

MALAYSIA AVIATION GROUP

WHISTLEBLOWING POLICY

ISSUE 01 REVISION 01

1.0 INTRODUCTION

The Board of Directors and Senior Management of Malaysia Aviation Group (“MAG”), believes that everyone associated with MAG has an important role in contributing and supporting MAG to achieve its corporate vision and mission. MAG is committed to maintaining the highest standards of integrity and transparency.

MAG is concerned about breaches that may occur within MAG that may prevent MAG from achieving the overall corporate vision, mission and objectives.

The MAG Whistleblowing Policy shall be applicable to all employees and includes the Board of Directors, (hereinafter, **MAG Personnel**), and MAG stakeholders. All employees, contractors, and third parties to report any concerns about bribery or corruption or any other misconduct in accordance with this Whistleblowing Policy.

The Whistleblowing Policy shall also cover agents, agency staff, consultants, vendors, independent contractors, suppliers of goods, services and any other people associated with MAG, wherever located.

The main objective of this Policy is to provide a mechanism for anyone to raise their genuine concerns responsibly and in good faith, especially when it concerns:

- Fraud or corruption, unauthorised use of MAG’s funds, assets, criminal, fraudulent negligence, harassment, discrimination, risk to safety and security, abuse of position for any unauthorised use or for personal gain etc.
- Employee(s) not adhering to policies, procedures, regulations, and failing to meet the appropriate professional standards.

MAG is committed to making whistleblowing an acceptable practice for employees to raise genuine concerns or make suggestions about these issues in good faith. MAG is committed to

this initiative. To demonstrate such commitment, this Whistleblowing Policy comes under the purview of the Board Audit Committee (BAC). Group Business Integrity as the custodian of the whistleblowing platform shall report to the Board Audit Committee directly.

This Whistleblowing Policy has been introduced to provide a safe and acceptable way for anyone to raise concerns about malpractice affecting MAG without fear or favour. This Whistleblowing Policy shall allow anyone to raise issues in an independent and unbiased manner. Group Business Integrity shall ensure that all reports are treated seriously and investigated thoroughly.

2.0 MAG ASSURANCE

Anyone raising issues via the Whistleblowing platform shall not be victimised when they raise their concerns under this Whistleblowing Policy. However, the reporter shall act responsibly and in good faith in their reporting.

Any attempts to retaliate, victimise or intimidate the whistle blower from making a report in good faith is a serious violation of the Code of Business Conduct and shall be dealt with severely.

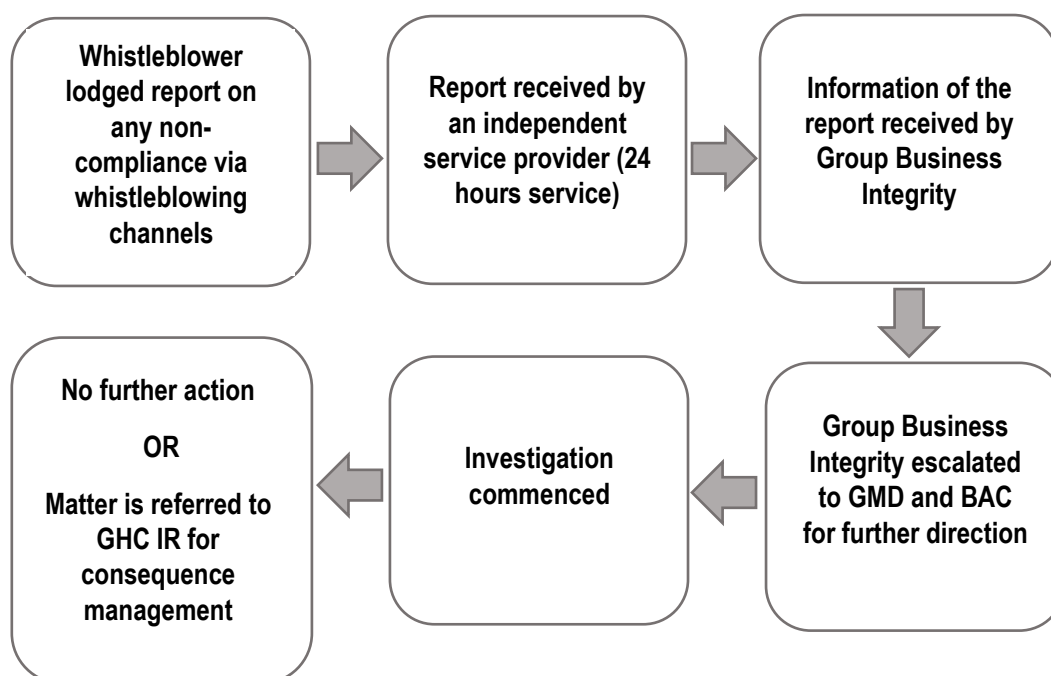
Your concerns and identity are part of the confidentiality and Group Business Integrity shall ensure that your identity is not revealed. All reports made under this Whistleblowing Policy shall be treated with utmost confidentiality. The identity of the whistleblower shall be fully protected, subject to legal requirements and the need to conduct a thorough investigation.

3.0 HOW TO RAISE A CONCERN

To raise a concern, please call Hotline **1-800-81-7270** or alternatively, you may access the whistleblowing online portal at **www.malaysiaairlines.ethicspoint.com**. The hotline and the online platform are managed by an independent service provider who shall maintain the confidentiality of the information provided. The whistleblowing channels are available 24 hours every day. You can submit the report in multiple languages such as Malay, English, Mandarin and Tamil via the hotline number.

You may choose to give your name or remain anonymous. Group Business Integrity wishes to highlight that if you raise your concerns through other means/channels, i.e. emails, and copying others into the mail, Group Business Integrity may not be able to protect your identity as you will be deemed to have shared your concern/grievance with others.

Below is the chart to show the whistleblowing process:



If such report involves an employee of a Business Unit, the Business Unit shall not be involved in the investigation of the case to avoid any circumstances that may give rise to a conflict of interest.

In such a case, the GMD and/or Group Chairman shall select other employee(s) or Business Unit or appoint an independent committee to investigate the allegations.

If there is an allegation raised against the GMD, it shall be directly raised to the BAC Chairman or to the Group Chairman for an independent investigation to be undertaken.

If there are evidence to indicate that Group Business Integrity is not upholding its confidentiality, this shall be reported directly to the GMD or BAC Chairman (which ever source of information, including verbal conversation and employee(s) not involve in the case). In such circumstances, an investigation shall be conducted by an independent committee as assigned by GMD or BAC Chairman on Group Business Integrity.

- Source: Group Managing Director, Malaysia Aviation Group.

In the event you need to lodge a report against the Group Managing Director, you may direct the report to the Group Chairman directly. Whereas in case you need to lodge a report against any personnel of Group Business Integrity, as the custodian of the whistleblowing platforms, you may raise your concerns to the BAC Chairman.

4.0 HOW YOUR CONCERN SHALL BE ADDRESSED AND RESPONDED

Once you have lodged your concern via the whistleblowing platforms, the following steps shall be taken:

- You are given a unique identifier by the whistleblowing system to access your report.

- This identifier shall be the communication tool for the investigator to communicate with you for further information & clarification, providing updates and action being taken.
- An initial assessment of the matter shall be made to decide on the appropriate action to be taken.
- In certain circumstances, you may be required to provide additional information/clarification, depending on the complexity of the case.

If you have a personal interest in the matter, you shall be required to disclose this at the beginning and where your concern falls more appropriately within the GHC Policy and Procedure (Individual Grievance), you shall be advised accordingly.

You shall be provided with feedback on actions taken if you have requested it. However, kindly be advised that Group Business Integrity may not be able to make a full disclosure of the result as it will infringe our fiduciary duties of confidentiality. You shall be required to treat any information provided to you as confidential.