



WESTSTAR NO GIFT POLICY

Associated Policies

This policy should be read together with Weststar's Integrity Policy and Integrity Handbook. This No Gift Policy overrides and supercedes all related prior policies, procedures and guidelines of the Company related to gifts.

A. Introduction

Weststar is committed to conducting our business in the highest standard of integrity and good governance. Weststar's "No Gift Policy" prohibits all stakeholders, Directors, Management, employees (collectively "Weststar Personnel") from directly or indirectly, giving and accepting gifts in any form.

B. Scope

1. The Policy applies to Weststar Personnel, all stakeholders of/persons providing services to Weststar Aviation Services Sdn. Bhd., whether permanent, contract, temporary, seconded and/or transferred, its subsidiaries, affiliates and/or entities under its management control and/or consolidation ("Stakeholders").
2. Breach of this Policy by any Stakeholder may result in disciplinary action and other appropriate procedures, including but not limited to, dismissal or termination of the relevant contracts(s).

C. Policy Statement

1. The Policy prohibits the giving and/or accepting of gifts directly or indirectly both within and outside of the work premises in the course of their duties and business dealings which may influence in a decision-making process or put the Stakeholders in a position of conflict or appearance of such conflict or obligation.
2. Stakeholders are not allowed to accept gifts in exchange of doing or promising to do anything relating to the business or affairs of Weststar for potential or existing customers, vendors, agents, service providers, bidders, suppliers and any other individual or organization.
3. The enforcement of this policy is meant to ensure that Stakeholders act with ethics and etiquette and practice equal treatment and unbiased professionalism when dealing with any external party including regulatory or governmental agencies.



D. Objectives

1. Stakeholders and family members or anyone acting for or on behalf of the Company are strictly prohibited from receiving or providing gifts, entertainment and hospitality directly or indirectly.
2. In order to prevent the element of conflict of interest for either parties involved in business dealings with the Company, Stakeholders are bound to comply with this policy, as gifts, entertainment and hospitality might be construed as bribery and might adversely affect the Company's credibility or be in violation of anti-bribery and corruption laws.

E. No Gift Policy

1. Weststar Stakeholders are not permitted to offer or receive gifts in any forms. No one may, in connection with our business, offer, supply or accept gifts which are intended or can reasonably be viewed as a bribe.
2. Weststar Stakeholders must conduct their activities in full compliance with this No Gift Policy, the laws of Malaysia and of each jurisdiction in which the Company operates, and all applicable anti-corruption laws, including Malaysian anti-corruption laws, the UK Bribery Act and the United States Foreign Corrupt Practices Act ("FCPA").
3. Even if it may appear disrespectful to refuse a gift from an external party, nevertheless under no circumstances may a Stakeholder accept gifts in the form of cash or cash equivalent from parties that it deals with. The gift must be politely returned with a note of explanation about the Company's No Gift Policy.
4. The principle of integrity requires that Stakeholders of the Company should not place themselves under an obligation that might influence or be perceived to influence the conduct of their duties.
5. Examples of Gifts, include but are not limited to:
 - a. Cash or cash equivalents
 - b. Jewelry
 - c. Promotional items
 - d. Gift cards
 - e. Loans
 - f. Transportation
 - g. Vacations and weekend excursions
 - h. Tickets to sports, music, or cultural events
 - i. Home Improvements
 - j. Stocks and other securities
 - k. Favours
 - l. Other forms of compensation and benefit



F. Declining Gifts

1. Stakeholders are required to inform all counterparties they deal with, of this No Gift Policy. Stakeholders are expected to request that all counterparties respect our Company's Policy and not purchase and deliver any gift for our employees, a department, an office, employee's residence or the company, at any time, for any reason.
2. As stated in the policy, for any Gifts offered or received, you shall:
 - a. politely decline and explain Weststar's No Gift Policy;
 - b. return the gift received to the sender.

G. Review of the Policy

1. This Policy has been approved by the Board on the 19th of January 2023. Any subsequent amendments are subject to the Board's approval.
2. The Policy will be periodically reviewed by the Board to ensure it remains current and effective in accordance with the Company's practices and in compliance with any new/ amended regulations.
3. In the best practice of corporate governance, this Policy will be made available on the Company's website www.weststar-aviation.aero and in the Integrity Handbook as well.
4. The Integrity Unit shall ensure the enforcement of this Policy. Any Stakeholder who has any query relating to this Policy should consult with the Integrity Unit. If any employee with knowledge or suspicion of violations of this Policy, they shall report their concerns to the Integrity Unit.