



# ***VENDOR CODE OF CONDUCT***

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## 1. INTRODUCTION

Asia AeroTechnic is a Maintenance Repair Overhaul organisation (“MRO”) operating within a highly regulated aviation industry.

As an MRO serving the domestic and international market, Asia AeroTechnic is obligated to observe standards and regulations imposed by international airworthiness authorities and the Civil Aviation Authority of Malaysia.

Adherence to such standards is important to ensure the safety of aircraft and passengers.

To achieve this objective, Asia AeroTechnic has to ensure that it is supported by Vendors with integrity, professionalism and good ethics.

This *Vendor Code of Conduct* provides guidance to vendors, suppliers, contractors and third parties providing goods and services (“Vendor”) on expected business conduct and ethical practices when dealing with Asia AeroTechnic.

## 2. MANDATORY REGISTRATION

- (i) All Vendors must be registered with Asia AeroTechnic prior to providing goods or services. To register, Vendors shall complete the Vendor registration form which can be obtained by sending an email to [supplychain@asiaaerotechnics.com](mailto:supplychain@asiaaerotechnics.com).
- (ii) The registration form will be accompanied by a **Declaration of Integrity** which is to be completed and submitted together with the registration form.

## 3. COMPLIANCE WITH LAWS AND POLICIES

- (i) Vendor commits to maintaining a high standard of integrity and professionalism in the performance of its obligation.
- (ii) Vendor shall ensure compliance with any and all laws (including the Malaysian Anti-Corruption Act), regulations or other requirements.
- (iii) Vendor shall observe the following policies of Asia AeroTechnic:-
  - (a) No Gift Policy
  - (b) Conflict of Interest Policy
  - (c) Anti-Bribery Policy
  - (d) Confidentiality Policy
  - (e) Personal Data Protection

## 4. GIVING AND RECEIVING

- (i) Vendor shall **NOT** directly or indirectly offer or give employees of Asia AeroTechnic or those associated to Asia AeroTechnic, anything of value or any other form of gratification as consideration for a decision, opinion, recommendation, vote or other exercise of discretion.
- (ii) Vendor shall **NOT** accept or agree to accept from anyone including employees of Asia AeroTechnic, anything of value or any other form of gratification in connection with the business dealing or arrangement with Asia AeroTechnic.

- (iii) No gift, entertainment, gratuity, benefit or any other form of gratification should be offered or given to employees of Asia AeroTechnic including their family members, or those associated to Asia AeroTechnic except *souvenirs of nominal value reflecting the Vendor's corporate brand and modest meals for the purpose of business and networking.*

*Food and fruit hampers (of reasonable value and not excessive in volume and value as to be construed as a bribe) are acceptable during festive seasons and may be given to a department and not to individuals.*

## 5. PERSONAL DATA PROTECTION

Vendor confirms that it has read and understood the Privacy Statement on Asia AeroTechnic's website at [www.asiaaerotechnics.com](http://www.asiaaerotechnics.com).

## 6. CONFIDENTIALITY OBLIGATIONS

Vendor shall observe confidentiality obligations and shall not disclose to anyone of dealings, transactions, content of discussions and meetings; or details and information accessible to Vendor or made available to Vendor on Asia AeroTechnic or by Asia AeroTechnic.

## 7. CONFLICT OF INTEREST

Vendor shall declare any conflict of interest which may give Vendor an advantage or preferential treatment, including family ties or relationship with Board members, management of Asia AeroTechnic or employees through the **Declaration of Integrity**.

## 8. SAFETY AND ACCESS TO FACILITY

- (i) As Asia AeroTechnic is located at the airside, Vendor must obtain access pass from the Security Office of Malaysia Airports at SkyPark Terminal in Subang.
- (ii) Vendor must observe the airside rules imposed by the airport authorities and rules and regulations of Asia AeroTechnic while at Asia AeroTechnic's facility. This is to ensure the safety of all including Vendor's employees.

## **9. CONDUCT AT WORKPLACE**

- (i) Vendor shall conduct itself in a professional manner (including observing Asia AeroTechnic's dress code and rules and regulations) in its dealings with Asia AeroTechnic and while at Asia AeroTechnic's facility.
  
- (ii) Asia AeroTechnic does not tolerate any disruptive, abusive or discriminatory behaviour and will not hesitate to revoke the pass issued to the Vendor for access to the facility and take actions against the Vendor or employees of Vendor.

## **10. STANDARD OF SERVICES**

Vendor shall honour its commitment, meet the standard of service and the quality of product that has been agreed between Vendor and Asia AeroTechnic.

## **11. NON-COMPLIANCE AND IRREGULARITIES**

- (i) Vendor understands that appropriate actions including termination of contract, lodgement of case with Malaysian Anti-Corruption Commission (or the police as the case may be) and legal action may be taken in the event of violation and/ or non-compliance with this Code of Conduct.
  
- (ii) Vendor, upon being aware of a corrupt act or integrity violation shall immediately notify Asia AeroTechnic's Integrity & Governance Unit.

Any allegation of misconduct including corrupt act and integrity violation must be supported by required evidence and documentation.

**Appendix 1: DECLARATION OF INTEGRITY**

I/We <individual name/company name> <NRIC/ Company Registration No.> confirm and declare the following to be true and correct:-

- (a) Our shareholders/ directors/personnel holding key management positions and their close family members<sup>1</sup> do not have any relationship with any employee or Board members of Asia AeroTechnic except as stated in the table below:-

No	Name (on Vendor's side)	Name of Asia AeroTechnic's employees	Relationship

I/We shall inform Asia AeroTechnic of any changes to the above.

- (b) I/We confirm that we have read and understood the *Vendor Code of Conduct* (the "Code") and shall conduct ourselves in a professional and ethical manner in line with the Code throughout my/our engagement by Asia AeroTechnic.
- (c) We acknowledge Asia AeroTechnic's Anti-Bribery Policy and No Gift Policy which are in place and shall comply with the requirements of the Malaysian Anti-Corruption Commission with regards to corruption and bribery.

Any non-compliance shall be promptly reported to Integrity and Governance Unit of Asia AeroTechnic.

Signature of authorised representative of <name of Company>

\_\_\_\_\_

Name:

Designation:

Date:

\_\_\_\_\_

<sup>1</sup> Refers to spouse, children and spouse, parents, siblings, in-laws, siblings of spouse and children