

# Anti-Corruption Policy



## Anti-Corruption Policy

Asia Aviation Public Company Limited and Thai AirAsia Company Limited (collectively referred to as "the Company") are committed to conducting business with integrity, transparency, and in compliance with good corporate governance principles. The Company adopts a zero-tolerance approach to all forms of corruption and bribery. As part of the Capital A Berhad Group (referred to as "the Group"), the Company adheres to the Group's comprehensive Anti-Bribery and Anti-Corruption policy and procedures. This Anti-Corruption policy ("the Policy") statement serves as an overview of our anti-corruption system and practices.

### Definition

Corruption means any act of bribery by engaging in the act of directly or indirectly offering, promising, soliciting, asking, or accepting money, valuable items, or any inappropriate advantages with government officials, state or public agencies, or any concerned agents so that the said agents perform or refrain from performing their duties rightfully in order to gain or achieve unethical advantages for business. Exceptions shall be made should they be permitted by laws, rules, regulations, announcements, customs, local traditions, or common business practices.

Bribery means any act of offering, giving, receiving, or soliciting any advantage to improperly influence an action or decision, which may compromise ethical standards

Gift includes any item of value, including but not limited to cash, gift vouchers, hampers, travel benefits, entertainment, memberships, event tickets, commissions, reimbursements, promotional items, property, and home improvements. Gifts are subject to restrictions and are carefully monitored to prevent improper influence.

Facilitation payments mean small, unofficial payments intended to expedite routine governmental actions or administrative processes. Facilitation payments are considered a form of bribery and are strictly prohibited.

### Overall Policy

All Directors, members of Management, and employees of the Company are strictly prohibited from engaging in, implementing or accepting any act of direct or indirect corruption. The Policy audits or examinations shall be done regularly along with the revision of roles and duties of all relevant parties and the guidelines for practice, to keep the policy effective and aligned with evolving businesses, rules, regulations, and legal requirements.

### Roles and Responsibilities

1. The Board of Directors is responsible for approving and supporting the Policy, promoting a culture of integrity, ensuring policy awareness throughout the Company, and reviewing compliance reports to monitor effectiveness. Additionally, the Board ensures that resources are allocated to support anti-corruption initiatives.

2. The Audit Committee oversees investigations of related parties and matters within its authority, seeks external advice as needed, and reviews compliance with the Policy and guidelines related to fraud and

corruption. The committee shall also review the Company's internal control system and internal audit system to ensure that they are suitable and efficient.

3. The Chief Executive Officer and Management are tasked with implementing the Policy across the Company, allocating resources for anti-corruption measures, ensuring that anti-corruption standards are communicated to all employees, and evaluating the effectiveness of these practices to make improvements as needed.

4. The Internal Audit Department reports periodically to senior management and the audit committee regarding significant risk exposures and control issues, including fraud risks, governance issues, and other matters requiring the attention of, or requested by, the audit committee. In the event that the audit result indicates or suspects any fraud, the Head of Internal Audit shall immediately report such result to the chief executive officer and audit committee.

5. The Risk Management Committee ensures consistent implementation of the Policy, assesses corruption-related risks, provides regular updates to the Audit Committee, and recommends policy updates to address changes in the business environment or regulatory requirements.

6. The Risk Management Department facilitates anti-corruption compliance operations, conducts regular risk assessments to identify and address corruption risks, organises anti-corruption training for employees, submits quarterly compliance reports, and maintains relevant documentation for auditing purposes.

### **Operating Guidelines**

1. All directors, management, and employees at all levels shall uphold the Anti-Corruption and business ethics policy by not directly or indirectly engaging in any act of corruption.

2. Employees must report any observed corrupt practices through whistleblowing channels. Should employees have any questions or doubts, they can consult their supervisors or Risk Management Department.

3. The Company shall provide justice and shall protect whistleblowers and those who cooperate in reporting corruption as specified by the Whistleblowing Policy.

4. Violators of the Policy will face disciplinary actions and potential legal consequences. Business partners and suppliers who violate the Policy will also face proper consequences.

5. The Company will communicate and create understanding of anti-corruption initiative and awareness of the Policy to all stakeholders through various channel as well as mandatory training.

6. Specific guidelines are in place for high-risk areas such as gifts, entertainment and hospitality; and charitable contributions as follows.

To ensure operational clarity in high corruption risk issues, Directors, Management, and all employees must exercise extra caution when handling the following matters:

## **Gifts, Entertainments and Corporate Hospitality**

- The Company adopts a 'No Gift Policy' whereby Directors and Employees are prohibited from directly or indirectly, giving or receiving gifts, as defined under Gifts, Entertainment and Corporate Hospitality, that may influence good judgement and decision making, subject to certain limited exceptions.
- In certain cultural or business circumstances where refusing a gift could harm business relations, employees are required to submit a Gift Declaration Form to the approver who will decide whether to approve the acceptance of the gift or require the gift to be returned. Providing Gifts requires a written approval as specified by the policy.
- Entertainment and Corporate Hospitality, whether provided or received, should be reasonable and modest in value, provided in an open and transparent manner, and in compliance with Company policies and applicable laws. Employees are required to seek an approval by submitting a Gift Declaration Form prior to provision.

## **Corporate Social Responsibility, Sponsorships and Charitable Donations**

All corporate social responsibility activities, sponsorships, and charitable donations must be transparent, ethical, and in compliance with the Company's policies and applicable laws. Verification and approval of transaction shall be done according to Code of Conduct and related policies.

## **Facilitation Payments**

The Company does not have any policy to allow facilitation payments. All employees, directors, and representatives of the Company are prohibited from offering or making any facilitation payments, directly or indirectly, to government officials, customers, suppliers, or business partners.

## **Risk Assessment for Corruption**

The Company is committed to conducting appropriate corruption risk assessments as an integral part of our enterprise risk management program.

## **Dissemination of the Policy**

The Company will communicate the Policy to all stakeholders through various channels, including the Company's website, annual reports, internal communication, and training programs. Regular updates and reminders will be provided to ensure continued awareness and compliance across all levels of the organization.

## **Whistleblowing**

The Company has established whistleblowing channels for reporting suspected violations of the Policy. Any such instance shall be reported to [whistleblower@airasia.com](mailto:whistleblower@airasia.com). All reports will be treated confidentially and investigated thoroughly.