

# CODE OF BUSINESS CONDUCT

Malaysia Airlines Berhad



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# Message from Group Chief Executive Officer

A strong culture of integrity and accountability is an aspect I want Malaysia Airlines and its subsidiary companies (collectively “the Group”) to be known for. As we strive to improve our performance to always fly high and fly proud, we should perform our job with professionalism and with the highest integrity. High ethical standards will keep us in the right direction and it will be a key factor in ensuring sustainable good business practices for the Group.

The Group Code of Business Conduct will provide you guidance on the principles of business conduct the Group wants’ each one of us to practice when we deal with each other and customers. It is meant to protect you as you carry out your duties on behalf of the Group. Having a Code of Business Conduct in place will help ensure that while striving for excellence, the Group maintains best practice standards at all times.

Good relations with our partners, customers, governments and other stakeholders are one of the keys to our success. Healthy relationships can be built by behaving honestly, with integrity and with respect for people. Failure to do so erodes trust and undermines the foundations on which we build our relationships and our business.

Everyone at the Group has an obligation to safeguard the Group’s reputation by upholding its Core Values and complying with the Code of Business Conduct.

# Introduction

The Group is committed to conduct its business fairly, impartially and in full compliance with all applicable laws and regulations inside or outside of Malaysia. Your professionalism, honesty and integrity must at all times be upheld in your business dealings with customers, vendors, suppliers, contractors, governments, regulators, investors, the business community as a whole and in the relationship with fellow employees.

You must know, understand and comply with the Code of Business Conduct. As you read this Code, you will learn the standards that are meant to protect you and how to apply them in your daily work. The Code provides specific ethical business practices that have been put in place to provide each one of you a safe, comfortable and transparent work place where respect, integrity, and doing things right will strive.

The Code may be supplemented by Directives, which contain further details, clarification, updates or amendments to the Code, issued from time to time by the Group, or any subsidiary of the Group. You are encouraged to seek clarification on the Group’s Code of Business Conduct from your Head of Department or the Ethics and Compliance Team, ask questions and report if there are any suspected violations of the Code.

## Core Values

The Group's Core Values: are PROFESSIONAL, PROGRESSIVE, CONNECTED and OPEN.



## Compliance with Relevant Laws and Regulations

The Group and its employees are bound by the law. Compliance with all applicable laws and regulations must never be compromised and this includes any laws inside or outside of Malaysia.

### Conflict of Interest (COI)

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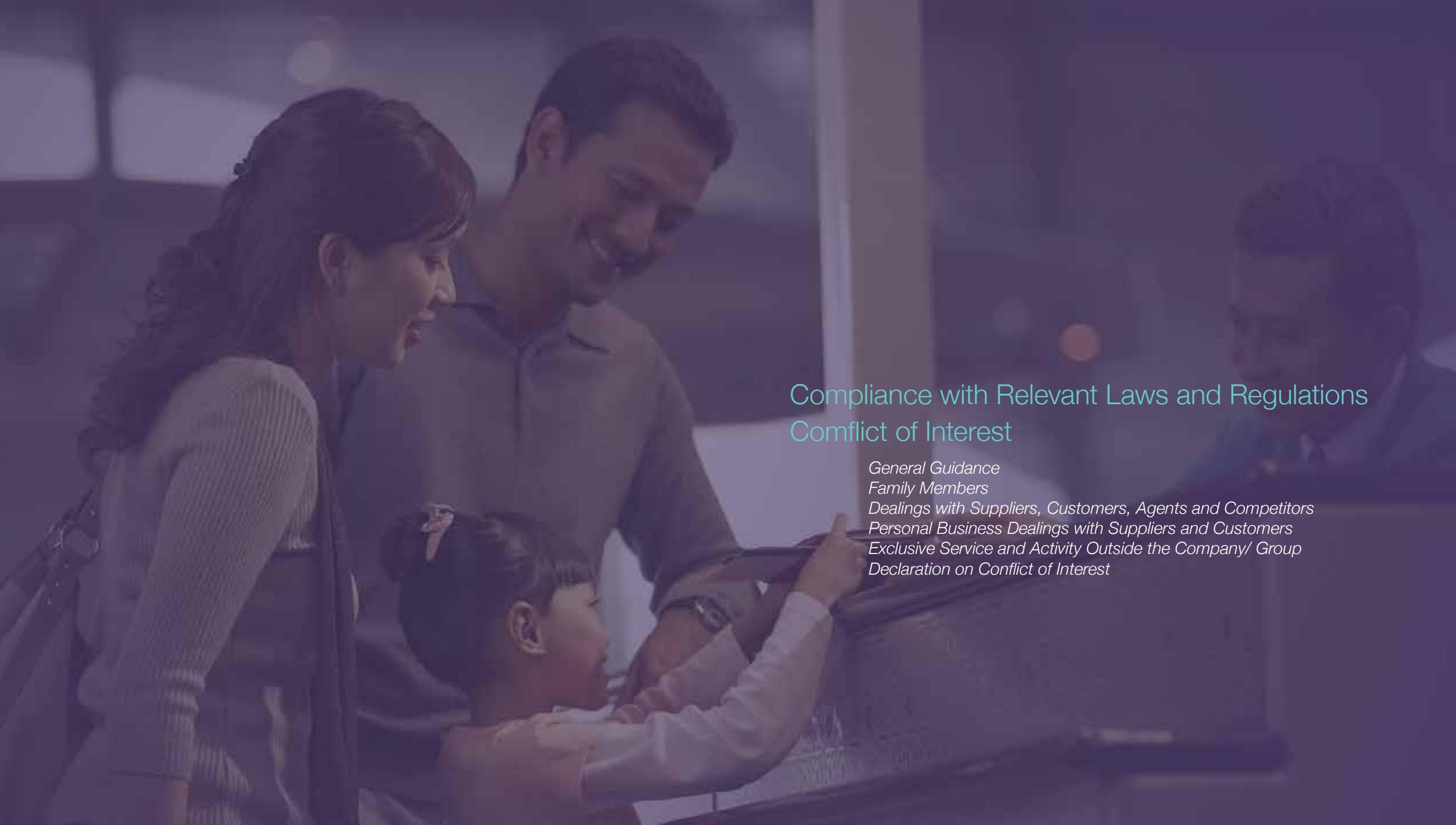
#### General Guidance

A Conflict of Interest (COI) arises when personal interests of an employee or the interests of a third party compete with the interest of the Group. You should avoid a COI situation at all times. A COI can make it difficult for you to fulfill your responsibilities impartially and objectively. A COI may influence your decision-making, or be perceived to do so, and jeopardize your reputation in the Group. If you find yourself in a COI situation, whether actual or potential, it must be declared to your Head of Department. Failure to declare the nature and scope of the COI may result in disciplinary action taken against you.

#### General Guidance

Family members as per definition of "persons connected" under Section 122A (2) of the Companies Act 1965 shall comprise of the employee's spouse, parent, child (including adopted and step child), brother, sister and spouse of his child, brother or sister.

You are required to disclose if you have any family members working within the Group. You should not hire, recommend hiring, exert influence over hiring decisions, supervise, affect terms and conditions of employment or influence Management regarding the engagement of any family members by the Group. Family members of an employee may be hired as employees or consultants only if the appointment is based on qualifications, performance, skills and experience, and in accordance with the Group's hiring policies and procedures.



## Compliance with Relevant Laws and Regulations Conflict of Interest

*General Guidance*

*Family Members*

*Dealings with Suppliers, Customers, Agents and Competitors*

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