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Policy

# Anti-Bribery and Anti- Corruption

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Department

Group Risk

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**Anti-Bribery and Anti-Corruption**

**Issue 02 Revision 00**

**01 March 2025**

**Approval for**

**All companies within Capital A Berhad**

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**Prepared by**

*SIGNATURE NOT DISPLAYED*

.....  
**Danny Ebinesan**

Head of Group Risk,  
Risk Management

**Reviewed by**

THE RISK MANAGEMENT AND SUSTAINABILITY COMMITTEE OF  
CAPITAL A BERHAD  
ON 13 FEBRUARY 2025

**Approved by**

BOARD OF DIRECTORS OF CAPITAL A BERHAD  
ON 26 FEBRUARY 2025  
APPROVAL REF.: BOD MINUTES NO. 01/2025

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	<b>Anti-Bribery and Anti-Corruption</b> Revision History	Doc. No. AA/GRR/S/002 Date 01 Mar 25 Issue 02 Rev 00 Page 1
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## REVISION HISTORY

Revision History records the trail of revisions made to the SOP, the reason of the revisions and the tracking of Process Change Request (PCR) submitted by the Process Owner. Revision History is the responsibility of the Document Control Centre to ensure all SOP revisions are justified and documented in accordance to proper document control procedures.

Issue No.	Rev. No.	PCR No.	Date	Effective Date	Reason for Revision
01	00	DMS-837	01 Jul 23	01 Aug 23	Initial issue. The Document No. AA/LGL/S/011, Issue 01 Revision 00 should be obsolete once this document is effective. Kindly note that the new Document No. AA/GRR/S/002 has superseded the AA/LGL/S/011.
02	00	DMS-3494	01 Mar 25	10 Apr 25	1. Ensure alignment between operating landscape and latest regulatory requirements. 2. Compliance with regulatory expectation for policy to be up to date.

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	<b>Anti-Bribery and Anti-Corruption</b> Revision Highlights	Doc. No. AA/GRR/S/002 Date 01 Mar 25 Issue 02 Rev 00 Page 2
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## REVISION HIGHLIGHTS


All changes recorded in this Revision Highlight will be for the latest revision only. Each change listed below will be highlighted with a Change Bar.

Type of Change:      ○ Addition                      △ Revision                      ⊗ Deletion

Page No.	Item No.	Type of Change	Description of Changes
All	-	△	The logo has been changed to Capital A Berhad's logo.
-	Cover page	△	Revised according to the latest issue.
-	Approval page	△	Revised according to the latest issue.
1	Revision History	△	Revised according to the latest issue.
2	Revision Highlights	△	Revised according to the latest issue.
5	Table of Content	△	Revised according to the latest issue.
6	Abbreviation	△	Table has been updated.
7-10	Definition of Terms	△	Table has been updated.
11	1.0	△	Title has been revised from "Objectives" to "Overview".
12	2.0	△	The cope of policy has been revised.
15	3.0	⊗	Item has been deleted.
13	3.0		Numbering has been revised from "4.0" to "3.0".
16	5.0	⊗	Item has been deleted.

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Page No.	Item No.	Type of Change	Description of Changes
17	6.0	⊗	Item has been deleted.
20	7.0	⊗	Item has been deleted.
30	8.0	⊗	Item has been deleted.
33	9.0	⊗	Item has been deleted.
34	10.0	⊗	Item has been deleted.
36	11.0	⊗	Item has been deleted.
37	12.0	⊗	Item has been deleted.
41	13.0	⊗	Item has been deleted.
42	14.0	⊗	Item has been deleted.
24	7.0	△	Numbering has been revised from “15.0” to “7.0”.
24	8.0	△	Numbering has been revised from “16.0” to “8.0”.
25	9.0	△	Numbering has been revised from “17.0” to “9.0”.
44	17.1	⊗	Item has been deleted.
46	17.2	⊗	Item has been deleted.
25	9.1	○	Item has been added.

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	<b>Anti-Bribery and Anti-Corruption</b> Distribution Control List	Doc. No. AA/GRR/S/002 Date 01 Mar 25 Issue 02 Rev 00 Page 4
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## DISTRIBUTION CONTROL LIST

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	<b>Anti-Bribery and Anti-Corruption</b> Abbreviations	Doc. No. AA/GRR/S/002 Date 01 Mar 25 Issue 02 Rev 00 Page 6
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## ABBREVIATIONS

Abbreviation	Full Term
ABAC	Anti-Bribery and Anti-Corruption
CEO	Chief Executive Officer
CSR	Corporate Social Responsibilities
DCC	Document Control Centre
DMS	Document Management System
GECH	Gifts, Entertainment and/or Corporate Hospitality
KLIA	Kuala Lumpur International Airport, Terminal 1
klia2	Kuala Lumpur International Airport, Terminal 2
KPI	Key Performance Index
KUL	IATA Code for Kuala Lumpur International Airport
LOA	Limits of Authority
MACC	Malaysian Anti-Corruption Commission
OQA	Operational Quality Assurance
PCR	Process Change Request
SOP	Standard Operating Procedures

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	<b>Anti-Bribery and Anti-Corruption</b> Definition of Terms	Doc. No. AA/GRR/S/002 Date 01 Mar 25 Issue 02 Rev 00 Page 7
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## DEFINITION OF TERMS


Term	Definition
<b>Business Partners</b>	Parties that the Group conducts business with, who are not Suppliers or customers of the Group, including, without limitation, joint venture partners and shareholders in joint venture arrangements or companies.
<b>Conflict of Interest</b>	As defined under the Conflict-of-Interest Policy issued under People Department.
<b>Directors</b>	Every director of the Group (including executive and non-executive), except as otherwise stated in this policy. For avoidance of doubt, mention of 'director' in the ensuing pages of this Policy also includes his or her Immediate Family, which is defined below.
<b>Employees</b>	Any person who is employed under a contract of service by the Group and / or entities within the Group. This includes confirmed permanent employees, those under probation, employees on contract position, interns as well as secondees. For avoidance of doubt, mention of 'employee' in the ensuing pages of this Policy also includes his or her Immediate Family, which is defined below.
<b>External parties with existing or prospective business relationship with the Group</b>	Include the following current third parties as well as those in negotiation for an upcoming deal or transaction in the near future, but not limited to: <ul style="list-style-type: none"> <li>a. Business partners (as defined above);</li> <li>b. Vendors, suppliers, contractors or service providers;</li> <li>c. Regulators, governmental or public officials;</li> </ul>

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	<b>Anti-Bribery and Anti-Corruption</b> Definition of Terms	Doc. No. AA/GRR/S/002 Date 01 Mar 25 Issue 02 Rev 00 Page 8
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Term	Definition
	d. Agents and intermediaries; e. Customers, clients and guests; f. Non-profit / non-governmental organizations; or g. Press media.
<b>Gifts, Entertainment and Corporate Hospitality (GECH)</b>	Anything of value, in any form of compensation and benefit including but not limited to cash / cash equivalent, wedding gifts, festival money packets, hampers, travelling and lodging facilities, free fares, college fee funding, club membership, excursion tickets to any event (e.g. sports, music / cultural events), entertainment (e.g. karaoke, meals, massages), any form of commission, healthcare reimbursements, promotional items, vouchers / discounts, movable / immovable properties, home improvements, decorative items, house renovation, facilitation pay.
<b>Group</b>	Refers to Capital A Berhad and all its subsidiaries.
<b>Immediate Family</b>	Spouse, parent, child (including legally-adopted children), sibling, grandparent and parent-in-law of the specified individual.
<b>Political Contribution</b>	May exist in the following forms but not limited to: a. financial donations; b. secondments to political parties; c. loans of money at less than market interest rates; d. discounted fees or rates for products, services or loans; e. sponsorship of an event or publication; f. subscriptions or affiliation payments;

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Term	Definition
	<ul style="list-style-type: none"> <li>g. free or discounted use of facilities or services such as offices, transport, printing, telecommunications, advertising and media coverage; or</li> <li>h. sponsorship or support for fundraising events, such as a fundraising dinner.</li> </ul>
<b>Public Official</b>	<p>Any person who is a member, an officer, an employee or a servant of the following public body:</p> <ul style="list-style-type: none"> <li>a. the Government of Malaysia;</li> <li>b. the Government of a State;</li> <li>c. any local authority and any other statutory authority;</li> <li>d. any department, service or undertaking of the Government of Malaysia, the Government of a State or a local authority;</li> <li>e. any society registered under Section 7(1) of the Societies Act 1966;</li> <li>f. any branch of a registered society established under Section 12 of the Societies Act 1966;</li> <li>g. any sports body registered under Section 17 of the Sports Development Act 1997;</li> <li>h. any co-operative society registered under Section 7 of the Co-operative Societies Act 1993;</li> <li>i. any trade union registered under Section 12 of the Trade Unions Act 1959;</li> <li>j. any youth society registered under Section 9 of the Youth Societies and Youth Development Act 2007;</li> </ul>

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Term	Definition
	<p>k. any company or subsidiary company over which or in which any public body as is referred to in paragraph a., b., c., d., e., f., g., h., i. or has controlling power or interest; or</p> <p>l. any society, union, organization or body as the minister may prescribe from time to time by order published in the Gazette.</p>
<b>Transparency International</b>	A global movement working in over 100 countries to end the injustice of corruption. It is an independent, non-governmental, non-profit organization with multiple international partners with the objectives to stop corruption and promote transparency, accountability and integrity at all levels and across all sectors of society.

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## 1.0 OVERVIEW

- 1.1 'Corruption' refers to any action which would be considered as an offence of giving or receiving 'gratification' or bribery in an attempt to illicitly influence the decisions or actions of a person in a position of trust within an organization. Examples of corruption include but are not limited to acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.
- 1.2 Definition in paragraph 1.1 above on 'corruption' is consistent with and derived from the relevant regulatory bodies and international standards as follows (not exhaustive):
  - a. Malaysian Anti-Corruption Commission: The act of giving or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to his / her job description. 'Gratification' in this context generally refers to anything of value, advantage, benefit or interest, whether monetary or non-monetary, tangible or non-tangible as provided under paragraphs (a) to (f) of section 3 of the Malaysian Anti-Corruption Commission Act 2009.
  - b. Transparency International: Abuse of entrusted power for personal gain.
- 1.3 Each country and jurisdiction heavily penalize corruption with imprisonment, fines or both. Therefore, it is imperative for the Group operating in various jurisdictions to ensure strict compliance with this ABAC Policy and the local anti-corruption regulations at all times.
- 1.4 Aside from the heavy regulatory penalties, bribery and corruption on their own also carry adverse repercussions to any company in the form of negative reputation and tarnished credibility, which have a direct impact on the company's business sustainability.
- 1.5 The Group is committed to the highest standards of ethical conduct and integrity in all aspects of its business activities and operations. To this end, the Group establishes this policy to codify its zero tolerance for any form of bribery and corrupt practices.

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## 2.0 SCOPE

2.1 This policy shall apply to:

- a. All Employees of the Group;
- b. All Directors of the Group;
- c. Agents, intermediaries or parties servicing or acting on behalf of the Group;
- d. Immediate family of paragraph 2.1 (a), (b) and (c);
- e. Subsidiaries, affiliates and companies within the Group; and
- f. Business partners, suppliers, vendors, joint venture partners, contractors and third parties having business relationship with the Group.

2.2 This policy shall govern the following:

- a. Giving of GECH by those listed in paragraph 2.1 (a) to (e) to any external party with existing or prospective business relationships with the Group;
- b. Receipt of GECH from any external party with external party with existing or prospective business relationships with the Group;
- c. Conflict of interest;
- d. Dealing with Public Officials;
- e. Political donations and sponsorships; and
- f. Corporate social responsibilities

2.3 Further guidance on applicability of the ABAC requirements is provided under Appendix 1 of this ABAC Policy.


2.4 Where there is conflict between this ABAC Policy and the individual policy maintained by the respective subsidiaries, the more stringent set of requirements shall apply.

- a. Where the subsidiaries do not have a separate ABAC Policy on their own, this ABAC Policy shall be adopted by default.
- b. For circumstances illustrated under paragraph 2.4 (a), in the event there is a conflict between this ABAC Policy and the local regulations where the subsidiaries operate, the more stringent set of requirements shall apply.

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- 2.5 In this ABAC Policy, unless otherwise stated, the English version shall be the official text for reference in the event of any dispute arising out of the interpretation of this ABAC Policy.

### 3.0 REFERENCE DOCUMENTS

Title	Document ID
AirAsia Aviation Group Conflict of Interest Policy	AA/PPL/S/023
Anti-Fraud Policy	AA/IAU/S/004
Board Charter	AA/GCS/S/002
Code of Conduct and Ethics	AA/PPL/S/004
Code of Ethics for Company Director & Company Secretary	n/a
Compliance Risk Management Policy	AA/GRR/S/003
Conflict of Interest Policy	AA/PPL/S/019
Directors' Fit and Proper Policy	n/a
Disciplinary Policy	AA/PPL/S/005
Indonesian Corruption Eradication Commission (KPK) Regulation No. 2/2019 on Gratification Reporting	n/a
Indonesian Law No. 28/1999 on Good Governance, Anti-Corruption, Collusion and Nepotism	n/a
Indonesian Law No. 31/1999 on Corruption Eradication (as amended by Law No. 20/2001)	n/a

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Title	Document ID
Indonesian Supreme Court Regulation No. 13 of 2016 on Procedures for Handling Corporate Crimes	n/a
Malaysian Anti-Corruption Commission Act 2009 (incorporating Amendment Act 2018) (MACC Act 2009")	n/a
Malaysian Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001	n/a
Malaysian Bursa Main Market Listing Requirements & Practice Notes	n/a
Malaysian Code of Corporate Governance	n/a
Malaysian Penal Code	n/a
Malaysian Prime Minister Department: Guidelines on Adequate Procedures (pursuant to s.17A(5) of the MACC Act 2009)	n/a
Philippines Republic Act No. 3019 - Anti-Graft and Corruption Practices Act of 1960	n/a
Procurement	AA/PRO/S/001
Supplier Code of Conduct Policy	AA/PRO/F/006
Thailand Guidelines on Appropriate Internal Control Measures for Juristic Persons to Prevent Bribery of Public Officials, Foreign Public Officials or Officials of Public International Organizations	n/a
Thailand Organic Act on Counter Corruption B.E. 2542 (1999) (as amended by No. 3, B.E. 2558 (2015))	n/a

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Title	Document ID
Transparency International	n/a
Whistleblowing Policy	AA/IAU/S/005

## 4.0 POLICY REQUIREMENTS

- 4.1 The Group prohibits any form of bribery or corruption, directly and indirectly, including but not limited to:
- Offering, promising or giving any undue advantage in the form of money, lavish or personal gifts, entertainment and favors to any Public Official, employee or agent acting on behalf of another company with existing or prospective business relationships with the Group, with the intention of obtaining, retaining or securing an unfair business privilege or interest;
  - Soliciting, accepting or receiving any undue advantage in the form of money, lavish or personal gifts, entertainment and favors from any person for business-related purposes; or
  - Engaging in any other activities related to bribery or corruption such as the following to obtain, secure or retain an unfair advantage
    - Falsifying records or documents
    - Abuse of authority, power or position
    - Engaging in conflict of interest
- 4.2 The Group is cognizant of circumstances where GECHs are offered by external parties in good faith or as expression of appreciation, goodwill in conjunction with festive seasons, occasions or events or actual collaboration with business partners. For such circumstances, an Employee must submit a Gift Declaration to the Integrity and Compliance Unit via the prescribed platform, within three (3) working days such GECH is made available or known to the recipients.

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- 4.3 The following categories of GECH (not exhaustive) are viewed to stand a higher risk of corruption where they shall not be considered and must be returned upfront upon advice from the Integrity and Compliance Unit as the case may be:
- The GECH is excessive in value or lavish in nature;
  - The GECH is not relevant to the prevailing occasion or lacks a substantiated background or reason;
  - The GECH is highly customized or specially personalized for a particular individual only;
  - The GECH is in the form of cash or cash equivalents such as e-wallet or bank transfers to a specified individual Employee's account;
  - The GECH could be perceived as a form of illegal facilitation payment aimed to induce or influence the Employee(s) / Director(s) or department / entity within the Group towards certain actions or directions in the favor of the GECH provider outside of ordinary commercial considerations or merit-basis; or
  - The GECH is in contravention of local laws and regulations for jurisdictions with more stringent ABAC requirements.
- 4.4 Exception to paragraph 4.2 above on the Gift Declaration requirement is when an Employee receives the following (not exhaustive):
- Gifts given by the Group or another Employee or Director within the Group in appreciation or commemoration of long service, in conjunction with festive seasons or occasion, or in an internally-organized event such as exhibitions, lucky draws, annual dinners and contests;
  - Gifts of minimal value given by an external party as a door gift or token for attending or participating in an event organized by the said external party, such as lanyard, pen and notebooks where such door gifts or token are given to all attendees or participants; or
  - Gifts on a personal basis from a person who has no existing or prospective dealings or business relationship with the Group.

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- 4.5 As part of preserving goodwill and ongoing business relationship, the Group may at times be required to reciprocate or sponsor GECH to another external party. For this purpose, the sponsoring entity / department within the Group through the designated Employee must submit a Gift Declaration to the Integrity and Compliance Unit via the prescribed platform at least seven (7) working days prior to the actual sponsorship date. The Gift Declaration submission must be substantiated by approval from the relevant approving authority or the CEO, in accordance with the LOA.
- 4.6 The following sponsorships of GECH (not exhaustive) are viewed to stand a higher risk of corruption where they shall not be considered, upon advice from the Integrity and Compliance Unit as the case may be:
- The sponsorship is excessive in value or lavish in nature;
  - The sponsorship has no direct connection to the prevailing occasion or lacks a substantiated background or reason;
  - The sponsorship is targeted for a particular individual only without clear merits;
  - The sponsorship is in the form of cash or cash equivalents such as e-wallet or bank transfers to a specified individual's account;
  - The sponsorship could be perceived as a form of illegal facilitation payment aimed to induce or influence the recipient(s) towards certain actions or directions in the favor of the Group, outside of ordinary commercial considerations or merit-basis; or
  - The sponsorship is in contravention of local laws and regulations for jurisdictions with more stringent ABAC requirements or practicing no-gift policy.
- 4.7 If an Employee opted to provide or sponsor GECH to any external party with existing or prospective business relationships with the Group under his or her own personal capacity (without using the Group / entity / department's funds), the Employee is still required to submit a Gift Declaration to the Integrity and Compliance Unit within the same timeframe as provided under paragraph 4.5 and the Gift Declaration shall be subject to similar prohibitions under paragraph 4.6.

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- 4.8 Exception to paragraphs 4.2, 4.5 and 4.7 above on the Gift Declaration requirement is donation of wreath.
- 4.9 Dealings with public officials are inherently more susceptible to corruption risk and are subject to more intensified public scrutiny. In this regard:
- a. For countries with explicit zero gift requirement in their regulations, no GECH shall be solicited or accepted from, or offered or given to the public officials by Employees, Directors and agents / intermediaries acting on behalf of the Group;
  - b. For countries without such explicit zero gift requirement in their regulations, accepting and sponsoring of GECH to public officials are generally discouraged within the Group as it may entail misperception regardless of the underlying genuine intention and integrity. The relevant entity / department within the Group is required to raise a Gift Declaration in the prescribed platform at least seven (7) working days prior to the actual sponsorship date and consult Integrity and Compliance Unit for approval if the entity/department wishes to appeal on this policy stance; and
  - c. Paragraphs 4.9 (a) and (b) do not apply where there is an official mandate from the Government or regulatory authorities in any country specifically requiring the Group or its companies to cover the requisite expenses of the public officials in the course of their official duties related to the Group (e.g. regulatory audit or inspection). For such circumstances, the relevant entity / department is required to raise a Gift Declaration in the prescribed platform at least seven (7) working days from the date of notification on the regulatory visit and requisite expenses.
- 4.10 This ABAC Policy continues to be supportive of the Group's CSR and requires the departments / entities within the Group carrying out the CSR to comply with all the following:
- a. Perform sufficient due diligence and background checks on the intended recipients with clear assessment and verification criteria to ensure the legitimacy of their existence and authenticity of the charitable causes or business objectives

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(if the sponsorship involves benefit in return to the Group in the form of branding or advertisement of products and services);

- b. Safe keeping of all documents and records on the due diligence, checks and transactions performed; and
- c. In the event where the CSR involves sponsorship in the form of cash or monetary donations or GECHs, to submit a Gift Declaration to the Integrity and Compliance Unit for approval at least seven (7) days prior to the sponsorship date.


4.11 The Group continues to encourage all Employees to participate in their local political process in line with basic human rights on freedom and democracy. Employees are free on their own will to make a personal political contribution as appropriate within limits of the law, but cannot under any circumstances represent directly or indirectly the Group. Nor will any compensation or reimbursement be made in any manner by the Group for a personal political contribution. The Group as a whole maintains a neutral stance on political matters and prohibits direct or indirect contributions in any form to any political party, organization or individual, as such conduct may be perceived as an attempt of obtaining an unfair advantage in business transactions.

4.12 For Directors, they are advised to exercise professional care and judgement in each receipt and sponsorship of GECH, taking into account pertinent circumstances including character of the GECH, its purpose, the potential public perception and repercussions, applicable laws and cultural norms. In particular, the following are to be given due attention:

- a. Directors are to be guided by the prohibitions in paragraphs 4.3 and 4.6 and to disclose their receipts of GECH from external parties with existing or prospective business relationships with the Group to the Group Company Secretary as soon as practicable; and
- b. In the event where Directors wish to sponsor a GECH to an external party with existing or prospective business relationships with the Group, Directors are required to obtain prior approval from the Board.

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- 4.13 All Employees and Directors must refrain from acts that would result in actual or perceived conflict of interest with the Group.
- 4.14 Through the Whistleblowing Policy, the Group wishes to encourage all parties, both internal and external stakeholders of the Group, to report their concerns on actual and suspected violations of this ABAC Policy and breach of integrity through the dedicated email, [whistleblower@airasia.com](mailto:whistleblower@airasia.com), or the whistleblower electronic form available on the corporate website.
- 4.15 Employees / departments / entities within the Group should consult the Integrity and Compliance Unit on any uncertainty regarding receipt or sponsorship of GECH in the course of their duties and business operations.


## 5.0 KEY RESPONSIBILITIES

- 5.1 Integrity and Compliance Unit of the Risk Management Department.
- Develop and revise the ABAC Policy every three (3) years or as and when required;
  - Administer gift declaration system;
  - Develop training and awareness materials to disseminate to all Employees within the Group on ABAC requirements;
  - Perform corruption risk assessment and monitoring;
  - Perform periodic reporting and assurance to the Board of Directors and the delegated Board Committee;
  - Serve as point of advisory to all line departments on ABAC matters; and
  - Support any other line departments for internal and external reporting on ABAC matters.

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## 5.2 People Department.

- a. Assist in rolling out awareness training on ABAC to new joiners during onboarding and ensure the new joiners' completion of ABAC Policy acknowledgement in the prescribed system or platform;
- b. Administer the Conflict-of-Interest Policy, which among others include ensuring compliance by all Employees and directors with the policy and making assessment on the declarations made as well as proposals on managing the conflict of interest that arises; and
- c. Support any other line departments for internal and external reporting related to ABAC matters.

## 5.3 Group Governance and Company Secretarial.


- a. First point of contact for any ABAC-related queries from the directors. Company Secretary may thereafter consult the Integrity and Compliance Unit for further clarification, where required;
- b. In relation to paragraph 4.12 above, Company Secretary is required to submit a Gift Declaration in the prescribed platform on behalf of the relevant director to the Integrity and Compliance Unit for record purposes only within seven (7) working days from the date of notification by the respective director (for receipt of GECH) or Board's approval (for sponsorship of GECH);
- c. Ensure new and existing directors' acknowledgement of ABAC Policy in their letters of appointment or reappointment; and
- d. Assist and support the Board Nominating Committee in discharging its duties, particularly on adequate background checks on the prospective Board candidate(s)' personal integrity in accordance with the Directors' Fit and Proper Policy.

## 5.4 Regional Fraud and Investigation Unit.

- a. Receive, investigate and handle cases reported in the designated whistleblowing channels as well as other duties as outlined in the Whistleblowing Policy;

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- b. Assist in rolling out awareness on the scope of whistleblowing and the available channels to new joiners during onboarding; and
- c. Support any other line departments for internal and external reporting on ABAC matters.

5.5 All Employees are required to:


- a. Ensure whole section 4 above is complied with should there be circumstances involving giving or receiving GECH from external parties;
- b. Complete their mandatory attestation that they are compliant with this ABAC Policy within the prescribed duration;
- c. Complete their mandatory ABAC e-learning / training that is rolled out within the prescribed duration;
- d. Ensure compliance with all the related policies and regulations (as stated in section 3.0 of this policy);
- e. Consult the Integrity and Compliance Unit if there is any doubt or question regarding this policy; and
- f. Conduct themselves with integrity at all times. Where actual or perceived conflict of interest arises, to immediately declare in the platform and in accordance with the requirements as prescribed by the People Department in the Conflict-of-Interest Policy and making abstention from the related decision-making or processes.

5.6 Senior Management and Heads of Department are responsible to ensure that:

- a. Sufficient support is rendered to the Integrity and Compliance Unit for the discharge of their responsibilities, where applicable;
- b. All Employees under their supervision complete the mandatory ABAC tasks such as attestation and e-learning / training within the prescribed duration;
- c. All Employees under their supervision comply with the ABAC Policy, in particular, on the gift declaration requirements; and

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d. Sufficient processes and controls including documentation are maintained to mitigate inherent corruption risk within each aspect of business operations.

5.7 Third parties with existing or prospective business relationship with the Group (suppliers, business partners, agents / intermediaries) are responsible to:

a. Complete acknowledgement and acceptance of this ABAC Policy together with the Supplier Code of Conduct upon inception and renewal of business relationship.

5.8 Key responsibilities of the Board of Directors and the delegated Board Committee:

a. Overall oversight and accountability on the Group's ABAC compliance, with adequate framework, policies and procedures in place and effective implementation, leveraging on assurance from the management, relevant control functions and independent parties, as the case may be, in accordance with the regulations which include, amongst others, section 17A of the MACC Act 2009, Chapter 15 of the Malaysian Bursa Main Market Listing Requirements and Malaysian Code of Corporate Governance.

## 6.0 BREACHES AND REPORTING


6.1 All parties named under the scope of this ABAC Policy as per paragraph 2.1 shall comply with all applicable laws, policies and procedures of the Group.

6.2 Breach of the MACC Act 2009, among other legislations, carries severe penalties in the form of fines, imprisonment or both, not only to the offender but also to the Management and Directors through section 17A of the said Act.

6.3 In addition to paragraph 6.2, failure to comply with any paragraph under this ABAC Policy may result in disciplinary actions being taken against such individuals.

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**Table 6.0-1: Consequences of A Breach**

<b>Employees</b>	Any breach of this ABAC Policy by an Employee may result in disciplinary actions being taken against such Employee in accordance with the Group's Disciplinary Policy.
<b>Business Partners, Suppliers, Agents, Intermediaries</b>	Any breach of this ABAC Policy by a Business Partner, Supplier, Agent or Intermediary acting on behalf of the Group may result in the following actions being taken against them: <ul style="list-style-type: none"> <li>a. written warning;</li> <li>b. suspension;</li> <li>c. termination;</li> <li>d. blacklist; or</li> <li>e. claim for damages.</li> </ul>

## 7.0 PERFORMANCE MEASURES AND NON-CONFORMANCE CRITERIA


Activity	KPI
n/a	

## 8.0 LIST OF RECORDS

Form Name	Form Number	Owner
n/a		

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## 9.0 APPENDIX

### 9.1 Sample scenarios for guidance (non-exhaustive)


Scenarios	Guidance
1. I received festive hampers for Christmas from my vendor	To raise Gift Declaration within three (3) working days from the receipt date. Integrity and Compliance Unit may recommend for the hampers to be shared with other colleagues, if appropriate.
2. I work very closely with Officer A in Ministry X for regulatory approvals. I wish to give Officer A one box of cookies for the upcoming festival as Officer A has been very helpful to me throughout the year	<p>a. To raise Gift Declaration within seven (7) working days before the intended date of sponsorship decision. Integrity and Compliance Unit shall assess the merit of the request and appropriateness of the gift vis-a-vis the recipient, among other considerations, on a case-to-case basis. The sponsorship should not proceed before Integrity and Compliance Unit's feedback / approval.</p> <p>b. For countries with explicit laws prohibiting any GECH in any form regardless of value to the public officials, the employee shall not give anything at all to any public official.</p>
3. I am given a sponsorship of accommodation, meals and transportation by my agent for a business trip to Country X for marketing exposition	To raise Gift Declaration within three (3) days from the date of this sponsorship is made known to the employee for Integrity and Compliance Unit's assessment and comment (if any) before the employee proceeds.

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Scenarios	Guidance
4. I am invited for dinner at a restaurant by my clients after our meeting	To raise Gift Declaration within three (3) working days from the dinner.
5. My supplier sent three boxes of chocolates together with e-wallet vouchers worth USD100.00 in conjunction with the upcoming Eid festive season	a. E-wallet vouchers must be returned immediately as cash equivalents are prohibited under paragraph 4.3 (d) of ABAC Policy. b. Chocolates: To raise Gift Declaration within three (3) working days from the receipt date for Integrity and Compliance Unit's assessment and comment (if any).
6. I attended an industry conference representing the company and was given a goodie bag containing stationeries, lanyard, and notebook. This goodie bag is given to all attendees	The employee may keep the goodie bag. No requirement to raise Gift Declaration, as this is treated as an exception under paragraph 4.4 of the ABAC Policy.
7. We are collaborating with another corporation on a donation drive project for a particular charity centre. We target to donate cash and sponsor specified items in need which are worth USD2,000.00 in total	a. To ensure sufficient background checks have been performed on the participating corporation and the charity centre, including the merit of the proposal and integrity of the recipient. b. To ensure approval has been obtained from Senior Management in accordance with the LOA. c. To raise Gift Declaration within seven (7) working days before the event.

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Scenarios	Guidance
<p>8. My wife works in another corporation that has won a bidding for a project that I'm primarily in charge of in our company. Her company invited me to join a privileged golf game in a private club.</p>	<p>a. The employee must immediately make a declaration on conflict of interest in the prescribed platform based on People Department's Conflict of Interest Policy.</p> <p>b. To raise Gift Declaration within three (3) working days from the receipt date of the invitation and to mention the conflict of interest in the form. Integrity and Compliance Unit shall ascertain whether such invitation should be accepted.</p>
<p>9. My supervisor received a Cartier watch worth USD5,000.00 for his birthday from the president of a multi-national company that provides services to us.</p>	<p>The supervisor must return the watch as it is the Group's policy stance that gift of such nature and high value is prohibited as per paragraph 4.6.</p>
<p>10. I won a lucky draw in our Allstars' annual dinner. My prize is iPhone 16 Pro Max.</p>	<p>Congratulations, you may keep the prize and are not required to raise a Gift Declaration for it, in line with the exception provided in paragraph 4.4.</p>

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