

INTEGRITY POLICY FAQs



A INTRODUCTION

These FAQs aim to assist staff in understanding and applying Weststar Aviation Services (“WAS”) Integrity 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.

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.

C BACKGROUND

The Policy applies to all employees and stakeholders of/persons providing services to WAS, whether permanent, contract, temporary, seconded and/or transferred, its subsidiaries, affiliates and/or entities under its management control and/or consolidation (“Stakeholders”).

D FREQUENTLY ASKED QUESTIONS

1. What is Integrity?

Ans Integrity is the quality of being honest and having strong moral principles; moral uprightness. In the aspiration to conduct its affairs in an ethical, responsible and transparent manner, this Policy supports the Company’s shared values and is the core of the Company’s governance processes.

2. Who is responsible for implementing the Integrity Policy?

Ans Yourself. Each employee has an important role to play in WAS’s fight against corporate misconduct, and each has a personal obligation to

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ensure the integrity of WASSB operations within their respective areas of responsibility

3. What other documents are relevant to WAS's Integrity policy?

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

4. What is the Declaration of Compliance and what is it for?

Ans The Declaration of Compliance is a mandatory on-line procedure for all staff members to formally certify that they have observed WAS's rules concerning employee conducts. In particular, a employees:

- i. Certifies that he/she has read and understood the following:**
 - Staff employment terms and regulations;
 - Company SQAD Policy; and
 - Integrity Policy, Whistleblowing Policy and Corporate Disclosure Policy.
- ii. Declares whether or not he/she or his/her immediate family members have any assets or interests that might reflect unfavourably on WASSB or that might be in actual or apparent conflict with his/her duties as staff.**

5. Who will administrate the Declaration process?

Ans The Compliance Officer.

6. When should the Declaration of Compliance be submitted?

Ans Employee will be requested to submit the Declaration of Compliance to Compliance Officer through email or hardcopy signatory.

The document shall be kept with the employee's personal file.

For new hire, HRAD shall lead the process with guidelines given by Compliance Officer.

7. What happens if a staff member fails to submit the Declaration of Compliance?

Ans Submission of the Declaration of Compliance is mandatory for all WAS employees.

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Failure to submit correct information in the Declaration will be considered a failure to observe an employment duty and may constitute misconduct.

8. Can I accept gift/s?

Ans Giving or accepting gifts is not allowed if the intention is to obtain a favor or influence other persons' performance of official duties.

As a general rule, WAS staff members and their immediate family shall NOT accept benefits, favors, or gifts from sources external to WAS with respect to any WAS transaction. However, when you or members of your immediate family find it difficult to refuse or decline benefits, favors, or gifts, promptly disclose this in writing.

9. How do I report allegations of integrity violations?

Ans Report concerns or evidence of fraud or misconduct related to any WAS-related 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

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