturan kepentingan, maka kajian harus dilakukan oleh Penilai Independen dan melalui prosedur sesuai dengan ketentuan perundangundangan yang berlaku.
3. Jika transaksi tersebut merupakan transaksi afiliasi yang nilainya masuk dalam Batasan materialitas sesuai Peraturan Otoritas Jasa Keuangan yang berlaku, maka harus tunduk ketentuan perundang-undangan yang berlaku.

TRANSACTION AFFILIATED PARTIES POLICY

All affiliated transactions carried out by the Company and/or controlled companies with their affiliated parties are carried out fairly (Arm's Length) and in accordance with the provisions of the applicable laws and regulations and policies and procedures applicable in PT Cisarua Mountain Dairy Tbk ("the Company").

Where the procedures that need to be passed in conducting affiliate transactions include:

1. Comparing terms and conditions of transactions that are equivalent to transactions conducted between parties who have no affiliation.
2. Reviewing the suitability of Affiliated Transactions against the provisions of generally accepted business practices and complying with the Arm's-Length principle.

The limitations that need to be considered include:

1. If the transaction is an affiliated transaction, it must be ensured that there is a potential conflict of interest. If the transaction does not contain a potential conflict of interest, it must be ensured that the follow-up of the affiliate transaction is in accordance with the policies and procedures.
2. If this affiliated transaction has a potential conflict of interest, the review must be carried out by an Independent Appraiser and through procedures in accordance with the provisions of the applicable laws and regulations.
3. If the transaction is an affiliated transaction whose value falls within the materiality limits in accordance with the applicable Financial Services Authority Regulations, it must comply with the provisions of the applicable laws and regulations.