

# CODE OF BUSINESS CONDUCT

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**SkyWorld**  
TRANSFORMING CITIES

A close-up photograph of a person's hand using a chisel to chip away at a concrete wall. The hand is on the left, and the chisel is positioned vertically, with the tip of the chisel embedded in the concrete. The background is a dark, textured wall.

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# A Message from our CEO



At SkyWorld, our values unite us in the way we work, every day, every where. They are the foundation of our culture — they show what's important to us beyond financial performance.

We do the right things in the right way, comply with the law, and work responsibly. We are ethical and honest. This has always been our approach to business. As we continually reshape and improve our business, one thing that will never change is our commitment to

operating with **integrity**. This commitment is vital to our success as a company.

In this Code of Business Conduct, you'll notice a recurring phrase: "**It Begins with Me**." Living up to our values as a company is only possible when each of us play their part. Keeping everyone safe, following the law, doing the right thing, showing respect to others — it all begins with me.

Please read this Code of Business Conduct and refer to it often. Should you ever have a genuine concern that this Code is being violated, you must speak up by reporting to management or Talents directly.

**Lee Chee Seng**  
Chief Executive Officer



## It Begins with Me

Our company culture is built by the day-to-day actions of you, our employees, the SkyRians. This Code of Business Conduct (“the Code”) is your practical guide to upholding SkyWorld’s values and acting ethically in our workplace, in our business practices and in our communities. Since the Code does not address all possible situations you might face in your work, you are expected to use good judgment and common sense, ask for guidance when uncertain, and speak up when something isn’t right.

Everyone who works for SkyWorld has a duty to read, understand, and abide by this Code. The Code applies equally to everyone, from temporary and part-time employees to our Executive Committee (EXCO).

No one is ever authorized to violate the Code. Anyone doing so is acting solely on his/her own behalf, contrary to SkyWorld’s best interests, and is subject to appropriate discipline.

Additionally, if you are in a management position, you have a responsibility to:

- Ensure each person on your team has read and understands the Code
- Lead with integrity: Model the good conduct you want to see in your team
- Foster an open-door culture where your team feels comfortable asking questions and raising concerns about conduct issues
- Embrace all initiatives and training that support the Code

## Making the Right Decision

At times you may be faced with a situation where the right thing to do isn’t obvious. To assist you in making the right decision, ask yourself these questions:



Is it legal?



Is it consistent with our values, ethics and culture?



Would I be comfortable telling my family and friends about it?



**Yes to all**

Move forward



**Unsure**

Get advice –  
speak to your  
Manager or  
contact Talents



**No to any**

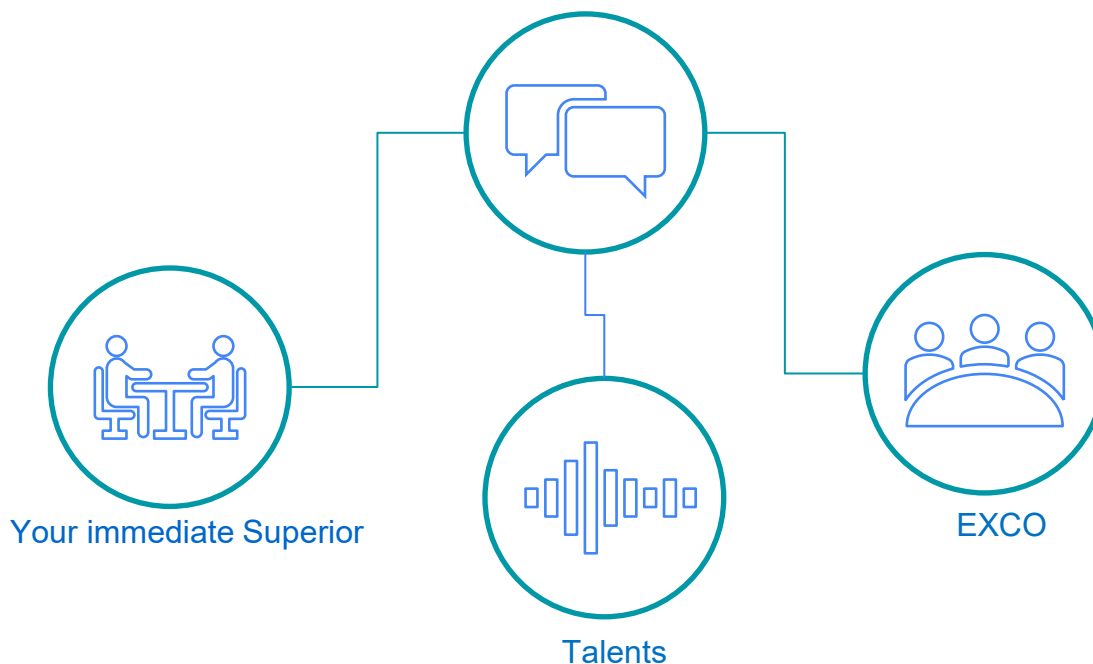
Stop, don’t  
do it!





# Reporting Concerns

If you have a genuine concern about a possible breach of the Code, you must speak up about it. There are three ways you can report your concerns. Throughout this Code, “REPORT” means to inform any of the following:



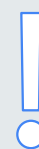
## The Objectives of the Code

- As a practical guide to upholding SkyWorld’s values and acting ethically in workplace, business practices and communities.
- To assist you in making the right decision.



## Who I report to and Who investigates my report?

Any suspected violation shall be reported to Talents function immediately and it should be brought to the notice of the EXCO. The report will be investigated by EXCO or person(s) designated by EXCO .



I want to report a concern but I’m afraid I will be retaliated against.

SkyWorld does not tolerate retaliation for reporting a genuine concern. Your report will be handled discreetly and in a confidential manner, to the extent reasonably possible and allowed by local laws.



# Conduct In our Workplace

- Putting Safety First
- Respecting Others
- Protecting Company Resources
- Maintaining Confidentiality & Avoiding Insider Trading
- Use of IT Systems & Social Media
- Keeping Accurate Records

## Putting Safety First

**“EVERYONE SHOULD GO HOME FROM WORK EVERY DAY UNHARMED. PUTTING SAFETY FIRST MAKES THIS POSSIBLE. OUR AIM IS ZERO-HARM”**

### At SkyWorld

We always put safety first. We must ensure a healthy and safe environment for all employees, contractors, customers and visitors at our locations.

Company takes strong commitment to continually improve on the standards set and expects constant safety vigilance by every employee.

### It Begins with me

- Work in a safe manner at all times.
- Comply with local safety requirements, as well as the Health & Safety requirements, measures, work rules and standard operating procedures set out in manual, handbooks and documents issued by the company.
- Maintaining a safe and healthy rules and reporting on workplace accidents, injuries and unsafe conditions.



If I see something unsafe, I will stop and do something!

## Respecting Others

**“RESPECT MEANS TREATING EVERYONE IN YOUR WORKPLACE THE WAY YOU WANT TO BE TREATED”**

### At SkyWorld

We provide equal, merit-based opportunities to all our employees, valuing their diversity, promoting inclusion and rewarding them fairly.

We do not tolerate discrimination, bullying, harassment, or any other behavior that is not reflective of our values

### It Begins with me

- Treat everyone in your workplace with dignity and respect
- Value diversity and the contributions of others
- Do your part to create a culture of respect and be actively inclusive in your work environment



# Protecting Company Resources (Assets & Data)

**“A COMPANY’S RESOURCES ARE ESSENTIAL TO ITS OPERATIONS. ITS PEOPLE, SHAREHOLDERS AND CUSTOMERS, ALL RELY ON THE SECURITY OF COMPANY ASSETS AND DATA”**

## At SkyWorld

Our assets take many forms, some of which are shown below. No matter the form, all assets and resources are valuable to our business and must be protected.

We all have a responsibility to use our assets and resources in a proper manner and for their assigned purpose.

## It Begins with me

- Safeguard all forms of SkyWorld assets, including from theft and damage
- Special care should be taken when handling the personal data of employees or customers, ensuring that it is secure and encrypted.
- Report any suspected theft, damage, misuse, fraud, embezzlement or improper usage.



I will take care of company property and will not steal or misuse anything





# Maintaining Confidentiality & Avoiding Insider Trading

**“CONFIDENTIAL INFORMATION IS PARTICULARLY SIGNIFICANT AND COULD INFLUENCE INVESTORS IF THEY WERE MADE AWARE OF IT (INSIDE INFORMATION). THE PURCHASE/SALE OF SHARE IN A COMPANY BASED ON INSIDE INFORMATION IS KNOWN AS INSIDER TRADING. INSIDER TRADING & PROVIDING INSIDE INFORMATION TO OTHERS SO THAT THEY CAN BUY OR SELL SHARES IN A COMPANY IS ILLEGAL”**

## At SkyWorld

Protecting our confidential information is crucial to our competitiveness, compliance with the law and relationships with stakeholders.

As a publicly traded company, we must comply with all relevant laws and regulations related to inside information and the trading of SkyWorld shares and securities.

## It Begins with me

- Only share confidential information for legitimate business purposes and if authorized to do so.
- Any inside information must be kept confidential.
- Insider trading is a complex topic; if you have any queries or concerns please contact Talents Function directly.

### WHAT IF ...

I heard that SkyWorld is about to purchase another company. The purchase will probably increase the share price. Can I mention this information to my husband?

No. This information is confidential. Also, If you, your husband trade SkyWorld shares or shares of the purchased company base on this information, all of you could be violating insider trading laws.

# Use of IT Systems & Social Media

**“IT SYSTEMS ARE VITAL FOR RUNNING BUSINESS. IT INCLUDE INTERNET ACCESS, EMAIL, COMPANY-ISSUED MOBILE DEVICES AND LICENSED SOFTWARE. SOCIAL MEDIA PLATFORMS ARE AN OPPORTUNITY TO SHARE TARGETED INFORMATION WITH A GLOBAL AUDIENCE”**

## At SkyWorld

IT systems should never be used to do anything illegal or unethical, including distributing, downloading or viewing unlawful, offensive, or otherwise inappropriate materials.

Communication with the public is only authorized through official channels including: press releases, formal company publications, media briefings, our website ([www.skyworld.my](http://www.skyworld.my)) and our official social media accounts. Conversations on social media should be respectful and professional.

## It Begins with me

- Use all IT systems responsibly and lawfully.
- Do not use social media to:
  - Share confidential information,
  - Violate the Code,
  - Engage in harassment, discrimination, or retaliation, or
  - Violate any other laws or ethical standards

### WHAT IF ...

I recently worked on the development of a new product. I'm proud of my work and I want to post some details about the new product on my personal Facebook account.

Since SkyWorld has not officially announced and launched the product, the product details are confidential and therefore should not be shared publicly.



## Keeping Accurate Records

**“IT IS IMPORTANT TO KEEP ACCURATE AND COMPLETE BUSINESS RECORDS AND TO ENSURE TIMELY AND ACCURATE REPORTING OF FINANCIAL AND NON-FINANCIAL INFORMATION AS REQUIRED BY LOCAL LAWS. ANY ATTEMPT TO HIDE, FALSIFY, OR MISREPRESENT INFORMATION IN ORDER TO MISLEAD OTHERS IS FRAUD”**

### At SkyWorld

We promote integrity throughout the Company and meet our responsibilities to stakeholders.

SkyWorld does not tolerate any form of fraud and requires all its employees to demonstrate a high standard of honesty and integrity in their work.

### It Begins with me

- Ensure all business records are complete and accurate.
- Never submit false or misleading information to any internal or external stakeholders i.e. customer or government authority.
- Report any actual, suspected, or attempted frauds.



I will hold myself to the highest standards of honesty and integrity in my work

SPEAK WITH HONESTY

THINK WITH SINCERITY

ACT WITH INTEGRITY







# Conduct in our Business Practices

- Refusing Bribery & Corruption
- Avoiding Conflict of Interest
- Complying with the Laws
- Preventing Money Laundering

# Refusing Bribery & Corruption

**A BRIBE IS ANYTHING OF VALUE THAT IS OFFERED, GIVEN, OR RECEIVED, WITH THE INTENTION OF INFLUENCING THE ACTIONS OF A PERSON OR COMPANY.**

- A BRIBE CAN BE MONEY, GIFTS, HOSPITALITY INCLUDING TRAVEL EXPENSES, BUSINESS OR EMPLOYMENT OPPORTUNITY, POLITICAL CONTRIBUTION TO INDIVIDUAL, CHARITABLE OR COMMUNITY DONATIONS AND OTHER FAVOURS OR BENEFITS.
- CORRUPTION IS THE ABUSE OF POWER FOR PERSONAL GAIN. EXAMPLES OF CORRUPTION INCLUDE EMBEZZLEMENT AND KICKBACKS

## At SkyWorld

SkyWorld is committed to abiding by all applicable anti-bribery laws. We do not tolerate any form of bribery or corruption.

## It Begins with me

- Never offer, pay, solicit, or accept bribes.
- Always avoid situations that could give the appearance of bribery or corruption.
- Be aware when dealing with government officials and regulators. Follow any local rules related to offering things of value to government officials.
- Read the *Anti-Bribery and Corruption Policy*

### A bribe can be:

<p>Money</p> 	<p>Gifts</p> 	<p>Hospitality, including travel expenses</p> 	<p>Business or employment opportunities</p> 
<p>Political contributions</p> 	<p>Charitable or community donations</p> 	<p>Other favours or benefits</p> 	<p>Facilitation payments</p> 



I would not offer or take any bribes nor will I engage in corruption of any sort.

# Avoiding Conflict of Interest

**A CONFLICT OF INTEREST OCCURS WHEN AN EMPLOYEE'S PERSONAL INTERESTS INTERFERE WITH HIS/HER ABILITY TO ACT IN THE BEST INTERESTS OF THE COMPANY.**

## At SkyWorld

A conflict of interest that influences your business judgment is a violation of the Code.

Having a potential conflict of interest is not automatically a violation of the Code, but failure to disclose it

## It Begins with me

- Disclose all potential conflicts of interest you may have.
- If you have questions on the disclosure process, contact Talents Function directly.
- Do not act as the decision maker where there is a conflict.
- Report any situation that you believe may be a conflict of interest via [Conflict of Interest Declaration Form](#).



Is it a conflict? Ask yourself:

A. Could my personal interests or relationships influence the decisions I make?

B. Could it look that way to someone else?

If yes, it is a conflict. Seek guidance when you are not sure.



I will avoid conflicts between my private interests and my job. If there is a potential conflict, I will disclose it.





## Complying with the Laws

**LAWS, RULES AND REGULATIONS, WHICH ARE PUT IN PLACE BY THE AUTHORITIES AND GOVERNMENT.**

### At SkyWorld

We are committed to comply with all laws, rules and regulations that are applicable to our businesses.

Violations of these laws can negatively impact our reputation and could result in penalties.

### It Begins with me

- Report any actual or suspected breaches of any law to your Manager or FACe Head and copy to Talents Function.

## Preventing Money Laundering

**MONEY LAUNDERING IS USING OTHERWISE LAWFUL BUSINESS TRANSACTIONS AS A WAY TO HIDE THE SOURCE OF MONEY THAT HAS BEEN OBTAINED ILLEGALLY. IT IS “CLEANING” FUNDS OBTAINED FROM CRIMINAL ACTIVITIES.**

**MONEY LAUNDERING TYPICALLY INVOLVES PAYMENTS IN THE FORM OF CASH OR MONEY ORDER. SUSPICIOUS ACTIVITY INCLUDES: LARGE CASH TRANSACTIONS AS WELL AS CUSTOMERS WHO ARE RELUCTANT TO PROVIDE VERIFIABLE INFORMATION.**

### At SkyWorld

We are committed to comply with applicable anti-money laundering and anti-terrorist financing laws and regulations. We do not condone, facilitate, or support money laundering or terrorist financing.

### It Begins with me

- Watch out for irregularities in the way payments are made.
- If you have concerns about a payment, request an alternative form be used and report the concern to your Manager.
- If the transaction seems suspicious, report it to FACe Head or Talent Function, even if you do not move forward with the transaction.



# Conduct In our Community

- Engaging with and Supporting the Community

# Engaging with and Supporting the Community

**BEING A RESPONSIBLE COMPANY MEANS DEVELOPING TRUSTING RELATIONSHIPS AND CREATING A LONG TERM POSITIVE IMPACT IN THE COMMUNITIES IN WHICH WE OPERATE**

## At SkyWorld

We take our community engagement responsibility seriously. All community engagement and interaction is respectful and appropriate.

We encourage employees and businesses to develop local interests and involvements which support the development of a thriving community and a better overall living environment.

## It Begins with me

- Be a good neighbor in your local community. Find ways to make a positive impact, while following local company guidelines on community engagement.
- Where possible, develop a community engagement plan.



I will be a good neighbor in my local community







# SkyWorld

TRANSFORMING CITIES

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Code of Business Conduct