

CODE OF BUSINESS CONDUCT  
for  
MALAYSIA AVIATION GROUP

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ISSUE 01 REVISION 03

## **1.0 MESSAGE FROM GROUP MANAGING DIRECTOR**

Accountability and integrity are fundamental values in conducting business. These principles are key to the success of Malaysia Aviation Group, enabling it to soar with pride and excellence. By consistently upholding high ethical standards, MAG shall continue to drive improved performance and achieve sustained growth.

This Code of Business Conduct acts as a framework for MAG to adopt and integrate into its business practices. The aim is for MAG to fully embrace the values outlined in this Code, ensuring that Malaysian Hospitality is extended not just to customers, but also to MAG's stakeholders. Rather than restricting behavior, this Code is intended to nurture strong corporate values within MAG's daily operations.

As MAG strives to fulfill its commitment to stakeholders, it is essential to deliver exceptional service through best practices and core values that cultivate trust and strengthen healthy business relationships with every stakeholder.

## **2.0 INTRODUCTION**

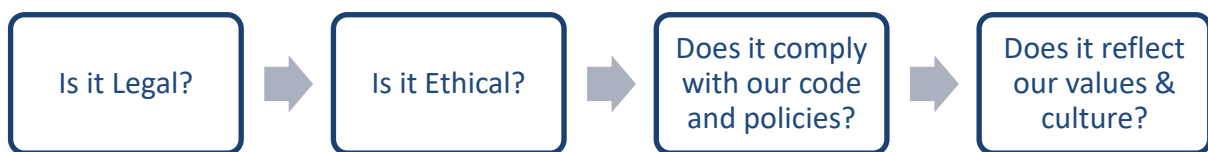
MAG is dedicated to conducting its business with fairness, impartiality, and full compliance with all applicable laws and regulations, both within Malaysia and internationally. Your professionalism, honesty, and integrity must always be upheld in your dealings with customers, vendors, suppliers, contractors, governments, regulators, investors, the broader business community, and fellow employees.

You are expected to understand and adhere to the Code of Business Conduct. As you review this Code, you shall familiarise yourself with the standards designed to protect you and guide you in applying them to your daily work. The Code outlines ethical business practices that

create a safe, respectful, transparent, and comfortable workplace, where integrity and doing the right thing are prioritised.

The Code should be read in conjunction with the Corporate Approving Authority Policy (“CAAP”), the Anti-Bribery & Corruption (“ABC”) Policy, and other company directives and guidelines, which provide further details, clarifications, and updates to the Code as issued by MAG. You are encouraged to seek clarification on the Code of Business Conduct from your Head of Department or Group Business Integrity, ask any questions, and report any suspected violations of the Code.

As a general guideline in a decision-making process or cause of action, ask yourself the following questions:



If you can confidently answer "yes" to all the above questions, you may proceed with assurance. However, if any answer is "no," do not move forward, as the action could lead to serious consequences. If you're uncertain, seek guidance from your Head of Department or the Head of Group Business Integrity.

Heads of Departments are responsible for fostering a culture of ethics and compliance and must be available to address any questions or concerns from employee(s).

## DEFINITIONS

References to “you” or “your” in this Code of Business Conduct refers to any person to whom the Code applies. Where more specific references are used (such as “employee(s)”), the more specific reference is intended.

For purposes of this Code, the term “family/household” shall include your spouse(s), daughters, sons, children (including step-children and adopted children), parents, step-parents, siblings, step-siblings, grandmother, grandfather, grandchildren, in-laws, son-in laws, daughter in laws, uncles, aunts, nieces, nephews, and first cousins, as well as other members of your family/household.

The term “employee(s)” in this Code means any person who is in the employment of MAG including but not limited to every director (executive and non-executive), secretaries, secondees and individuals on permanent term or contractual term.

The term “MAG” means Malaysia Aviation Group and its subsidiaries and controlled companies. The expression “MAG” is used for convenience where references are made to MAG companies in general. The companies in which MAG has direct or indirect shareholding are distinct legal entities.

### 3.0 MAG CULTURE PRINCIPLES

#### **INSPIRE TRUST**

We respect each other's perspectives and experience to ensure we are reliable and dependable.

#### **DREAM BIG**

We challenge ourselves to create possibilities for the future and have the ambition to make it happen

#### **MAKE MALAYSIA PROUD**

We show our Malaysian Hospitality in everything we do and represent the nation to the world.

### 4.0 RAISING CONCERNS & WHISTLEBLOWING POLICY

4.1 MAG is deeply concerned about the detrimental effects that breaches of its business philosophy and principles can have on the company's ability to achieve its vision, mission, and objectives, as well as the potential harm to MAG's reputation and brand. This section of the Code provides guidelines on how to be responsible and in good faith raise genuine concerns, with the aim of strengthening MAG's value and integrity.

4.2 If you report or disclose any potential non-compliance with this Code in good faith and without malicious intent, believe that a breach or violation has occurred or may occur, you shall be afforded confidentiality protection, to the extent reasonably practicable. Additionally, employees who report concerns internally shall be protected from any retaliatory actions for making such disclosures, to an extent reasonably practicable. For further details on how MAG manages its whistleblowing process, please refer to MAG Whistleblowing Policy.

4.3 To raise a concern, you can call the Hotline at 1-800-81-7270 or use the whistleblowing online portal at (<http://www.malaysiaairlines.ethicspoint.com>). Both the hotline and the online platform are managed by an independent service provider that ensures the confidentiality of the information provided. These whistleblowing channels are available 24/7. Reports can be submitted in multiple languages, including Malay, English, Mandarin, and Tamil, via the hotline. You may choose to provide your name or remain anonymous.

Please note that if you raise concerns through other means, such as email and copying others, Group Business Integrity may not be able to protect your identity, as it may be considered that you've shared your concern with others.

#### 4.4 REPORTING OF SUSPECTED NON-COMPLIANCE AND/ OR BREACH OF THIS CODE

You are required to report any criminal or illegal activity conducted or involving another employee(s) which comes to your knowledge. Failure to report the knowledge of such wrongdoing may be interpreted as condoning the crime and/or an accomplice and may result to consequence management. A variety of channels are available to facilitate the making of reports such as the MAG Whistleblowing Policy, the Industrial Relations unit under Group Human Capital, or your Head of Department.

#### 4.5 INVESTIGATIONS

During any investigation, you shall fully cooperate and answer all questions honestly. Consequence management linked to the outcome of investigation(s) shall be governed and managed by the Industrial Relations unit under Group Human Capital. Action taken may

include prosecution, termination of employment, suspension, demotion, or loss of benefits and shall depend on the circumstances of each case.

#### 4.6 RETALIATION

Under the MAG Whistleblowing Policy, MAG does not tolerate retaliation against employee(s) for raising concerns in good faith. MAG values your help when you raise concern(s) about potential misconduct or other wrongdoing and MAG is committed to protecting you from harassment, dismissal, or any mistreatment that may result. Any attempt to retaliate, victimise or intimidate the whistleblower from making a report in good faith is a serious violation of the Code of Business Conduct and shall be dealt with thoroughly and severely. However, false and malicious allegation(s) which waste valuable MAG resources shall not be tolerated.

If you work with someone who you know has reported a concern or assisted by providing information in an investigation, you shall not discuss the matter with the employee(s) concerned, or with other colleague(s). You shall continue to treat that person as you would when interacting with them under normal circumstances.

### 5.0 CONFLICT OF INTEREST (COI)

#### 5.1 GENERAL GUIDANCE

A Conflict of Interest (COI) arises when your personal interests or those of a third-party clash with the interests of MAG. You are responsible for always avoiding any COI situations. A COI can impair your ability to carry out your duties impartially and objectively, and it may influence, or being perceived to influence, your decision-making, which could harm your reputation within MAG. If you find yourself in an actual or potential COI situation, you are required to disclose it to your Head of Department. Failure to disclose the nature and extent of the COI may lead to disciplinary action.

## 5.2 FAMILY MEMBERS

You are required to disclose any family members working within MAG. All employment process shall be done in accordance with MAG's recruitment policies and procedures. You shall not exert influence over hiring decisions, supervise, affect terms and conditions of employment or influence the company regarding the engagement of any family member by MAG. Family members of an employee shall only be hired as employee(s) or external consultant(s) only if the appointment is based on qualifications, performance, skills and experience, and in accordance with MAG's recruitment policies and procedures.

You are required to disclose any family interest(s) (whether in the form of directorships, partnerships, shareholdings or key decision-making position) in entities which have any form of dealing(s) (whether directly or indirectly) with MAG in the course of your duties and thereafter abstain from any involvement in the said business dealing.

Further, MAG shall ensure that the business dealing(s) are conducted at arm's length, in compliance with the relevant policies and procedures within the company.

## 5.3 DEALINGS WITH SUPPLIERS, CUSTOMERS, AGENTS AND COMPETITORS

You shall not hold any financial interest (other than shares available on Bursa Malaysia) in supplier(s), customer(s), agent(s) and/or competitor(s) on MAG's list of registered contractors, its related companies or supplier(s) that have contractual or supply arrangements with MAG.

## 5.4 PERSONAL BUSINESS DEALINGS WITH SUPPLIERS AND CUSTOMERS

You shall not, directly or indirectly, enter into dealings for the supply or purchase of any personal property, goods or services from any of MAG's customer(s), supplier(s) or contractor(s) with whom you have or are likely to have official dealings on behalf of MAG, other than transaction(s) or dealing(s) on such terms as are freely available to the general public.

## 5.5 EXCLUSIVE SERVICE AND ACTIVITY OUTSIDE MAG

You shall not hold any other full-time employment outside MAG. You are required to obtain approval from the Head of Department to do a part-time job. You are required to ensure any part time work does not impede the quality of work you provide to MAG. Any employee(s) appointed to the Board of their family-owned business is required to declare and obtain the written approval from their Head of Department and Head of Group Business Integrity.

## 5.6 DECLARATION INVOLVING CONFLICT OF INTEREST

On an annual basis, you are required to submit the Annual Declaration Form regarding Conflict of Interest matters under this Code through the Business Integrity declaration portal. If you have no conflicts to declare, you must still submit the form, confirming a “NIL” Conflict of Interest. The completed form shall be reviewed and approved by your Head of Department and the Head of Group Business Integrity. All submitted forms shall be processed and stored by Group Business Integrity in accordance with applicable data protection regulations.

Under all circumstances, you shall promptly disclose any potential or actual conflict of interest, whether direct or indirect, including those involving your family member(s), to your Head of Department as soon as it arises within your duties. You shall refrain from participating in, discussing, or being involved in the decision-making process of any matters that present a conflict of interest or perceived as a conflict of interest.

## 6.0 BUSINESS INTEGRITY AND UNETHICAL PRACTICES

### 6.1 BRIBERY AND CORRUPTION

MAG has zero tolerance against bribery and corruption. You are strictly prohibited from, whether directly or indirectly, offering, giving, soliciting or accepting any bribes from any party for yourself or for any other party (including your family member(s)) to achieve business or personal advantage, or engage in any transaction that can be construed as having contravened



the anti-corruption laws. You shall be subjected to disciplinary action, which includes dismissal, if you are convicted by the courts under anti-corruption laws.

Bribes are described in the forms below (but are not limited to):

- Money, gifts, loans, fees, rewards, valuable security, property or interests in property being property of any description whether movable or immovable, financial benefit or any other benefit similar in advantage;
- Any office, employment, contract of employment or services, and agreement to give employment or rendering of services in any capacity;
- Any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- Any valuable consideration of any kind, any discount, commission, rebate, bonus or deduction;
- Any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
- Any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding points mentioned above.

If you are offered a bribe, you are required to report it as soon as possible to your Head of Department or lodge a complaint through the MAG Whistleblowing Policy. For further details, please refer to the ABC Policy.

## 6.2 FACILITATION PAYMENT

You are prohibited to make payments to induce public officials to perform routine functions that they are otherwise obliged to perform since these can sometimes be construed as bribes. If you are approached for an unofficial facilitation payment, you shall decline the request. Where failure to make such payments is likely to disrupt normal operations or prevent them from running smoothly, you shall seek advice from your Head of Department and Head of Group Business Integrity for further assessment and deliberation.

### 6.3 COMMISSIONS, DISCOUNTS AND SECRET PROFITS

You shall not accept or obtain, directly or indirectly, any discount, rebate, commission, service, interest, consideration of value or other benefits or payments of any kind (whether in cash or in kind) in respect of any goods or services sold or purchased relating to the business of MAG.

### 6.4 GIFTS

MAG implements the Gifts Management Policy stipulated in the ABC Policy. Giving and receiving gifts shall only be allowed under narrow exceptions following the strict adherence of the ABC Policy pertaining to the giving and receipt of gifts. Employees and third parties shall adhere to MAG ABC Policy on gifts, hospitality, and entertainment. All such transactions shall be made transparent, modest, and proportionate, and shall not be intended to influence business decision(s).

Under the exceptions where the gift(s) are received or given out, the employee shall make a declaration of the gift(s) received to the Head of Department and in the Business Integrity declaration portal. It is a requirement to note that any gift(s) received or rejected be declared in the Business Integrity declaration platform. As and when applicable, stricter rules may apply.

### 6.5 ENTERTAINMENT AND CORPORATE HOSPITALITY

MAG allows conducting and participating in entertainment and corporate hospitality activities subject to strict adherence to ABC Policy.

You may conduct or participate in normal business hospitality such as lunches, dinners, entertainment and other hospitality events provided that the purpose of such hospitality is for bona fide MAG business. You shall not put yourself in a situation where a COI may arise. You shall ensure to safeguard the image and reputation of MAG and yourself when participating in the hospitality event.

Employee(s) are required to disclose any invitation(s) offered or received to their Head of Department and record all entertainment and corporate hospitality activities conducted or

attended in the Business Integrity declaration portal. As and when applicable, stricter rules may apply.

#### 6.6 DONATIONS AND SPONSORSHIPS

MAG provides assistance in appropriate circumstances and in an appropriate manner. You may be allowed to make donation(s) on behalf of MAG provided that you have obtained prior written approval from the GMD and in accordance with CAAP.

Whenever the situation arises or is required, you may seek sponsorship(s). However, there are a few conditions which you are required to comply with before you make a sponsorship request. You shall consult with your Head of Department and any sponsorship or donations made or received must be approved by the GMD and in accordance with ABC Policy, CAAP, and CSR Guidelines.

Any red flag(s) shall be resolved before committing any fund(s) to the donation or sponsorship. Even request(s) determined to be legitimate shall be carefully structured to ensure that the benefits reach their intended recipients. If you are in any doubt that the contribution or social benefit is inappropriate, consult your Head of Department or Group Business Integrity for assistance.

#### 6.7 POLITICAL ACTIVITIES AND CONTRIBUTION

You have the right to participate as an individual in the country's political process if it is kept distinct and separate from your role and responsibility as MAG employee(s). You shall ensure that your performance is not adversely affected by your involvement in politics.

Employee(s) who are involved in politics shall not use their position to persuade or use other forms of oppression on other employee(s) to make contributions for political causes, support them or other political candidates. You are prohibited to utilize MAG's resources to fund political campaigns, political parties, political candidates or anyone associated with them.

For clarity, government officials shall include, without limitation, candidate(s) for public office, officials of any political party, and officials of state-owned enterprises other than the MAG.

#### 6.8 DEALING WITH PUBLIC OFFICIALS

The offering of gifts and hospitality, including travel-related expenses for government officials, are subjected to ABC Policy, CAAP and the local laws of the country in which the government official is a resident of. If you are in doubt or have difficulty dealing with Government officials, you are required to escalate the matter to the Government Relations team and GMD.

#### 6.9 FRAUD AND THEFT

Fraud is a deception deliberately practiced to secure unfair or unlawful gain. You shall not engage in any form of conduct involving deceit and/or fraud which would directly or indirectly, affect the interest of MAG. If you are found to be guilty of fraudulent activity, you shall be subjected to consequence management which includes termination. If fraud has resulted in a loss to MAG, it shall be recovered through a civil suit, irrespective of any criminal charges by the authorities.

#### 6.10 ANTI-MONEY LAUNDERING AND EMBEZZLEMENT

Money laundering is the process of concealing or disguising illegally obtained funds and passing it through legitimate sources of income or assets by various means from one place (or person) to another. You are prohibited from being involved in money laundering activities, either directly or indirectly. At times, during the process of money laundering, embezzlement might involve either an individual or group of people manipulating the financial report to deceive MAG from the actual value of money made by MAG for own or third party's benefit. If you are suspicious of any transaction or have any concerns, you are required to report such suspicion or concern to the Group Chief Finance Officer and the Head of Group Business Integrity without any delay.

## 7.0 NATIONAL & INTERNATIONAL TRADE, ANTI-COMPETITION, AND SANCTIONS

### 7.1 ANTI-TRUST/COMPETITION LAW

Anti-trust/competition laws protect free enterprise and prohibit behaviour that limits trade or restricts fair competition. You shall not disclose any commercially sensitive information on pricing, products, customers or markets to the customers, suppliers and competitors. Any breach of the anti-competition law(s) shall result to consequence management which includes dismissal. Be reminded that the infringement of laws and regulations governing free and fair competition can further result in civil or criminal liability on you personally and/or MAG.

### 7.2 FAIR TRADING

Employee(s) shall attempt to deal fairly with customers, suppliers and competitors at all times. Employee(s) shall ensure that MAG does not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair or unethical business practice.

Employee(s) shall ensure that all procurement and business dealing(s) always adhere to fair and proper business practices and comply with the laws and regulations governing free and fair trade and competition. This shall include strict compliance with the Group Procurement Policy.

### 7.3 EXPORT OR IMPORT CONTROLS AND SANCTIONS

Export or import controls and sanctions give countries legal control over the transfer of goods, technology, software or services across national borders by whatever means. You shall ensure that MAG has proper authorisation from the relevant authorities before exporting or importing goods, technology, software or services. MAG business or operations may also be subject to sanctions, particularly those made or stated in the United Nations Security Council, the US OFAC List, the EU Sanctions List and/or by the national legislation. MAG and its employee(s), vendor(s) or agent(s) shall comply with all applicable sanctions laws, rules, and regulations relating to customs and trade controls and sanctions where relevant, and any other related laws in the countries in which MAG operates.

## 8.0 SAFEGUARDING, IMAGE, INFORMATION, REPUTATION AND ASSETS

### 8.1 IMAGE AND REPUTATION

You are required to act in accordance with the MAG Culture Principles to safeguard the image and reputation of MAG. These involve safeguarding information and activities within MAG. You shall not spread rumors or provide false information to anyone, including family member(s).

### 8.2 PROTECTING ASSETS

The assets can be financial, tangible (aircraft, spare parts, buildings, equipment or funds), or intangible (computer software or intellectual property). The assets shall be protected against waste, loss, damage, misuse, theft, misappropriation or infringement. You are required to protect the assets and may be liable for any loss of or damage to them because of willful misconduct, negligence, careless action or not following instructions or operating procedures. The assets shall not be used for solicitation or distribution activities that are not related to your job scope, except for charitable activities that have been properly pre-approved by the relevant appropriate approving authorities as per CAAP.

### 8.3 PROFESSIONAL USE OF COMPUTER, E-MAIL SYSTEM AND PHONE

All computer facilities shall be safeguarded against theft, damage and improper usage. The computer facilities include access to the Internet, e-mail services and all other computer hardware, software and peripherals. You shall be courteous to other users of the computer system and always conduct yourself in a professional manner. You are also prohibited from using these facilities for personal gain or advantage. You are prohibited from using the computer, email, telephone system or mobile phone (if applicable) to send or receive and / or solicit messages or files pertaining to matters or containing items that are illegal, sexually explicit, abusive, political, subversive, controversial, offensive or profane.

You are prohibited from using the computer system to send (upload) or receive (download) copyrighted materials, proprietary financial information or similar materials without relevant prior approval or authorization. Further details, please refer to the Group IT Security Policy.

#### 8.4 SOCIAL MEDIA

Employees are permitted to use blogs and social networking sites, both during and outside of work hours. However, you are required to be mindful that information shared on these platforms is public and can be viewed by other employees, customers, or members of the media. You shall act in the best interests of MAG, ensuring that you do not violate confidentiality or undermine the trust and confidence placed in you. This includes refraining from posting inappropriate content or comments that could negatively impact MAG's image and reputation. You are responsible for carefully considering what you post.

Under no circumstances, whether during working or non-working hours, should you associate MAG with your personal political views on your personal social media accounts.

Additionally, no posts are allowed to be made on social media during working hours unless they are for work-related purposes. For further details, please refer to the Social Media Guidelines issued by Group Branding.

#### 8.5 INTELLECTUAL PROPERTY

Intellectual Property covers all ideas, inventions or copyright produced by you as a result of the work performed for or on behalf of MAG in the course of your employment. MAG is legally entitled to all rights in ideas, inventions and works of authorship relating to its business that are made by you in the course of your employment by virtue of your employment with MAG. MAG's ownership of such intellectual property shall continue even after you have ceased employment with MAG. You can seek advice from your Head of Department when in doubt of your obligation and responsibility in protecting MAG's intellectual property.

## 8.6 RECORDS MANAGEMENT

Documents and records are meant for business purposes and requirements, compliant with legal, tax, accounting, audit reports and regulatory laws. All files, records and reports acquired or created in the course of employment are the property of MAG. You shall control and maintain such records so that they are accurate, up-to-date, legible, readily identifiable and retrievable. All records shall be handled according to the appropriate levels of confidentiality, in accordance with any applicable policies and procedures and in conformity with all applicable laws and regulations. Should any release of such information become necessary, the relevant authorised personnel as per CAAP shall be consulted, and their prior approval obtained. The documents or information released are required to be kept in a secure environment and shall be returned to MAG at any time upon request.

## 8.7 DATA PROTECTION

You shall not disclose or use any information obtained from MAG's records, computer files, or programs—whether directly or indirectly—for personal gain or any purpose other than what is intended by MAG. If the release of such information becomes necessary, you are required to consult the relevant authorised approving party as per CAAP to obtain their prior written approval. For further details, please refer to the MAG Personal Data Protection Policy and Group IT Security Policy.

## 8.8 CONFIDENTIAL INFORMATION

You are responsible for safeguarding MAG's confidential information and must not disclose or use it for personal gain. Proprietary data, including pricing, product development, trade secrets, and non-public details, shall be kept strictly confidential. You are required to use such information only for your job duties and handle it with care to prevent accidental disclosure.

Examples of confidential proprietary information shall include, but are not limited to:

- Business plans
- Information about novel technology
- Strategic plans
- Legal proceedings



- Training material, including manuals
- Software programs

Depending on the type of information, unauthorized divulgence or mishandling can have serious repercussions to MAG. For example, MAG could be placed at a competitive disadvantage; it might be exposed to legal proceedings, or its image could be negatively affected.

## **9.0 PUBLIC STATEMENT**

9.1 Only authorised employees are permitted to make public statements or comments on behalf of MAG. Failure to comply with this policy may result in disciplinary action. You may participate as a presenter or panelist at seminar(s) or conference(s) in your capacity as an expert in a specific field. However, you are required to obtain prior written approval for such participation from your Head of Department, Group Communications, and Group Branding, particularly if you plan to represent MAG or associate the MAG brand with the event. Approval shall also include for the final presentation material(s) before they are distributed or presented at any seminar or conference. Additionally, you shall refrain from sharing any confidential, commercially sensitive, or operationally sensitive information related to MAG.

## **10.0 WORKPLACE CULTURE AND ENVIRONMENT**

### **10.1 SAFE, SECURE AND CONDUCIVE WORKPLACE**

You shall conscientiously and diligently comply with all health, safety and environment requirements, measures, work rules and standard operating procedures set out in manuals, handbooks and documents issued by MAG as amended and updated from time-to-time and all applicable laws and regulations. You are also required to immediately report accidents, injuries, unsafe equipment, practices or conditions at the workplace to the available reporting platform

provided by Group Safety and Security. In case you have doubt, please seek clarification from your Head of Department.

## 10.2 HARASSMENT

Abusive, harassing, bullying or offensive conduct used or displayed during any business dealings is unacceptable, whether verbal, physical or visual. Examples include but not limited to:

- derogatory comments based on gender, religion, race, ethnic characteristics, lifestyle, or family
- unwelcome sexual advances
- spreading misinformation or malicious rumors
- behaviour or language that frightens, humiliates, belittles or degrades, including criticism that is delivered with shouting or screaming
- displaying offensive material

MAG has zero tolerance against sexual harassment. Inappropriate behaviour at the following event(s) can be considered as potential employment-related sexual harassment:

- At work related social functions;
- In the course of work assignments outside the work premise;
- At work related conferences or training sessions;
- During work related travel;
- Over the phone;
- Through electronic and/or social media

You are required to report case(s) of harassment without undue delay to your Head of Department or Group Business Integrity via the MAG Whistleblowing Policy.

## 10.3 DISCRIMINATION

MAG does not tolerate any form of discrimination, i.e. gender, race, religion, background or any other aspect that could be used to discriminate in the workplace or on the job. Employee(s)

shall comply with the laws in their respective local jurisdiction that prohibit workplace discrimination.

#### 10.4 ALCOHOL AND DRUG ABUSE

The following activities are prohibited on or within MAG premises or property:

- The manufacture, possession, distribution, dispensation, sale or use of illicit drugs, unprescribed drugs and / or other controlled substances by you.
- Consumption of alcohol, except when on duty travel (if flight onboard offer such beverage) or during approved hospitality event(s).

#### 10.5 BORROWING MONEY

You shall not borrow money from your subordinate(s) or supervisor(s). You are also prohibited, under any circumstances, from borrowing money from any organisation that MAG conducts business with or competes with, unless the organisation is a legal financial institution, and the loans are offered to the public.

#### 10.6 POST-EMPLOYMENT: COOLING OFF PERIOD

Employees who have resigned and subsequently employed by MAG's suppliers or agents are barred from providing any services to the Group for a period of one year (cooling off period).

### 11.0 ADHERENCE TO THE CODE, RULES AND REGULATIONS

#### 11.1 COMPLIANCE WITH RELEVANT LAWS AND REGULATIONS

MAG and its employee(s) are bound by the law. Compliance with all applicable laws and regulations shall never be compromised and this includes any laws inside or outside of Malaysia.

## 11.2 FAILURE TO COMPLY WITH THE CODE

Any violation of the Code, or the directives, rules, and guidelines outlined in MAG's policies, procedural statements, or other documents, shall result in consequence management, which may include termination of employment, if substantiated.