



CODE OF BUSINESS ETHICS FOR THIRD PARTIES

MEASAT Global Berhad

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TABLE OF CONTENTS

1.0	INTRODUCTION	3
2.0	APPLICATION AND RESPONSIBILITY	3
3.0	COMPLIANCE WITH LAWS AND REGULATIONS.....	3
4.0	BRIBERY, CORRUPTION AND FRAUD	3
5.0	SANCTIONS	3
6.0	NO GIFT POLICY	4
7.0	CONFLICT OF INTEREST	4
8.0	CONFIDENTIAL INFORMATION AND DATA PROTECTION	4
9.0	COMPETITION	4
10.0	FREEDOM AND EQUALITY IN LABOUR PRACTICES	5
11.0	SEXUAL HARRASSMENT	5
12.0	WHISTLEBLOWING CHANNEL.....	5

1.0 INTRODUCTION

MEASAT Global Berhad and all its subsidiaries (“**MGB**” or “**Company**”) are committed to upholding the highest standards of integrity, transparency and accountability in all our business activities. The Company firmly believes that ethical conduct forms the foundation of a successful and sustainable business relationship.

This Code of Business Ethics (“**Code**”) set outs the minimum requirement expected of all parties engaging in business dealing with the Company in line with the Company’s core values and commitment to ethical business practices.

Failure to comply with this Code may result in the termination of all business relationships with the Company.

2.0 APPLICATION AND RESPONSIBILITY

This Code applies to the Company and all parties, including their employees, directors, agents, contractors, sub-contractors, suppliers, consultants and advisors engaging in any business dealings with the Company (collectively referred to as “**Third Parties**”).

The Third Parties may report any suspected misconduct or violations and communicate concerns regarding compliance with this Code via the Company’s Whistleblowing channel.

3.0 COMPLIANCE WITH LAWS AND REGULATIONS

The Company and Third Parties must comply with all laws, regulations and legal requirements that are applicable to each party. In the event of any non-compliance, the parties have the right to inform or report the matter to the relevant authorities.

4.0 BRIBERY, CORRUPTION AND FRAUD

MGB adopts a zero-tolerance approach to all form of bribery, corruption and fraud.

Both the Company and Third Parties should uphold all applicable anti bribery and corruption laws, regulations, rules, directive and guidelines in Malaysia and / or countries in which it operates. The Third Parties must comply with the MGB Company’s Anti-Bribery and Corruption Policy as well as other relevant policies published by the Company. Third Parties are also expected to promptly report any bribery or corruption to the Whistleblowing channels or the police, to enable proper investigation and appropriate action against the offender.

5.0 SANCTIONS

MGB and the Third Parties are prohibited from conducting businesses with certain jurisdictions or individuals subject to international sanctions or export laws and regulations. This includes

refraining from any conduct that could position either themselves or the Company in violation of such sanctions or export laws and regulations.

A Third Party involved in any activities with any countries, organizations or individuals subject to sanctions, restrictions or export laws must make a formal declaration to MGB.

6.0 NO GIFT POLICY

As a general rule, MGB practices a “No Gift Policy”, where the directors and employees are prohibited from directly or indirectly, giving or receiving gift that may influence good judgement and decision making.

Consequently, the parties should not give nor accept such benefits that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies, or would cause embarrassment. The parties must not provide, offer or accept bribes, kickbacks, corrupt payments, facilitation payments or inappropriate gifts, payment in cash or in kind, regardless of local practices or customs in any jurisdiction in which the parties have a business in.

Festive gifts, door-gifts and other promotional gifts are only permitted where the cost is reasonable.

Entertaining by or of third parties must be reasonable in its extent and appropriate to the particular business circumstances.

7.0 CONFLICT OF INTEREST

MGB expects the Third Parties to conduct their business activities with integrity and to remain free from any actual, potential, or perceived conflicts of interest. Third Parties must avoid such situations and disclose any circumstances that may give rise to a conflict of interest situation upon discovery.

8.0 CONFIDENTIAL INFORMATION AND DATA PROTECTION

It is fundamental that the parties respect confidentiality and privacy of all information. As such, the parties must comply with all applicable data protection, privacy, and information security laws, regulations, rules, directive and guidelines in Malaysia and / or countries in which it operates.

It is crucial that the parties safeguard all confidential information and personal data and do not disclose the information to other parties without proper authorization.

9.0 COMPETITION

MGB is committed to fairness and honesty in all business dealings. Therefore, MGB expects all Third Parties to conduct their business in a fair, ethical, and lawful manner, and to comply with

all applicable competition and antitrust laws. The parties must avoid engaging in any anti-competitive practices such as price fixing or abuse of possible dominant market positions.

10.0 FREEDOM AND EQUALITY IN LABOUR PRACTICES

MGB strives to uphold fundamental human rights; prohibiting the use of all forms of modern slavery and child labour; treating all individuals fairly, equally and with respect.

In this regard, the parties will not employ or engage child labour or young persons contrary to local laws and international practices. The use of any form of forced or compulsory labour is strictly prohibited, and any form of slavery or human trafficking is not permitted in all the business operations.

To maintain a safe and healthy workplace, the parties shall not engage in or support any form of discrimination. The parties will treat their employees with respect and free from any form of harassment, threat, intimidation, violence or any other inappropriate behaviour. The parties will not subject anyone to torture or to cruel, inhuman or degrading treatment or punishment.

11.0 SEXUAL HARRASSMENT

MGB is committed to providing a work environment that is safe, respectful environment free from harassment or offensive conduct. MGB expects the Third Parties to uphold these values by ensuring that their employees, representatives, and agents maintain professional conduct at all times.

Sexual harassment in any form whether verbal, physical, visual, or otherwise is strictly prohibited. Accordingly, the parties have implemented or will implement appropriate policies and procedures to prevent sexual harassment and to address any complaints promptly and effectively in accordance with applicable laws and best practices.

12.0 WHISTLEBLOWING CHANNEL

If a Third Party becomes aware of any fraudulent activities, misconduct, bribery, corruption, breach of confidentiality or violation to this Code, or reasonably believes that an employee of the Company has committed fraud, misconduct, bribery, corruption or any violation to this Code, a report may be made via the following whistleblower channels:-

- a) Email address: wbc@measat.com or
- b) Whistleblowing Committee Chairman at Jalan Teknokrat 1/2, Cyberjaya, 63000 Cyberjaya, Selangor, marked '*Strictly Private and Confidential and to be opened by the Addressee only.*'

All information received will be treated with the strictest confidence unless required to be declared under the law.