

# WESTSTAR CORPORATE DISCLOSURE POLICY FAQs



## A. INTRODUCTION

These FAQs aim to assist staff in understanding and applying Weststar Aviation Services (“WAS”) Corporate Disclosure Policy with its principles and guidelines. The Company staff members are in the frontline of WAS’s fight against misconduct and corruption. As such, staff’s conduct in and outside of the workplace should be in compliance with the Policy. While not meant to be all-encompassing, these FAQs provide pragmatic information to help staff perform their duties and responsibilities.

## C. BACKGROUND

The Corporate Disclosure Policy (“CDP”) is a part of the corporate governance efforts of WAS. The CDP aims to develop and sustain a continuous line of appropriate and authorised communication with our shareholders and stakeholders to provide consistent, transparent, accurate and timely disclosure.

## D. FREQUENTLY ASKED QUESTIONS

### 1. What is Disclosure?

*Ans* The action of making information known

### 2. Who is responsible for implementing the Corporate Disclosure Policy?

*Ans* This Policy applies to all means or types of communication used by the Company to communicate with its shareholders, stakeholders, regulators, clients, suppliers, employees, which shall include but is not limited to the following:

- (i) written statements i.e. announcements, press releases, presentation materials, e-mails, the Company’s website, etc; and
- (ii) oral statements i.e. Chairman’s speech at General Meetings, telephone conversations, briefings, interviews, press conferences, roadshows or events, etc.

### 3. What other documents are relevant to WAS’s Corporate Disclosure Policy?

*Ans* The Policy is to be read with the Integrity Policy and Whistleblowing Policy. These Policies encourage positive corporate ethics and allow all employees to report any misconduct that breaches the terms of these policies.

### 4. What are the prevention of misuse or inadvertent disclosure of Material Information?

*Ans* Any employee privy to confidential corporate information is prohibited from communicating such information to anyone else, unless it is necessary to do so in the course of business or required by law or authorised by the Authorised Persons or the Designated Spokesperson. Efforts will be made to limit access to such confidential information to only those who “need to know” the information.

#### (i) Security and code names

Documents and files containing confidential information should be kept in a safe place or within the Company’s secured IT system, with accessibility restricted to individuals who “need to know” in the necessary course of their work. Code names should be used, where necessary.

#### (ii) No discussion in public places

Confidential matters should not be discussed in places where the discussion may be overheard, including but not limited to, elevators, hallways, restaurants, bars, restrooms, airplanes or taxis. If confidential matters must, of necessity or urgency, be discussed on wireless devices in public places, caution should be exercised by the participants. In such cases, the identity of any relevant party should be cryptic or in code.

## B. SCOPE

The FAQs policy applies to all WAS staff and all entities associated with the Company and its activities. In other words, it applies to all WAS-related activities, and to staff, borrowers, beneficiaries, bidders, suppliers, consultants, and contractors.

“WAS-related activity” includes finance, administration or support services, or any activity that materially affects or may affect or otherwise be relevant to the Company.

### (iii) Exercise caution when reading confidential documents in public places.

One should exercise caution when reading of confidential documents or smart phones or other personal digital assistant devices in public places.

#### Accompanying visitors

(iv) Visitors should be accompanied by Company personnel to ensure that they are not left alone in offices or areas containing confidential information.

### (vi) Non-participation in social media on matters relating to the Company

To mitigate the risk of inadvertently disclosing or publishing material and non-public information, employees are strictly prohibited from participating in internet blogs, chat rooms, similar social media forums (such as Twitter, LinkedIn or Facebook) or newsgroup discussions on matters pertaining to the Company’s business and affairs unless authorised to do so by the Designated Spokesperson.

## 5. What are the disclosure controls and procedures.

*Ans* It is the responsibility of all operational, corporate and business units and / or departments to keep the Compliance Officer and the Designated Spokespersons fully apprised of all significant developments in the Company so as to:

- (iii) facilitate determination of materiality, appropriateness and timing for public disclosure of the information, or whether the information should remain confidential;
- (iv) ensure appropriate understanding of significant developments and updates which may be relevant to ongoing communications with the investing public; and
- (vi) avoid denying significant developments when in fact, such developments are occurring.

## 6. Is there a Disclosure Committee in the WAS?

*Ans* Only the following Authorised Persons who “need to know” are authorised to have access and become privy to sensitive and Material Information that has not been disclosed and made available to the public:

- (i) Members of the Board of Directors;
- (ii) The Chief Executive Officer, Chief Operations Officer, the Chief Financial Officer and designated senior executives in the finance / account department; and / or

(iii) The Company Secretary, auditors, reporting accountants, lawyers, consultants and investment advisers on a “need to know” basis to enable such persons to carry out their roles and responsibilities

#### **8. What is Confidential Information?**

*Ans* Confidential information does not only relate to information regarding the Company but also information relating to the Company's customers/partners, which the employee has obtained during the course of his employment.

#### **9. How do I report allegations of integrity violations?**

*Ans* Report concerns or evidence of fraud or misconduct related to any WASrelated activities or its staff to Compliance Officer by e-mail, in person, or by telephone. Disclosure can be made to ANY of the following reporting channels, in a strictly confidential manner:

Email; to **whistleblowing@weststar-aviation.aero**;  
In person; to the Compliance Officer  
E-report; using the prescribed Whistleblowing Form available through the company websites; and  
Telephone; +603 4102 2222.

You will be assigned with a reference number and the Compliance Officer shall in communication with you.

#### **10. Who is the Compliance Officer?**

*Ans* As at October 2017, the Compliance Officer is **General Counsel & Company Secretary Director**

*If you wish to seek advice or clarification regarding the Integrity Policy, please e-mail your inquiry or concern to:*  
**governance@weststar-aviation.aero**