



Asia AeroTechnic

WHISTLEBLOWING POLICY

DOCUMENT VERSION CONTROL

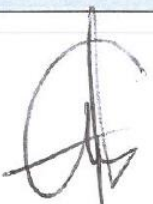
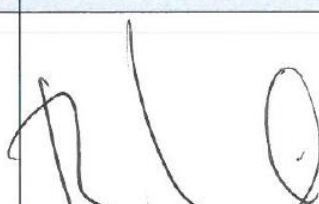
VERSION	EFFECTIVE DATE
1.0	2 JUNE 2023

**Document Owner:
Integrity & Governance**

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1. OBJECTIVE

This Manual provides an avenue for reporting by the Parties of corruption and bribery as covered under the Malaysian Anti-Corruption Commission Act 2009 (“Improper Conduct”) and protection for Whistleblowers under the Whistleblower Act 2010 . Any reporting shall be made in accordance with the procedures as provided for under this Manual.

2. SCOPE & APPLICABILITY

This Manual applies to all directors, employee and business associates of Asia AeroTechnic and is designed to facilitate the disclosure of Improper Conduct through available channels.

Improper Conduct shall be confined to the following:

- False claims
- Bribery and corruption; and
- Abuse of power

All directors, employees and business associates are required to read and understand the content of this Manual and may consult and seek advise from Integrity & Governance for further clarification.

3. CHANGES TO MANUAL

Asia AeroTechnic reserves the right to introduce, modify or delete any terms and conditions in this Manual and will publish the updated version on Asia AeroTechnic’s website.

4. DEFINITIONS

The terminology used in this Manual is to convey the level of compliance to the requirements set out is as follows:

- Must, Shall, or Will: The item mentioned is an absolute requirement and compliance is mandatory.
- Should, where possible, Recommended: Wherever possible, it has to be followed unless justified otherwise.
- May, Optional: The item mentioned is optional

“Manual”	Whistleblowing Policy
“Asia AeroTechnic”	Asia AeroTechnic Sdn. Bhd.
“Party or Parties”	Directors, employees and business associates
“Whistleblower”	The person who submits a complaint on Improper Conduct

5. QUALIFICATION AND EXCEPTIONS

Whistleblowers shall be protected as provided under the Act except for false, frivolous, baseless or malicious allegations made by a Whistleblower knowingly in bad faith. Any investigation conducted that later reveals that the alleged misconduct or criminal offence was made with a malicious intent will result in an appropriate action being taken against the Whistleblower including disciplinary actions.

6. ANONYMOUS WHISTLEBLOWER

Any Party who wishes to report Improper Conduct may opt to remain anonymous.

Whistleblowers are encouraged to provide their identities or contact details to facilitate Asia AeroTechnic to clarify or obtain further information for purposes of further investigation into the Improper Conduct.

Asia AeroTechnic reserves the right to investigate into any anonymous disclosure.

7. WHISTLEBLOWERS PROTECTION ACT 2010 (Act 711)

This Act provides protection to whistleblowers from any prejudicial actions due to the disclosure made and promotes disclosure of information on corruption, bribery, abuse of power or false claims.

7.1 TERMS OF PROTECTION

The Whistleblower allows for his/her identity to be disclosed to MACC for the purposes of investigation and may be required to attend and meet MACC officers either in the office or other identified locations.

The Whistleblower must reveal his identity and address in order to contact him/her in case further information is required.

7.2 TYPES OF PROTECTION

7.2.1 The identity of the Whistleblower and the information provided is kept confidential and will not be disclosed to anyone except for the investigating team. *(Section 7(1)(a) Whistleblowers Protection Act 2010)*

7.2.2 Whistleblowers will not be liable to any civil action, criminal or disciplinary consequences of such disclosure. *(Section 7(1)(b) Whistleblowers Protection Act 2010)*

7.2.3 Whistleblowers are protected from any act of prejudicial nature as the outcome of the disclosure made. *(Section 7(1)(c) Whistleblowers Protection Act 2010)*

7.2.4 Protection is extended to those who have connection / relationship with the Whistleblower. *(Section 7(3) Whistleblowers Protection Act 2010)*

8. COMPLAINT MANAGEMENT

- 8.1 Refer to the Process Flow attached as Appendix 1
- 8.2 Whistleblower must complete the Whistleblower Form, sample attached as Appendix 2

9. CONFIDENTIALITY

Reports, complaints including Whistleblower Form and documentations related to the case are kept under lock and key to ensure confidentiality is preserved.

10. PROTECTION OF WHISTLEBLOWER

The identity of the person making the report or complaint is not revealed and is only disclosed to the Board and the authorities on a need-to-know basis.

A Whistleblower will be accorded with the protection of confidentiality to his/her identity, to the extent reasonably practicable. In addition, an employee who whistleblows internally and/or within the company will be protected against any adverse and detrimental actions for disclosing any Improper Conduct committed or about to be committed within Asia AeroTechnic to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the Whistleblower is mistaken as to the facts and the rules and procedures involved.

The protection to the Whistleblower can be revoked under the following circumstances, among others:

- the Whistleblower participated in the Improper Conduct;
- the Whistleblower wilfully discloses a false statement;
- the disclosure is made with malicious intent; or
- the disclosure is frivolous or vexatious.
- the disclosure is made solely or substantially with the motive of avoiding dismissal or other disciplinary action.

11. DOCUMENTATION AND RETENTION

All documents will be kept secure and shall be retained for a period of seven (7) years unless a case has been instituted or there is an on-going proceeding.

12. ACTION ON FALSE ALLEGATIONS

Actions including legal or disciplinary actions may be taken where it is discovered that there are elements of false allegations, mischief and ill intentions when filing the report and complaint.

13. NOTIFICATION

The Whistleblower can expect that the report will be treated seriously, fairly and promptly. The Whistleblower may expect updates during and upon completion of the investigation, unless Asia AeroTechnic takes the view that such disclosure may impede investigation.

14. CONSEQUENCES OF NON-COMPLIANCE AND MISCONDUCT

Upon conclusion of investigation, it is determined that cases are with elements of bribery or corruption, the case will be referred to MACC or the police as appropriate.

For cases involving non-compliance and misconduct, the following actions may be taken:

- (a) Written warning
- (b) Any disciplinary action as appropriate (pay deferment, suspension, etc)
- (c) Immediate dismissal without notice
- (d) Termination of contract (with external parties)

15. REPORTING

15.1 Frequency of Reports

15.1.1 Reports are submitted to the Malaysian Anti-Corruption Commission two (2) times a year as follows:

- (1) On 31st July of the current year
- (2) On 31st January of the following year

Reports to MACC will be copied to MARA Integrity Unit and/or Group Integrity & Governance of MARA Corp.

15.1.2 Quarterly reports will be submitted to the Company's Board of Directors.

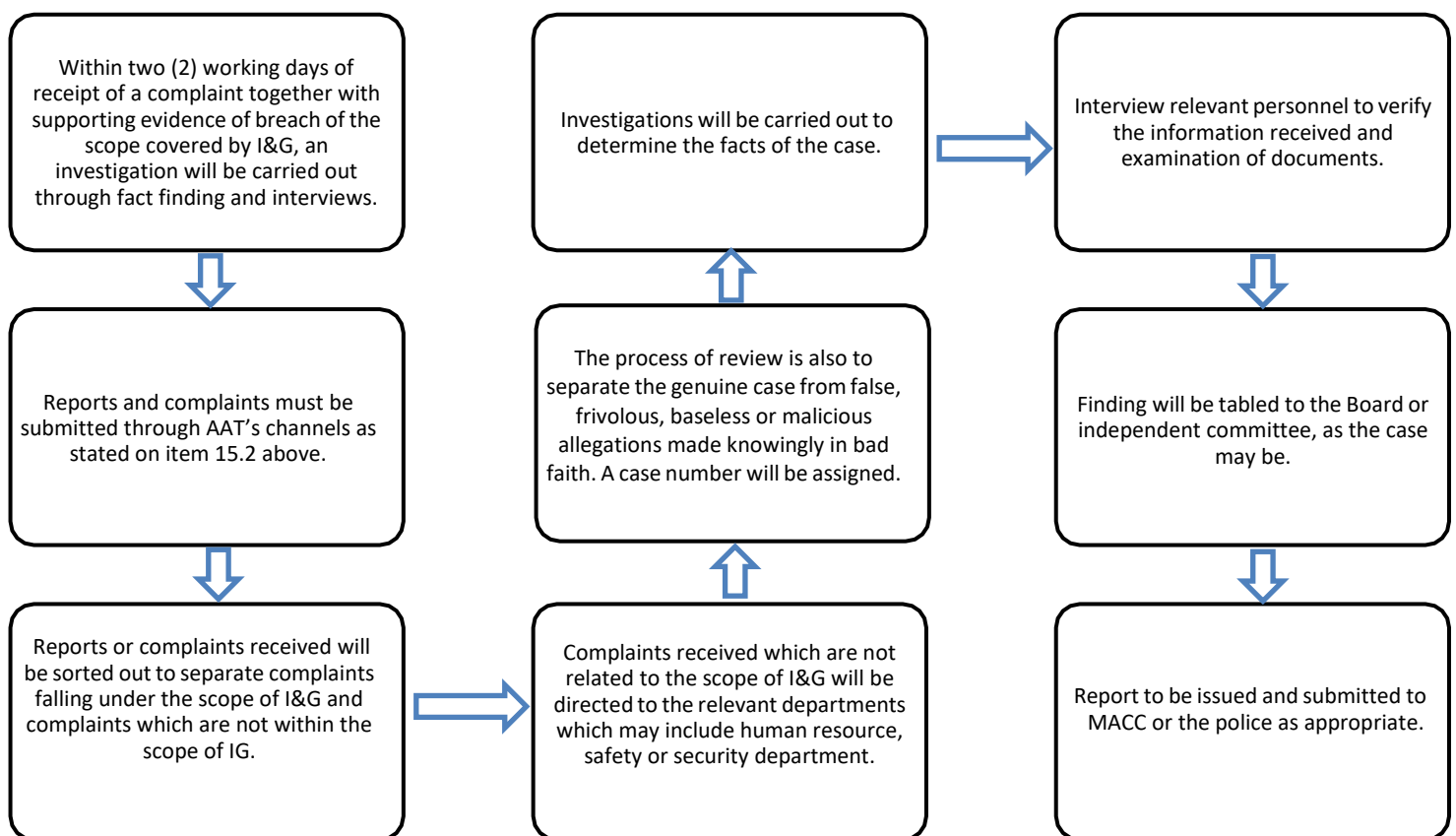
15.2 Reporting

Complaints can be submitted through the following channels:

For employees	For business associates
1) Direct complaints to the Integrity & Governance office at Hangar 1.	1) To complete the Whistleblower Form that can be obtained from AAT's website.
2) In a sealed envelope and to be hand delivered to: Integrity & Governance Office, Hangar 1, Sultan Abdul Aziz Shah Airport.	2) Email directly to ig@asiaaerotechnics.com
3) Complete the Whistleblower Form which is available through IMR system.	

APPENDIX 1

PROCESS FLOW OF WHISTLEBLOWING POLICY



APPENDIX 2

WHISTLEBLOWER REPORTING FORM

Please provide details of any alleged improper conduct in the form below and submit the completed form through Integrated Maintenance Recording (IMR). Please note that you may be called upon to assist in the investigation, if required.

<u>WHISTLEBLOWER'S DETAILS</u>			
Name/ Staff No:			
Contact Number:		Email Address:	
Please complete the form below:			
1) What was the improper conduct which had occurred? ▪ Bribe/corruption ▪ Abuse of power ▪ False claim			
2) Who had committed the Misconduct? Name: Designation: Time: Place/Location: Please advise the place or location of the improper conduct:			
3) Please provide details of witness if any: Name: Contact details (phone/email):			
4) Any Supporting evidence? If yes, please provide details.			
5) Any other details or information relevant to the investigation.			