
Policy

Code of Conduct and Ethics

Department

People and Culture

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Code of Conduct and Ethics
Issue 04 Revision 00
22 March 2022
Approval For
All companies within Capital A Berhad

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Code of Conduct and Ethics

Issue 04 Revision 00

22 March 2022

Approval For

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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	GOQA/PCR/057	24 May 18	21 Jun 10	Initial Issue as a group document. This SOP overrides the Code of Conduct SOP (Doc. No.: AA/PD/SOP/02)
02	00	OQA/PCR/20/106	29 Jul 20	14 Aug 20	New issue.
02	01	OQA/PCR/21/039	05 Jan 21	26 Feb 21	Revision.
03	00	OQA/PCR/21/054	12 Mar 21	30 Mar 21	New issue.
04	00	OQA/PCR/22/043	22 Mar 22	12 May 22	Company name change from AirAsia Group Berhad to Capital A Berhad.

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REVISION HIGHLIGHTS


All changes recorded in this Revision Highlight will be for the latest revision only.

Type of Change: Addition Revision Deletion

Page No.	Item No.	Type of Change	Description of Changes
All	-	△	Changed to Capital A's logo and Capital A Berhad's term.
All	-	⊗	Removed all AAGB's term.
-	Cover Page	△	Revised according to the latest issue.
-	Copyright 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	○	Added all changes for Issue 04 Revision 00.
4	Distribution Control List	△	Revised according to the latest issue.
8	Abbreviations	○	Added and revised according to the latest issue.
14	4.0	△	Updated the titles and Document No. accordingly.
16	5.3	△	Inserted the revised Allstars's Values.
19	7.7.2	△	Revised to Allstars are expected to read all Company related news, information and announcements made by the Company via email or on any recognized official platforms.

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Page No.	Item No.	Type of Change	Description of Changes
20	7.9.2	△	Revised the policy title to Anti-Harassment Policy.
23	7.16.2	⊗	Remove term 'Internal Audit'.
27	10.2.7	△	Revised to term 'Allstars'.
38	13.2	⊗	Remove item c. reduction of salary.
39	14.5	△	Revised to the title, Head of Legal.

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DISTRIBUTION CONTROL LIST

The Control No. in the Distribution Control List are defined with the following codes:

A = Aircraft, S = Station, P = Personnel, G = External Ground Handler, X = Other External

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Company Secretary	KUL	RedDocs	Softcopy
Allstars	Capital A Berhad companies	RedDocs	Softcopy
Public	Investor Relations Webpage	RedDocs	Softcopy

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ABBREVIATIONS

Abbreviation	Full Term
AASEA	AirAsia South East Asia
ADE	Asia Digital Engineering
AIDS	Acquired Immunodeficiency Syndrome
CA	Competition Act
CEO	Chief Executive Officer
ER	Employee Relations
KLIA	Kuala Lumpur International Airport
KUL	IATA Code for Kuala Lumpur
MASB	Malaysian Accounting Standards Board
OQA	Operational Quality Assurance
PAC	People and Culture
PCR	Process Change Request
PDPA	Personal Data Protection Act
SMS	Safety Management System
SMS	Short Message Service
SOP	Standard Operating Procedures

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DEFINITION OF TERMS


Term	Definition
Capital A Berhad / Company	All companies within Capital A Berhad.
Allstars	All employees of Capital A Berhad, including the Management Team and Directors.
Code	Code of Conduct and Ethics.
Conflict of Interest	Situation(s) in which an Allstar's personal interest conflicts with the professional interests owed to the Company.
Criminal Breach of Trust	When an Allstar who is given responsibility over a company property: <ol style="list-style-type: none"> a. steals it or puts it to wrong use, or b. converts that property to own use, or c. sells, throws or gives away the property without authorisation is in violation of any law that states the manner in which the trust is to be carried out or applied, or of any clause in a legal contract which provides how this trust is to be carried out, and that said violation resulted in suffering or loss to another person / party.
Gifts, Entertainment and Corporate Hospitality	As per defined in the AirAsia Group Anti-Bribery and Anti-Corruption Policy.
Grievance	A grievance is any type of problem, concern or complaint related to an Allstar's work or the work environment. A personal

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Term	Definition
	grievance can be about any act, behavior, omission, situation or decision impacting an Allstar but which Allstar thinks is unfair and unjustified.
Insider	Any person who possesses Price Sensitive Information and knows or ought to reasonably know that the information is not generally available to the public.
Intellectual Property	All works created while employed by the company, which are considered to be owned or for the exclusive use of the company, protected under the intellectual property rights (i.e. trademarks or service marks, patents and copyright).
Money Laundering	Money laundering is the process of making dirty money, gained through unlawful activities such as drug trafficking or terrorist funding, appear to be clean / good money coming from a lawful source. Money laundering is a crime.
Objectionable Material	Materials from the internet that are or could be perceived as offensive from religious, political, racial or gender perspectives. These include materials that have the potential to stir or cause hatred or ill feelings of various parties.
Price Sensitive Information	Information that, if made generally available, would or would not tend to have a material effect on the price or value of Company stock / securities.
Serious Acts of Misconduct	Actions that deceive the Company for personal gain, bring disrepute to the Company or blatantly disregard important Company policies, as well as rules and regulations.


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Term	Definition
<p>Taboo (Inappropriate) Words</p>	<p>Words that are strictly prohibited either verbally or in writing to any other Allstar, guests, business partners and visitors.</p>

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 The logo for Capital A Berhad, featuring the word "capital" in a bold, black, sans-serif font, followed by a stylized red outline of the letter "A".	<p>Code of Conduct and Ethics Definition of Terms</p>	<p>Doc. No. AA/PPL/S/004 Date 22 Mar 22 Issue 04 Rev 00 Page 12</p>
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1.0 OBJECTIVES

- 1.1 This Code of Conduct and Ethics (“Code”) provides guidance on how to conduct business and duties in Capital A Berhad in a manner that is efficient, effective and fair. It highlights the relevant policies, procedures and resources so Allstars can live up to the business standards set by Capital A Berhad (“Company”).
- 1.2 This Code replaces any existing Code of Conduct within Capital A Berhad. Allstars should seek advice from People and Culture should any doubt on the appropriateness of business practices arise.

2.0 SCOPE

- 2.1 The Code is applicable to all Allstars within Capital A Berhad, including the management team and directors. It may be reviewed, changed and updated from time to time.
- 2.2 The latest version of the Code shall be made available in RedDocs and the official Capital A Berhad website.


3.0 RESPONSIBILITIES

3.1 Allstars

- a. understand and comply with the principles set forth in this Code;
- b. portray and exercise good ethical values;
- c. ensure that their subordinates understand and comply with the Code; and
- d. be accountable for the behaviors of any subordinates who fail to comply with the Code and other applicable policies, procedures, guidelines, directives, rules and practices.

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3.2 Internal Audit

- a. Internal Audit may carry out periodic and independent audits on any of the processes in the Code as and when required e.g. declaration of conflict of interest (if any).

3.3 Business Partners


- a. Business Partners are expected to understand and comply with the relevant aspects of the Code. Violation of the Code may result in blacklisting or termination of their contract by the Company.

4.0 REFERENCE DOCUMENTS

Title	Document ID
Employee Handbook	MAA/PD/H/01
Anti-Harassment Policy	AA/PPL/S/048
Disciplinary Policy	AA/PPL/S/005
Conflict of Interest Policy	AA/PD/SOP/03
Data Governance Policy	AA/ISM/S/010
Personal Data Protection Legal Requirements	AA/LGL/S/009
Procurement SOP	AA/PRO/S/001
Safety Management System (SMS) Manual	Refer to respective Company manual
Anti-Bribery and Anti-Corruption Policy	AA/LGL/S/011
Non Disclosure and Confidentiality	AA/LGL/S/006

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Title	Document ID
Whistleblowing Policy	AA/IAU/S/001

5.0 VISION, MISSION AND VALUES

5.1 Vision

5.1.1 To be the leading global travel and financial tech company providing inclusive services in the travel, lifestyle, commerce, financial and logistics sectors.


5.2 Mission

5.2.1 Our mission is:

- a. To be the best company to work for whereby Allstars are treated as part of a big family.
- b. To create a globally-recognised Asean brand focused on delivering sustainable value to the economy, society and the environment.
- c. To leverage digital innovations to create a seamless lifestyle experience and provide highest quality products for our guests from travelling to dining, shopping, entertainment, culture, art, connectivity and logistics.
- d. To embrace technology to reduce costs to maintain cost leadership, enhance service levels and seek new growth opportunities.
- e. To care for all our stakeholders, from Allstars, guests, business partners and investors to communities and governments.

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5.3 Allstars's Values

5.3.1 Allstars's values are the way the Company describes its work culture (its way of working).

5.3.2 The values also give Allstars a common language for linking Capital A Berhad's culture to its low - cost digital mission, "Now Everyone Can Fly".

Table 5.3-1: Allstars's Values

a. Dare To Dream	Dream the impossible. Believe the unbelievable. We Dare to Dream.
b. Make a Difference	Get stuff done. Be passionate.
c. Change the Game	Keep moving. Do better. We Change the Game.
d. Win as One	We are always better together. We Win as One.
e. Celebrate all Individuals	People and their talents are at the heart of it all. That's why we Celebrate All Individuals.

6.0 WHY THIS CODE?


6.1 The purpose of the Code is to ensure we are fully compliant with all applicable laws and regulations. The Code guides how we behave towards each other and the outside world.

6.2 All applicable laws and regulations, written or practiced shall be strictly observed.

6.3 All stakeholders (i.e. shareholders, guests, suppliers, employees and the community around us) shall be treated with respect.

6.4 Allstars, directors, agents and representatives are expected to share and pursue the same beliefs and should avoid breach in any situation. For further guidance, Allstars may refer to the policies listed in item 4.0.

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6.5 Key aspects of the Code:

- a. Perform duties fairly, impartially, ethically and with utmost regard to safety.
- b. Comply with all applicable policies, laws and regulations.
- c. Behave with integrity in all relationships with guests, suppliers, communities and with each other.
- d. Respect the environment and minimize impact on it.
- e. Uphold the Company's integrity at all times to maintain a good reputation and its license to conduct business.
- f. Understand, respect and deliver on the three (03) new 'business bottom lines', i.e. Profit, People and Planet.

7.0 CODES APPLICABLE TO ALLSTARS

7.1 Display of Company ID

- 7.1.1 At all times, Allstars are expected to display their Company ID Card whenever they are within company premises.


7.2 Workstation

- 7.2.1 Allstars' workspace and vicinity should always be neat and tidy and no sensitive information or any private data should be left unsecured in the open.

7.3 Dress Code

- 7.3.1 Allstars are expected to be tidy and appropriately dressed.
- 7.3.2 Allstars who are to wear a special attire or are provided with uniforms, are expected to abide by the dress code and requirements set by the Company.

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7.4 Attendance and Punctuality

- 7.4.1 Allstars shall observe punctuality and regular attendance.
- 7.4.2 Allstars with regular office duties (those not involved in operations or marketing functions) are expected to be at their workstation during working hours.
- 7.4.3 When on duty, Allstars who are not based in the office (e.g. onboard, at tarmac or service counter) or whose job requires them to be mobile should always inform their supervisor of their whereabouts.
- 7.4.4 Allstars should be contactable during working hours.

7.5 Reporting an Absence or Sick Leave

- 7.5.1 Allstars who are going to be late for work or who are unable to come to work due to sickness or emergency shall make every effort to inform the supervisor of the reason for absence as soon as possible on the very first day of absence.


7.6 Absence without Leave or Reasonable Cause

- 7.6.1 Allstars shall not be absent from work without prior approval or without reasonable cause unless in case of emergency (life and death situation).
- 7.6.2 If an Allstar is absent without formally notifying their supervisor (either through call, email, chat message or SMS), the Company can, after due process, terminate their services.

7.7 Communication Expectations

- 7.7.1 All communication channels in Capital A Berhad, including corporate emails, are for official Company business and shall not be used for personal reasons. This

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includes the distribution of internal announcements, advertisement, cascading of decisions and sharing of information.

7.7.2 Allstars are expected to read all Company related news, information and announcements made by the Company via email or on any recognized official platforms.

7.7.3 Allstars, especially guest-facing ones, are expected to demonstrate proper behaviour at all times.

7.8 Safety, Health and Environment

7.8.1 Capital A Berhad is committed to provide a workplace that is free from hazards.

7.8.2 To achieve this, every Allstar is expected to comply with the safety rules in accordance with law of the land and safety practices described in their respective Safety Management System Manuals.


7.8.3 Allstars are responsible for maintaining a safe workplace. Hence, an Allstar shall immediately report to a supervisor or other designated person if the following occurs:

- a. accident;
- b. incident;
- c. injury;
- d. hazard;
- e. presence of unsafe equipment, practice or condition.

7.9 Harassment, Intimidation, Threat and Violence

7.9.1 The Company shall NOT tolerate ANY type of harassment, intimidation, threats or violence whether verbal, physical or visual. These actions or behaviors include, but are not limited to:

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- a. Derogatory / offensive comments based on:
 - i. gender;
 - ii. religion;
 - iii. racial or ethnic characteristics;
 - iv. physical attributes;
- b. spreading of malicious or nasty rumours;
- c. use of email, voicemail or other forms of social media to cause disharmony, disunity, feelings of hostility, hatred, bias or ill-will.

7.9.2 The Company shall not tolerate any form of sexual harassment and shall ensure compliance with the Anti-Harassment Policy.

7.9.3 Allstars are encouraged to speak up if the conduct of a fellow Allstar makes them feel uncomfortable and to report any form of harassment, threats or violence when it occurs.


7.10 Smoking, Gambling, Drugs, Alcohol and Prohibited Substance

7.10.1 Allstars shall not gamble or consume alcohol within the company premises, during the course of duty and for flight crew, ten (10) hours before flight duty.

7.10.2 Smoking within the office area or its vicinity or airport restricted area is strictly prohibited. To smoke, Allstars are advised to smoke ONLY in the designated smoking area(s).

7.10.3 Allstars are strictly prohibited from the use, possession, distribution or sale of illegal drugs or prohibited substances.

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7.11 Weapons

7.11.1 When handling or conducting Company business, Allstars are strictly prohibited from possessing any weapons or illegal materials (imitation or otherwise) including, but not limited to, firearms, explosives or sharp objects.

7.12 Use of Taboo / Inappropriate Words

7.12.1 *Allstars shall avoid the use of the following words, verbally or in writing, to any other Allstars, guests, business partners and visitors:


- a. bomb;
- b. hijack;
- c. sabotage;
- d. terrorist;
- e. missile;
- f. gun;
- g. explode;
- h. kill / murder - crew or someone onboard;
- i. announcing (in a confined space aboard an aircraft) having communicable disease that is contagious such as Chicken Pox, AIDS, Ebola, Covid-19 etc;
- j. using (in a confined space aboard an aircraft) vulgar words or sensitive proactive words that can create a chaotic environment such as political preference, aircraft crashes, etc;
- k. description of past events that led to a crash or disaster - such as September 11 attack and MH17 - with the aim of creating fear and distress.

Note:

*the list above is not exhaustive.

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7.13 Criminal Breach of Trust

- 7.13.1 Criminal breach of trust occurs when an Allstar who is given responsibility over a company property:
- steals it or puts it to wrong use, or
 - converts that property to own use, or
 - sells, throws or gives away the property without authorization
- 7.13.2 Allstars shall not commit a criminal breach of trust in violation of any law of the land in which the business is conducted. In context of Malaysian Law, criminal breach of trust is as defined under the Penal Code (Act 574).

7.14 Criminal Activities and Wrongdoings

- 7.14.1 Allstars shall uphold the good name and reputation of the Company at all times.
- 7.14.2 Allstars shall not engage or be involved in any behaviour or activities that may tarnish the Company's image.
- 7.14.3 Allstars shall not commit any criminal offence punishable under the law of the land in which the business is conducted.
- 7.14.4 If an Allstar is found to be involved in activities or behaviors that are subversive or has committed a wrongdoing (criminal or otherwise) that may be damaging or harmful to the image and reputation of the Company, the said Allstar shall be dealt with according to the Company policies and procedures stated in the Disciplinary Policy and / or be liable in the court of law.

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7.15 Equal Opportunity

7.15.1 The Company believes and shall, on the Company's best endeavour, provide equal employment opportunities to all applicants regardless of race, ethnicity, religion, national origin, gender or ability.

7.16 Reporting Breach of Rules and Declaration

7.16.1 Allstars shall inform their Head of Department if they know or are aware of any breach against a Company policy or rule.

7.16.2 It is also our duty to report them to Regional Fraud Investigation team or write an email to whistleblower@airasia.com on matters that we see as a breach against this code failing which is by itself a breach of this code. Our report will be treated confidentially and there will not be any repercussions against us if our report is made in good faith.


7.17 Act of Misconduct

7.17.1 Dismissal may be applied to any Allstars who, by his own act or failure, committed misconduct by not following the required standards of work or conduct. The Company determines, after due process, if misconduct or offense is sufficiently serious to justify dismissal.

7.17.2 Serious acts of misconduct are:

- a. actions that deceive the Company for personal gain;
- b. actions that bring disrepute to the Company; or
- c. actions that openly disregard important Company rules and regulations.

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7.18 Leaving the Company

- 7.18.1 Allstars shall return all Company assets including Proprietary Information and Intellectual Property upon leaving the Company for any reason whatsoever, including retirement.
- 7.18.2 Disclosure or use of any Proprietary Information is strictly prohibited.

8.0 CODES APPLICABLE TO GUESTS, BUSINESS PARTNERS AND VISITORS


8.1 Guests

- 8.1.1 The Company is committed to providing the best quality of services to guests. The Company shall treat guests with utmost respect and understanding.
- 8.1.2 The Company shall protect all guests' personal information.
- 8.1.3 Sharing of personal information shall ONLY be done with the guest's consent and agreement. For more details on handling of personal information, refer to the following:
- a. Data Governance Policy; and
 - b. Personal Data Protection Legal Requirements.
- 8.1.4 The Company shall reasonably honour any commitment made to guests. If a commitment cannot be honoured, prompt feedback shall be given to guests within the agreed time frame.

8.2 Business Partners

- 8.2.1 The Company treats business partners impartially and justly. Selection of business partners shall be done according to guidelines and rules established in the Procurement SOP.

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8.2.2 Participants of the procurement process shall uphold the basic principles of trust, honesty, fairness and transparency when conducting the business dealings. The goal is to procure goods, services and / or works that are finest in terms of quality, price, quantity, delivery, supplier and technology through open and transparent procedures that secure the highest returns for the Company.

8.2.3 Conflict of interest is a situation in which an individual's personal interest conflicts with the professional interests owed to the Company. Allstars handling procurement activities shall abstain or refrain from participating in the procurement process if such conflict exists. Refer to item 11.0 for more details on conflict of interest.

8.3 Visitors

8.3.1 All business visitors must be accompanied to the designated meeting area by an Allstar.

9.0 COMPETITION


9.1 The Company treats competitors honestly and professionally and competes fairly and openly at all levels.

9.2 The Company competes based on the following value offerings:

- a. by offering products and services at great prices and quality, and
- b. through superior execution of business models and strategies.

9.3 The Company shall strictly adhere to the local competition law in which the business is conducted, no matter how competitive the environment is. Questions on whether an action constitutes a violation of a competition law shall be referred to Group Legal.

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- 9.4 The competition practices prohibited shall be referred to the law of the land. For instance, in Malaysia, in accordance with Malaysian Competition Act 2010 (CA), companies are prohibited from:
- a. horizontal and vertical anti-competitive agreements; and
 - b. conduct that could constitute an abuse of dominant position.
- 9.5 Malaysian Competition Commission has published six (06) guidelines with regards to competition under the CA, which are as follows:
- a. Guidelines on Market Definition;
 - b. Guidelines on Anti-Competitive Agreements;
 - c. Guidelines on Abuse of Dominant Position;
 - d. Guidelines on Complaints Procedures;
 - e. Guidelines on Financial Penalties; and
 - f. Guidelines on Leniency Regimes.

10.0 COMPANY ASSETS

10.1 Responsibilities of an Allstar

- 10.1.1 Allstars shall protect the Company assets and properties assigned to them - from loss, damage, misuse, illegal use and theft.
- 10.1.2 Company assets and properties are meant only for business purposes and any other purposes approved by the management. Company assets and properties shall not be used for personal reasons.
- 10.1.3 All Company assets shall be returned to the respective department when it is no longer needed for business purposes.


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10.2 Internet Access and Software

- 10.2.1 Allstars shall use internet access provided for business purposes only, which includes conducting research related to the user's field of work.
- 10.2.2 The Company reserves the right to revoke an Allstar's company internet access if he / she is found abusing the computing facilities or using it beyond the scope of his / her work.
- 10.2.3 Materials from the internet that are or could be perceived as offensive from religious, political, racial or gender perspectives are classified as an "Objectionable Material". These include materials that have the potential to stir or cause hatred or ill feelings of various parties.
- 10.2.4 Objectionable Materials also include insensitive religious, sexist, political and racist comments as well as pornography and gambling.
- 10.2.5 Objectionable Materials shall not be transmitted or downloaded. Such activities are a serious breach of this Code.
- 10.2.6 Allstars are not permitted to participate in the creation or distribution of "chain letters", "flaming letters" or "poison pen" letters.
- 10.2.7 Allstars are also prohibited from participating in any other non-professional conduct or activities that involve personal attacks or broadcasting of unnecessary and irrelevant email content.
- 10.2.8 Allstars may only use software that is developed by the organisation or that is licensed or provided by the developer to the organization.
- 10.2.9 Allstars and business partners are to refrain from the following:
- a. Duplicating copyrighted material without the owner's / company's consent;
 - b. Copying software from one (01) machine to another without the owner's documented authority;
 - c. Copying Company proprietary software for use in computers that do not belong to the Company or for any purpose not authorized by the Company;
- and

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- d. Installing unauthorized software on the desktop (this is to prevent computer viruses from infecting the system).


10.3 Intellectual Property

- 10.3.1 “Intellectual Property” refers to all works completed during an Allstar’s employment which are considered to be protected as intellectual property rights, such as but not limited to trademarks, patents, service marks and copyright.
- 10.3.2 All Intellectual Property shall vest in and be the absolute property of the Company.
- 10.3.3 Allstars shall protect and administer Company Intellectual Property know-how, methods, concepts and ideas to the best interest of the Company.
- 10.3.4 Allstars shall also respect the intellectual property of others.
- 10.3.5 Unless required by law or public authority, Allstars shall not share any intellectual property accessible to them with unauthorized parties. Refer to the Data Governance Policy for more information.

10.4 Proprietary and Confidential Information

- 10.4.1 Some job functions may provide Allstars with access to a lot of information on Company operations, business and guests. Such information shall be treated as confidential unless the same have already been shared by the Company to the public.
- 10.4.2 Allstars shall use such information only for the purpose of carrying out their work.
- 10.4.3 Allstars shall protect and value all Proprietary and Confidential Information concerning the Company, guests and business partners.

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- 10.4.4 Allstars shall not (unless properly authorized) reveal trade secrets, customer information as well as secret or confidential information related to operations, processes and finances to any unauthorized party.
- 10.4.5 Allstars shall not use or try to use any of the information in a way that is likely to hurt or cause loss directly or indirectly to the Company or its shareholders.
- 10.4.6 Allstars shall not share sensitive Company information with others (even with family members) and shall ensure caution not to accidentally reveal such information (such as discussing the matters in public or over the phone and computer).
- 10.4.7 If an Allstar is required to disclose a Proprietary or Confidential Information, he / she shall ensure that he / she immediately notifies the Company in writing and obtain a written authorisation from the Company prior to such disclosure. Any unlawful or unauthorised disclosure of Proprietary or Confidential information may result in irreparable damage to the Company.
- 10.4.8 Use of the Company information for personal gain is strictly prohibited.
- 10.4.9 An Allstar shall not trade Company information or conduct “information brokering” with unauthorised parties.
- 10.4.10 As long as the information is deemed sensitive and confidential, the obligation to preserve confidentiality applies to all Allstars even after they have left the Company - unless the information has become publicly known.
- 10.4.11 This duty of confidentiality is required both by law and by the employment contract.

10.5 Trading on Insider Information

- 10.5.1 Allstars are not allowed to trade in securities based on Price Sensitive Information that is in their possession or that has come to their knowledge within the course of their employment with the Company. Price Sensitive Information is

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information that, if made generally available, would or would not tend to have material effect on the price or value of the Company stock / securities.

- 10.5.2 A person is an “insider” if that person possesses Price Sensitive Information and knows or ought to reasonably know that the information is not generally available to the public.


10.6 Accuracy of Company Records

- 10.6.1 The Company requires honest and accurate recording and reporting of information to make responsible business decisions. This includes, but is not limited to, quality records, safety records, personnel records and financial records.
- 10.6.2 All financial books, records and accounts must accurately reflect transactions and events and conform to requirements from both the approved accounting standards and the Company’s system of internal controls.
- 10.6.3 In the context of Malaysian Law, Section 2 of the Financial Reporting Act 1997 states “approved accounting standards means accounting standards which are issued or adopted by the Malaysian Accounting Standards Board (MASB) under paragraph 7(1A) (a) and 7(1A) (b) and in relation to foreign companies listed on a stock exchange in Malaysia, acceptable internationally recognized accounting standards”.

10.7 Recording and Retaining Business Communications

- 10.7.1 All business records and communications should be clear, truthful and accurate.
- 10.7.2 Business records and communications often become public through litigation, government investigations and / or the media.

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10.7.3 Allstars shall avoid:

- a. exaggeration;
- b. colourful language / impolite or rude words;
- c. speculation or suspicion;
- d. legal conclusions or judgement;
- e. derogatory or offensive remarks; or
- f. mischaracterization of people and companies.

Note:	This applies to all forms of communication.
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10.8 Sharing Best Practices


10.8.1 The Company allows and encourages sharing of best practices documents, information and knowledge with other companies or organizations provided that the information and knowledge shared are not regarded as Proprietary Information and is not damaging to or will adversely affect the Company's business and competitive advantage.

10.9 Dealing with Personal Data (in accordance with law of the land / local regulations)

10.9.1 In the context of Malaysian Law, the Personal Data Protection Act 2010 ("PDPA") regulates the processing of Personal Data used in commercial transactions. PDPA requires compliance to the seven (07) principles of personal data protection, as stated in table 10.9-1.

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10.9.2 This Provision shall be read together with the Data Governance Policy and Personal Data Protection Legal Requirements that describes the laws related to personal protection.

Table 10.9-1: Seven Principles of Personal Data Protection

Principle	Description
a. General Principle	<ul style="list-style-type: none"> i. Use personal data only for the purpose it was given or for compliance with legal obligations. ii. Consent is required if the data will be used for a different purpose or if sensitive personal data is being processed. Processing is defined as collecting, recording, holding or storing the personal data or carrying out any operation or set of operations on the personal data including outsourced process.
b. Notice and Choice Principle	<ul style="list-style-type: none"> i. Consistent with the concept of fair use, a data user must notify the individual about the nature of the personal data being processed, the purposes for which it is collected and further processed as well as the data subject's right to access and correct their Personal Data. ii. Notification can be in electronic form as long as the individual can record and keep a copy.
c. Disclosure Principle	<ul style="list-style-type: none"> i. Limit disclosure of personal data to the purpose that the data subject has been informed of at the time of collection and for which the data subject has consented. ii. A list of disclosures made to third parties must be maintained.

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Principle	Description
d. Security Principle	i. Take practical steps to safeguard personal data from loss, misuse, modification, unauthorised or accidental access or disclosure, alteration or destruction.
e. Retention Principle	i. Do not retain personal data longer than is necessary for the fulfillment of the purpose.
f. Data Integrity Principle	i. Take reasonable steps to ensure that the personal data provided is accurate, complete, not misleading and kept up-to-date by having regard to the purpose, including any directly related purpose, for which the personal data was collected and further processed.
g. Access Principle	i. Give the data subject access to the personal data held by the data user and ability to correct that personal data where it is inaccurate, incomplete, misleading or not up-to-date.


11.0 CONFLICTS OF INTEREST

11.1 Managing Conflict of Interests

11.1.1 This Provision shall be read together with the Conflict of Interest Policy so that Allstars can take this matter into account when forming their own judgment about any outside role, relationship or activity concerning them.

11.1.2 Conflicts of interest may arise when an Allstar's ability to perform his company duties effectively and impartially is potentially impaired by an outside appointment, relationship or activity.

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11.1.3 It is not possible to set out a detailed set of rules covering conflicts of interest as the set of rules could never cover all the circumstances. The following should, therefore, be regarded as being general guidelines that Allstars should comply with.

11.1.4 Allstars are relied upon to:

- a. exercise basic common-sense in avoiding any conflicts of interest;
- b. act in a manner consistent with giving full-time services to the Company; and
- c. avoid situations that may raise doubt on whether they have acted in the best interest of the Company.

Note:	Basic rule to prevent conflict of interest: prompt and fully disclose everything. CONSULT PAC IF YOU HAVE QUERY.
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11.2 Outside Business Appointment / Undertakings

11.2.1 Allstars may not accept employment or undertake work for any other company, firm or organization.


11.2.2 Any outside business appointment or undertaking, whether as an Allstar, executive director, active partner, advisor, agent, manager or consultant, whether on a paid or gratuitous basis, may only be undertaken if such positions are officially declared to the Company and are found to not conflict with the Company's interests.

11.3 Outside Non-Executive Directorships

11.3.1 Allstars may not accept outside non-executive directorship positions or become silent partners in entities that have any form of direct or indirect business

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dealing with the Company, whether as one of the Company's listed authorized contractors or their sub-contractors (of any tier).

- 11.3.2 If an Allstar becomes involved in such directorships or partnerships, say through the change in status of a business in which they hold a non-executive directorship or of which they are a silent partner, an Allstar has an obligation to inform the PAC immediately in writing. PAC will then consult said Allstar on the best possible way to prevent a conflict of interest.

11.4 Ownership of Equity in Entities Having A Business Relationship with the Company

- 11.4.1 Allstars may not directly or indirectly own, either through families, shares or other forms of beneficial interest, any equity in:
- a. privately owned entities that derive the major part of their income from contractual or other business arrangements with the Company;
 - b. privately owned entities that are listed in the Company list of authorised contractors or their sub-contractors of any tier, even if the entities concerned do not derive most of their income directly or indirectly from contractual or other business arrangements with the Company; and
 - c. privately owned entities that are directly or indirectly supplying materials, equipment, property and / or services to the Company.
- 11.4.2 If an Allstar becomes an investor in an entity or company doing business with Capital A Berhad, said Allstar must immediately inform the Company through PAC in writing about it and discuss to find the most appropriate way to avoid conflict of interest.
- 11.4.3 The above ruling does not apply to shares held by Allstars in publicly listed companies that have a business relationship with the Company, either directly or through a subsidiary. However, in this case, if there is any possibility that

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such a holding may cause conflict with the Allstar's duty as an employee, said Allstar should immediately raise the matter to PAC in writing.

11.5 Contractual Dealings with Allstar

11.5.1 The Company shall not purchase or lease property, equipment or materials from or enter into contractual arrangements (other than employment contracts) with an Allstar, except in exceptional circumstances and with written authorization by PAC.

11.6 Insider Information on Company Business


11.6.1 Some Allstars will, by nature of their position, be in possession of confidential information about the Company and / or its affiliates or associates.

11.6.2 It is important, from the Company and individual point of view, that no grounds are given to raise doubt that any information gained within the course of employment has been improperly used or used for personal advantage. Various detailed guidelines are issued from time to time to select Allstars on this subject.

11.6.3 Allstars should not, without authority, disclose any confidential information about the affairs of the Company and / or its affiliates or associates to ANY unauthorized person or use or appear to use such information for the benefit of their own self or others.

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12.0 GRIEVANCE HANDLING


A grievance is any type of problem, concern or complaint related to an Allstar's work or the work environment. A personal grievance can be about any act, behavior, omission, situation or decision impacting on an Allstar that the Allstar thinks is unfair and unjustified.

Capital A Berhad recognises the value and importance of full discussion in cleaning up misunderstanding and preserving continuous and harmonious relations amongst Allstars, and takes every reasonable effort to clear up misunderstanding and investigate any Allstar's grievance. The Company also ensures that such grievances are dealt with promptly, fairly and will be dealt with in accordance with the following procedure.

12.1 Grievance Handling Procedure

- 12.1.1 An Allstar who has a grievance may raise the matter with their immediate supervisor / Manager (within three (03) working days from the date the grievance incident took place) who will investigate and respond in a timely manner.
- 12.1.2 If no agreement is reached on such grievance within three working days since it was raised and / or the Allstar concerned remains unsatisfied by the decision under Step 1, Allstar may refer his / her grievance in writing to the Head of Department.
- 12.1.3 If no agreement is reached on such grievance within five working days and / or the Allstar concerned remains unsatisfied by the decision under Step 2, the matter shall be discussed with the Employee Relations ("ER") / People and Culture Department ("PAC"). The step involves a formal investigation of the grievance and a decision on the appropriate action to be taken and the corresponding outcome which will be undertaken by the ER team / PAC.

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- 12.1.4 The ER team / PAC shall commence with gathering the facts and information about the grievance and come up with a finding based on the analysis of available information. Once the finding is made, the ER / PAC will make recommendations about the grievance and resolve the issue of the employee.
- 12.1.5 If the Allstar is not satisfied with the outcome of formal procedure, he / she may appeal to the management. The management will call for a re-investigation and give the final decision impartially which is purely based on the facts and information available.

13.0 DISCIPLINARY ACTION

- 13.1 This provision shall be read together with the Disciplinary Policy.
- 13.2 After the due inquiry, an Allstar may be subjected to disciplinary action(s) for violating and breaching this Code, including but not limited to:
- a. a written warning;
 - b. demotion;
 - c. suspension without pay for a maximum of fourteen (14) days;
 - d. withholding of bonuses, increments or service award; and / or
 - e. termination or dismissal of employment.
- 13.3 An Allstar may be suspended from work for investigation purposes as prescribed by their local Labor Law / Disciplinary Policy.

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14.0 GIFTS, ENTERTAINMENT AND CORPORATE HOSPITALITY

14.1 This Provision shall be read together with the Conflict of Interest Policy.

14.2 Gifts, entertainment and corporate hospitality means anything of value. It can include, but not limited to, the provision of the following:


- a. wedding gifts;
- b. festival money packets (ang pao);
- c. hampers;
- d. paid holidays, airfare;
- e. college fee funding;
- f. golf club membership;
- g. hospitality outings (opera tickets, Formula1 tickets);
- h. entertainment (karaoke, expensive dinners, massages);
- i. healthcare reimbursements;
- j. discounts; house renovation;
- k. paid expenses (car repairs, stereo systems, appliances);
- l. facilitation pay.

14.3 The Company practises a “No Gift Policy” and expects Allstars’ complete adherence to the Anti-Bribery Anti-Corruption Policy. Any giving or receiving of any gifts will be seen as a violation of the said policy.

14.4 You may not give or offer a gift to or accept a gift from anyone with whom the Group conducts business where the gift would exceed customary courtesies associated with accepted ethical and general commercial practice. We are careful in offering or accepting gifts and business ‘courtesies’.

14.5 When gifts are received in the absence of a sender, the gift must be returned to the sender with a note of explanation on the company’s “No Gift Policy”. When gifts are being delivered by an anonymous sender; that gift must be informed to the Head of Department and / or immediate superior via email and to the Head of Legal via email. In the event the gift is perishable in nature, from an anonymous sender, then

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it should be shared with the department. In the event the gift is non-perishable in nature and from an anonymous sender; it should be deposited with the Head of Legal, who will record it with the details such as quantity, description, date received and department. The Head of Legal will notify the Head of Internal Audit with this detail. This gift can then be part of the “Company Annual Dinner Lucky Draw Prize” and / or to be used during the Company Annual Dinner. The Head of Legal can also deposit this particular gift to the Company Foundation Entity for a donation to an approved charity support center. The Group Internal Audit will conduct the relevant timely audits of the records of the gifts deposited with the Legal and Compliance Department.

- 14.6 The purpose of this requirement is to ensure that the offer or acceptance of a gift does not create an obligation or be construed by others to allege favoritism, discrimination or other unacceptable practice

15.0 HANDLE ISSUES OF CORRUPTION AND BRIBERY

- 15.1 We do not offer or accept illegal or inappropriate gifts, money or other things of value to obtain business or gain advantage for the company, ourselves or others.
- 15.2 We are strictly prohibited from offering to pay, paying, promising to pay or authorising the payment of money or anything of value to anyone in order to influence any act, decision or to secure any other improper advantage in order to obtain or retain business.
- 15.3 We abide by our Anti-Bribery Anti-Corruption Policy which is in compliance with the requirements of the Malaysian Anti-Corruption Commission Act 2009 (amended 2018) on the treatment of any unethical business practice.

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16.0 MONEY LAUNDERING

- 16.1 Money laundering is the process of making dirty money, gained through unlawful activities, such as drug trafficking or terrorist funding, appear to be clean / good money and have come from a lawful source. Money laundering is a crime.
- 16.2 Allstars shall not engage in any money laundering activity. It is illegal, dangerous and could have a serious impact on the Company, its directors and officers as well as negative repercussions far beyond the Company.
- 16.3 Allstars shall also prevent the Company from being used by others for this purpose.
- 16.4 In the context of Malaysia, money laundering offences fall under the Anti-Money Laundering and Anti-Terrorism Financing (Amendment) Act 2014.


17.0 DEALING WITH PUBLIC OFFICIALS, GOVERNMENTAL OFFICIALS AND REGULATORY OFFICIALS

- 17.1 All dealings with any Public Official (as defined in the Anti-Bribery Anti-Corruption Policy), must be ethical and lawful and in compliance with the said policy.
- 17.2 All employees and their immediate family members, agents and their immediate family members are prohibited from directly and indirectly providing or offering to give gifts, monies and anything of value to the Public Officials to influence any act or decision or to secure any improper advantage in order to obtain or retain business.

18.0 DONATIONS AND CONTRIBUTIONS

- 18.1 All charitable or non-charitable donations based on the Limit of Authority must demonstrate that there is no element of return and must be approved by the Deputy CEO or the Group CEO. Reasonable due diligence must be conducted to ensure

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that all recipient organizations do not practise illegal payments to any public officials or individuals that have affiliation to a specific political party.

19.0 SPONSORSHIP

19.1 Any form of sponsorship based on the Limit of Authority must have a clear business case and for specific objectives. All sponsorships must be verified by the Deputy CEO or the Group CEO to establish that it is not illegal payment or benefit-in-kind to public officials, political parties or organizations that have an affiliation to a specific political party.

20.0 POLITICAL CONTRIBUTIONS

20.1 Any form of political contributions either direct or indirect to any political parties, organizations or individuals engaged in politics is strictly prohibited.


21.0 ABUSE OF POWER

21.1 Abuse of power can occur both internally among staff and with external stakeholders. The effects can be damaging to morale and to working relationships.

21.2 Abuse of power can take various forms including, but not limited to:

- a. sexual harassment;
- b. bullying or harassing behavior;
- c. requesting Allstars to do personal favors or errands;
- d. pressuring an Allstar to distort facts or break any rules and regulation or any law;
- e. interfering with the ability of a colleague / fellow Allstar to work effectively (for example, by impeding access to information or resources);

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- f. using Company's letterhead or social media platform to draw attention to a personal request; or
- g. dismissing community concerns on a project without due consideration.

21.3 The Company takes a serious view of any abuse of power. Should any Allstar be found guilty after due inquiry, necessary actions shall be initiated to address the matter.

22.0 POLITICAL ACTIVITIES AND MOVEMENT

22.1 As a business entity, the Company maintains a neutral stand on political matters. This stand is equally applicable to the ruling government, opposition parties or any other political movements in any country.

22.2 The Company does not forbid / prohibit Allstars' involvement in politics, provided that all activities, campaigning and all political related events:


- a. take place outside of Company premises;
- b. is conducted during Allstars' own free time; and
- c. is not committed in the capacity as an Allstar.

22.3 An employee shall not let his / her involvement in such political activities create issues or embarrassment to the Company.

23.0 USE OF SOCIAL MEDIA


23.1 Social Media means forms of electronic communication through which users create online communities to share information, ideas, personal messages and other content including but not limited to Facebook (and its associated Facebook Messenger), YouTube, Instagram, Twitter, WhatsApp, Facebook Messenger, WeChat, Snapchat, Instagram, QQ, QZone, TikTok, Sina Weibo, Tumblr, Telegram, Reddit, LINE, Pinterest, Viber and LinkedIn.

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- 23.2 Allstars are strictly prohibited from engaging the following activities, during and after his employment with the Company, in his / her personal social media activities:
- a. disclosing the Company's non-public or confidential information and / or engaging in rumours or speculations about the Company;
 - b. posting defamatory, disrespectful, negative and / or offensive comments; derogatory language or graphics about the Company; and / or disparaging colleagues, vendors and / or customers;
 - c. participating in conversations or postings that are inconsistent with the Company's objectives or image; and
 - d. Associating, endorsing, linking and / or connecting the Company with any matter whatsoever.
- 23.3 The Allstars must:
- a. only publish on his / her personal social media site or account, content which is true and not misleading;
 - b. exercise good judgement and personal responsibility whenever using personal social media sites and tools;
 - c. be respectful and professional when using a personal social media site or account that may identify him as an employee of the Company; and
 - d. adhere to the Company's Code of Conduct pertaining to information, communication and contact with the media.
- 23.4 The Allstars undertake to update his / her employment information on the personal social media sites once he / she has left the employment of the Company including removing any profile picture of himself / herself in the Company's uniform or taken at the Company's premises or in any manner such that the Company may be associated to himself / herself.
- 23.5 The Company reserves the right to monitor the employee's public posting on his / her personal Social Media site or account to ensure that the employees do not act in a manner which is prejudicial to the Company's business, interest and / or reputation.

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- 23.6 The Company maintains a wide variety of electronic communications equipment and systems (“Company’s Systems”). The Company’s Systems shall be used to assist Allstars in carrying out the Company’s business only. No Allstars should have any expectation of privacy when using the Company’s systems.
- 23.7 This provision shall survive the termination of the employment agreement between the Company and the Allstar or the resignation or dismissal of the Allstar.
- 23.8 Any violation of this Provision may be deemed as a breach of the Allstar’s implied duty of trust and confidence owed to the Company and may render the Allstar open to disciplinary proceedings and dismissal from employment.
- 23.9 Any failure to comply with Provision 23.4 post-employment shall be a breach of the Allstar’s undertaking and the Allstars agree to the Company obtaining an injunction against the Allstar to enforce the said Provision and obtaining judgment against the Allstar for any loss incurred or damage suffered by the Company and the Allstar shall indemnify the Company on a solicitor and client basis for all costs incurred by the Company in the enforcement of this undertaking.

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24.0 PERFORMANCE MEASURES AND NON-CONFORMANCE CRITERIA

Activity	KPI
n/a	

25.0 LIST OF RECORDS

Form Name	Form No.	Owner
n/a		

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