

CODE OF BUSINESS ETHICS

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1. INTRODUCTION

This Code is a statement of Astro's shared values that helps us conduct our business openly, honestly, and ethically. It outlines the principles and best practices that we must follow in our engagements with customers, colleagues, suppliers, shareholders and other external third parties.

Though it does not offer an answer for every situation, it does provide comprehensive guidance on how to do the right thing across the business.

I encourage each and every one of you to read this Code and apply its principles and best practices in your work, to always use good judgment, and to seek guidance if you need additional support.

EUAN SMITH
Group Chief Executive Officer



2. THE COMPANY AND US

INTRODUCTION:

If we are responsible and respectful with each other, with our customers and with our business partners then we will contribute to Astro's success. As Employees, we must ensure that illegal and unethical acts, such as bribery and corruption, do not occur within the Company. The consequences of committing acts are severe, both personally for the individual but also for the Company. So, it is important to be able to both identify the red flags that may indicate that such acts may be taking place and also to know what preventative measures you can be taking to minimize the risk of such acts ever taking place.



2. THE COMPANY AND US

(A) COMPLIANCE POLICIES AND PROCEDURES

PRINCIPLES:

- All Employees should strictly adhere to the Company's policies and procedures, including this Code of Business Ethics.
- Failure to do so may result in misconduct and severe disciplinary action being taken.
- As leaders in the Company, Managers have an added responsibility to lead in accordance with the policies and procedures.
- If any Employee has any queries regarding the policies and procedures, then they should raise such queries with their Manager.

QUESTIONS & ANSWERS:

Q: Why is this Code of Business Ethics important?

A: Because we all have a responsibility to act with honesty and integrity. By working together, we can act as the first line of defence to ensure that corruption, discrimination and accidents in the workplace do not take place.

Q: What are the benefits to you, the Company, our customers and the community from doing the right thing?

A: By doing the right thing, we can deliver our best work, we can keep being creative, we will enjoy where we work and we can provide our customers with the best experience. By complying with the Company's policies and procedures, we can all work efficiently and effectively, ensuring that the Company achieves its business objectives in a timely and proper manner.

Q: How does this Code of Business Ethics fit in with the other policies and processes?

A: This Code is just one of several policy documents that make up the compliance framework at Astro. So, please also read the other policy documents available on the Astro Intranet, including: the Finance and Human Capital Guidelines, the Procurement Manual, the Whistleblowing Policy, and the Astro Anti-Corruption Framework.

Q: What steps can Managers in particular take to ensure that effective systems and controls are in place?

A:

- Assign appropriate authority and responsibility to individuals in their teams.
- Ensure that proper authorisations are given for transactions.
- Maintain accurate and adequate records and documentation.
- Limit access to confidential assets and information so that it is shared on a need-to-know basis.
- Where feasible, obtain independent verifications and approvals.
- Ensure that there is an adequate separation of duties to avoid any conflicts of interest.
- Always be alert for any indication of fraud, misappropriation and other irregularities.

2. THE COMPANY AND US

(B) FRAUD



PRINCIPLES:

- All Employees have a responsibility to act honestly and not to commit any fraud or engage in any fraudulent activities.
- Any Employee who is found to have committed fraud will be subject to disciplinary action and/or legal action.
- Consult Astro's Anti-Corruption Framework document to understand more about what constitutes fraud and the steps that you should take to prevent fraud occurring and what you should do if you believe that an act of fraud has occurred.

QUESTIONS & ANSWERS:

Q: *What do we mean by 'fraud'?*

A:

- Soliciting or receiving any form of bribe, kickbacks or gratuity to secure any deal or to obtain any favourable terms or treatment.
- An intention to conceal an action where that action is wrongful and/or illegal.
- To falsely or omit information in order to cover up a wrongful or illegal act or to gain a benefit.

Q: *What actions constitute fraud?*

A: Examples include the following – this is not an exhaustive list and there are other acts that will be deemed inappropriate:

- Submitting forged documents, contracts or certificates to the Company.
- Profiteering as a result of insider knowledge of Company activities.
- Forgery or alteration of any document or account belonging to the Company.
- Misappropriation of funds, supplies, or other assets.
- Impropropriety in the handling or reporting of money or financial transactions.
- Misappropriating monies for personal benefit.
- Disclosing confidential and proprietary information to outside parties.
- Providing false information to HR.
- Altering sales numbers in order to give the appearance of better performance.
- Destruction, removal or inappropriate use of records, furniture, fixtures and equipment.
- Misrepresenting the time worked, misstating information in Company books.

2. THE COMPANY AND US

Q: What activities are 'red flags' that you, as an Employee, should be looking out for?

A:

- An invoice is received from a supplier that appears to be non-standard or customized.
- A supplier insists on the use of side letters or refuses to put agreed terms in writing, in particular in relation to payments.
- The Company has been invoiced for a commission or fee payment that appears large given the service stated to have been provided.
- Sales figures are overstated to receive additional incentives.
- Cash subscriptions are handled in a manner that is inconsistent with Company policies.
- Company supplies are used to perform a service for a third party without informing the Company of the service being provided.

Q: What questions can you ask yourself when having difficulty in determining whether an act is inappropriate?

A:

- Is the act legal and consistent with the Company's policies?
- How will the act affect the Company as a whole?
- If you had committed the act, would you feel bad?
- What is your Manager's view? If in doubt, seek the advice of the Manager or anyone of a high rank.



Q: What do you do if you suspect fraud?

A:

- DO NOT** discuss the issues with anyone else at Astro.
- DO NOT** take matters into your own hands and try to resolve the problem yourself.
- DO NOT** alert the people you suspect of misconduct or wrongdoing that you plan to raise your concerns.
- DO NOT** discuss the issue or your suspicions with anyone outside the Company.

There are three ways that you can raise concerns:

- Call or send an **SMS** to the **Whistleblowing Hotline: 019-6002258**
(Operating Hours: 9am-6pm)
- Send an email to: whistleblowingline@astro.com.my
- Send a letter to the Head of Corporate Assurance and the Chairman of the Audit and Risk Committee.

Q: What happens if you report fraud?

A:

- The matter will be investigated fully, fairly and quickly.
- The length and scope of the investigation will depend on the subject matter of the report made.
- As far as appropriate and practicable, you will be kept informed about the progress of the investigation. However, this may not be possible for reasons of confidentiality or to protect the conduct of any investigation.

2. THE COMPANY AND US

Q: What steps can you take to minimise fraud occurring?

A:

- Maintain accurate and adequate records and documentation.
- Limit access to confidential information on a need-to-know basis.
- Ensure that there is an adequate segregation of duties and avoiding any conflict of interest.
- Assign appropriate responsibility to the right individuals.
- If unsure about any policies or procedures, escalate your concerns to your Manager and/or the Compliance Division.



(C) CONFLICTS OF INTEREST

PRINCIPLES:

- Employees should not be involved or engage in any activity which interferes with the proper performance of their duties or obligations to the Company, whether such activities are related to the Company's business or not.
- Where an Employee is engaged to undertake freelance assignments for the Company that do not constitute part of their normal job responsibilities, then they should abide by the Company's 'Freelance Engagement Policy' or any other relevant policies.
- No Employee shall be engaged in any way or accept or perform any work for any other company, firm or organization (whether as an Employee, executive, director, partner, advisor, agent, Manager or consultant) without the prior written approval of the Company.
- Any Employee who has a financial interest in or owns (either directly or indirectly through their family) shares or other forms of beneficial interest in companies, firms or sole proprietorships that are competitors, suppliers or customers of the Company is required to disclose this interest to the Company and obtain consent in writing prior to entering into any transaction with such entity.
- If an Employee is asked as part of their duties for the Company to become a nominee director of a subsidiary of the Company or another company in which the Company has shareholding interests then such appointment will be subject to such guidelines as approved by the Nomination, Remuneration and Corporate Governance Committee (NRCGC).

2. THE COMPANY AND US

QUESTIONS & ANSWERS:

Q: What is a 'conflict of interest' and when might a conflict occur?

A: A conflict of interest occurs when an individual's personal interests interfere in any way – or even appear to interfere – with the interests of the Company as a whole. Some examples would include the following:

- Owning a material interest in or be involved with any of our suppliers, customers or competitors.
- Taking on an outside business activity that detracts from your ability to devote time and attention to work at Astro.
- Using corporate assets, confidential information or your position at Astro for personal gain.
- Acting as a broker or intermediary for someone else's benefit in a transaction that involves or affects Astro.
- Reviewing or influencing the salary or benefits of any of your family or someone in a relationship with your family.

Q: When and how must you disclose a potential conflict of interest because you are engaged in some way with another company, firm or organization?

A:

- An Employee must notify the Company immediately by writing to the Compliance Division upon taking up a new position and/or becoming aware of a conflict.
- Employees must then also periodically declare any conflicts of interest according to the scheduled declaration process.
- An Employee must make a full and accurate disclosure of the details and extent of the interest (i.e. details of all persons connected with him/her, amount of profit to be derived or the percentage of equity control) and other material facts and circumstances.

Q: What is the approval process if you are seeking to perform any work for or be engaged in any way with another company, firm or organization?

A: You must seek the prior approval from the Company as follows:

- For members of the Executive Committee (ExCo), prior notification must be given to the Company Secretary and approval must be obtained in advance from the NRCGC and/or the Company's board of directors (the Board).
- For all Employees at Senior Vice President (SVP) and Vice President (VP) job grade, approval must be obtained from the Executive Committee (ExCo) (based on the recommendation from the Compliance Division).
- For all Employees below VP job grade, approval must be obtained from the Compliance Division.
- The Compliance Division shall compile and present to the NRCGC and the Board on an annual basis a list of the SVPs and VPs who have had their appointment by an external organization approved by the ExCo in the applicable year.



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Q: When reviewing a request by an Employee to perform work for or be engaged with another company, firm or organization, what factors may the ExCo and the Compliance Division take into account?

A: The ExCo and the Compliance Division may consider, among others, the following:

- The amount of time that the Employee must dedicate to the other role.
- Whether the Employee's activities are related to the Company's business or not.
- The quantum of fees that the Employee will receive for such other role.
- The nature and size of the organization, for example if it is a family-owned entity, a small private entity, a listed company, a foundation, or NGO.

Q: What are the guidelines that apply for the appointment of an Employee as a nominee director?

A:

- Only the Group Chief Executive Officer of the Company shall have the power to select, nominate and appoint an Employee as a nominee director of a subsidiary or investee company.
- Only Employees at the Senior Vice President and Vice President job grade can be appointed as a nominee director.
- Unless agreed otherwise by the NRCGC, any remuneration payable to the Employee in respect of their role as nominee director shall accrue to the Company and not the Employee.
- Employees appointed as nominee directors shall consult and comply with the 'Guidelines for Nominee Directors' as provided by the Company Secretary, noting that in addition to their fiduciary duties to the subsidiary or investee company as a director, they are also expected to take into consideration the Company's view as to where the interests of the subsidiary or investee company lie, and balance the Company's legitimate interest as a stakeholder.
- Unless otherwise approved by the NRCGC, no Employee should take on more than three nominee directorships on behalf of the Company at any one time.





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(D) CONFIDENTIAL AND SENSITIVE INFORMATION

PRINCIPLES:

- You should not disclose any confidential and proprietary information to anyone outside of the Company, including family and friends, unless officially authorised to do so by the Company.
- You must ensure honest and accurate recording and reporting of all information on the company's records to avoid any misrepresentation or disclosure of misleading information.
- You must not in any way cover up or misrepresent the true nature of a record or transaction.
- You must not commit 'insider trading' by dealing in any of the securities of the Company at any time that you are in possession of information which is likely, upon publication, to affect the market price or trading of those securities.
- You must protect the intellectual property rights of the Company, those of others and at the same time ensure compliance with applicable laws and regulations.
- You must protect and maintain the privacy and integrity of our customers' personal data as appropriate.

QUESTIONS & ANSWERS:

(1) Confidentiality

Q: What represents confidential information?

A: If in doubt, make the assumption that any information you handle in your role is confidential. You should check with your Manager if you are not certain. Confidential information can include anything from financial forecasts to Employee and customer information, decisions or plans made to processes or methods of working.

Q: Who can you disclose confidential information to?

A:

- You should not disclose confidential information to anyone outside of the Company unless:
 - (1) you have received authorisation from the Company to do so and
 - (2) a non-disclosure agreement has been entered into with the recipient. If you are in doubt, seek clarification or proper authorisation from your Manager prior to distributing any confidential, proprietary or sensitive information.
- There will also be confidential information that can only be accessed by certain people within the Company. Make sure in advance that the recipient is authorised to receive the information.



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Q: What steps should you be taking to protect confidential information and to store information in a correct manner?

A:

- Properly classify and label the information to ensure it is only disseminated to the correct person.
- Ensure transactions are complete and recorded accurately and promptly, in particular if you are involved in the financial recording processes that in any way affect the integrity and accuracy of financial statements and internal management reports.
- Avoid any fabrication, exaggeration, guesswork to ensure all records and communications are clear, complete and accurate.

(2) Insider Trading

Q: What is meant by 'insider trading'?

A: It means the use or disclosure of price sensitive information that is not available to the public for personal benefit or for the benefit of others. Price sensitive information can take many forms and includes information which may influence an investor's decision to buy, sell or hold securities in the Company.

Q: What are the consequences of insider trading?

A: Insider trading is illegal. So anyone found guilty of the criminal offence of insider trading could find themselves subject to imprisonment and/or substantial fines. Any Employee who is found to have committed insider trading will be subject to disciplinary action and/or legal action.

(3) Intellectual Property Rights

Q: What do we mean by 'intellectual property rights'?

A: Basically we are referring to the ownership rights in artistic works. So this includes the rights in anything that is created on behalf of the Company, such as content, logos, taglines, processes, innovations, names and inventions.

Q: Why is it important to protect intellectual property rights?

A: This is because these rights are valuable and are the product of significant investment of time and resources. As a content creator, we must ensure that everything is done to secure and enhance that value. Also, as a content licensee and a major player in the Malaysian creative industry, we must do everything we can to support other content creators by protecting their content and using it within the parameters of the rights we have been granted.

Q: What should you be doing to help protect the intellectual property rights of the Company and of third parties?

A:

- Remember that any intellectual property created by Employees in the performance of their job responsibilities belongs to the Company.
- Report any unauthorised use of the Company's intellectual property rights to your Manager.

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- Be sure to obtain permission in advance to use a third party's trademark or other intellectual property. For example, if you see an image or video on social media, you must seek the owner's prior permission if you wish to use it on behalf of the Company.
- Where the Company is using a third party's intellectual property, ensure that you respect and comply with any conditions of use required by the third party, including using within the terms of any license agreement.

(4) Personal Data

Q: How do you ensure that the privacy and integrity of a customer's personal data is maintained?

A: Please consult the Company's Personal Data Protection Policy for more information. No Employee should use a customer's personal data for their own or anyone else's use or disclose the information to any unaffiliated third parties, unless authorised to do so by the relevant authority or by law.



(E) ASTRO ASSETS AND PROPERTIES

PRINCIPLES:

- All Employees have a responsibility to use all reasonable care to safeguard the Company's property and assets to avoid any loss, damage, misuse, illegal use or theft.
- The Company provides internet and email access to Employees who need such access for business purposes, specifically for the purpose of increasing productivity relating to the job function of that Employee, and therefore internet access is not meant for personal activities.

QUESTIONS & ANSWERS:

Q: What is expected of Employees when using Company assets and properties?

A:

- You should not use Company property or assets for personal reasons or remove from Company premises unless you have obtained prior permission from your Manager.
- Occasional and reasonable personal use of internet and email on Company premises is acceptable during meal times, other breaks or outside scheduled working hours, provided that:
 - (1) it does not interfere with performing your work duties, and
 - (2) you do not use such network access to engage in illegal activities, personal attacks, political use, or in any other non-professional conduct or activity which will bring the Company into disrepute
- Remember that you will be liable for any loss arising out of your negligence. Any non-compliance with result in disciplinary actions being taken against you.



3. OUR COLLEAGUES AND US

INTRODUCTION:

We all owe it to each other to ensure that we work in a friendly, open and hospitable environment. By showing respect to our colleagues and behaving with honesty and integrity, we will be able to enjoy our jobs and produce great work for the Company, contributing towards a fantastic experience for our customers.



3. OUR COLLEAGUES AND US

(A) PUNCTUALITY AND TIME

PRINCIPLES:

- It is the Employee's responsibility to report to work on or before their regular or rostered starting time each workday.
- All Employees are expected to remain at work until the end of their assigned work hours.

QUESTIONS & ANSWERS:

Q: *Why is it important to show punctuality and be on time?*

A:

- Punctuality promotes professionalism, goodwill and respect.
- Good timekeeping enhances productivity and effectiveness.
- You should therefore be punctual when attending meetings, training, conferences and appointments with both internal and external customers.
- If you need to leave the workplace to attend to urgent personal matters during working hours then you need prior approval from your Manager.
- If you are arranging a meeting, appointment or activity, be sure to do so with reasonable advance notice to enable sufficient preparation.



(B) RESPECT AND PROFESSIONALISM

PRINCIPLES:

- We should treat our colleagues with the same level of professionalism, dignity and respect that we do for external third parties such as our customers.

QUESTIONS & ANSWERS:

Q: *What are the behaviours expected of us in the workplace?*

A:

- We should conduct ourselves in a professional manner, demonstrating the highest regard for one another.
- We must avoid any language or behaviour that intimidates or offends others.

3. OUR COLLEAGUES AND US

- There is zero tolerance for any abuse of power and harassment, whether verbal, physical or visual, which creates an offensive, hostile or intimidating working environment or impacts work performance.
- If you believe have been the subject of harassment, whether by another Employee, subordinate or superior, then you should promptly report the incident to your Manager and to Human Capital. You can be assured that any such report will be handled in confidence and appropriate actions taken as detailed in the Harassment Policy.



(C) WORK ENVIRONMENT

PRINCIPLES:

- We should all work together to foster or nurture a friendly and non-hostile environment that promotes good relations between one another.

QUESTIONS & ANSWERS:

Q: *What actions can we take to foster and nurture a work environment that promotes good relations between us?*

A:

- Cooperate with one another to achieve shared goals and objectives, clearly and mutually defining what those goals are.
- Have pride in what we do and enjoy working with the people we deal with.
- Be open, approachable, building friendly, fair and professional relationships.
- Be committed to providing quality service.
- Allow opportunities to make suggestions, share experiences, seek the opinions of others in order to continuously improve work methods and the products and services for customers.

Q: *What actions can Managers in particular take to help create a friendly and non-hostile environment?*

A:

- They should manage in the most efficient and effective manner, clearly and mutually defining the right work objectives.
- Evaluate results fairly and consistently, providing regular constructive feedback and delegating authority where appropriate.
- Recognise and celebrate achievements, while also dealing with potential performance issues and addressing repeated failures.
- Encourage constructive thinking and the expression of views and opinions to improve work methods.
- Encourage cross-divisional exchanges of view to improve workflow and operational procedures.



4. OUR SUPPLIERS AND US

INTRODUCTION:

We need to be sure that we act with honesty, integrity and transparency with all our suppliers and vendors. Similarly, we should not be doing business with any supplier that cannot also adhere to these important principles. We cannot put Astro at risk of being party to any illegal acts, even if indirectly or without any express knowledge. For this reason, we must adhere to a number of checks and balances to ensure we only deal with suppliers and vendors that do the right thing.

4. OUR SUPPLIERS AND US



(A) ESTABLISHING BUSINESS RELATIONSHIPS

PRINCIPLES:

- We must treat suppliers competently and fairly while at the same time ensuring that we do not take any actions or make any omissions that are likely to harm the Company's reputation and business interests.

QUESTIONS & ANSWERS:

Q: *What steps can we take to safeguard the Company's reputation?*

A:

- You should only make a commitment or execute a document on behalf of the Company where you are specifically authorised to do so. If in doubt, check with your Manager on the limits of authority that have been delegated to you.
- Do not speak on behalf of the Company without property authority.
- Never make promises or commitments to third parties that we cannot fulfil.
- Provide timely and quality service, dealing with suppliers competently and fairly.
- Supply external parties with relevant and accurate information in a timely manner, in a form and of a quality that is appropriate for them to discharge their duties.
- Avoid doing business with any parties who are likely to harm the Company's reputation and business interest.
- Be sure to comply with all applicable laws, regulations and rules that apply in every country that the Company operates. If in doubt about the legality of a matter, then consult immediately with the Company's Legal department.





4. OUR SUPPLIERS AND US

(B) ASTRO'S NO GIFTS POLICY

PRINCIPLES:

- Astro has a 'No Gifts' policy. This simply means that you are not allowed to give or receive gifts.
- You should not therefore make payments or provide gifts or entertainment to third parties to solicit, induce or secure sales or obtain favourable terms or treatment.
- Any assistance or entertainment given to third parties by us should not compromise, or even appear to compromise, our integrity and business judgement.

QUESTIONS & ANSWERS:

Q: Why do we have a 'No Gifts' policy?

A: Because giving or receiving gifts may influence your judgement and decision making. It is not always clear what the intentions and motives are for the gift. While the intentions and motives may well be genuine and innocent, you cannot always be sure. We all need to act with complete transparency and to ensure that there is no misunderstanding or appearance of wrongdoing. Therefore, we simply say that no gifts are allowed.

Q: What actions should you take if you are offered a gift from a business associate?

A: Please consult the Astro Anti-Corruption Framework document for detailed information about Astro's 'No Gift's policy. In summary you must politely refuse or return the gift and report the incident to your head of department or Manager. You should also inform the Compliance division. If it is not possible to return or refuse the gift, for example if you believe that your refusal will likely cause offence, then you must:

- (1) RECORD THE GIFT, by completing the e-Gifts Declaration Form
- (2) REPORT THE GIFT, by letting your head of department or Manager know. They will complete their Gifts Log and decide if the gift falls within any limited exceptions. The Compliance division must then give final approval.

Q: Are there any situations when it might be permissible to give gifts?

A: Again, for more detailed information on this, please consult the Astro Anti-Corruption Framework document. However there are the following limited exceptions for the giving of gifts by Employees to business associates or other people engaging with the Company:

- If the gift is worth less than RM250 per item, it features the Company logo or brand and is part of a marketing or promotional campaign.
- If the gift is exchanged at a company to company level. For example as part of an official event or launch.

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- If the gift is at an official function or public event as an appreciation for attendance. For example a pen or a lanyard at a conference.
- If the gift is part of the Company's corporate social responsibility programme.
- If the gift is offered because of a festivity or occasion and is worth less than RM250. For example as part of Chinese New Year celebrations.

If you want to make a gift that does not fall within these exceptions then you must complete a Gift Approval Form and seek approval from the Compliance Division if valued under RM500 and from the Group CFO if valued over RM500.

Q: What might constitute a gift?

A: The definition of what constitutes a gift should be interpreted broadly. It can include tickets to sporting and cultural events, discounts not available to the general public, cash, art objects and any other merchandise or services in whatever manner or form. If you are still uncertain, you should seek clarification from your Manager.



Q: When is giving or receiving entertainment or meals permitted?

A: You can offer entertainment and meals to business associates provided that:

- It is business related
- It is not for spouses and non-business guests, and
- The cost does not exceed the thresholds set out in Astro's Anti-Corruption Framework document

If you wish to accept an offer of entertainment or a meal then you must comply with the following rules:

- You should not accept when the other party is engaged in a tender or bidding exercise or is in contract negotiations with Astro.
- You should not accept hospitality frequently from the same party.
- You should not accept anything that may be perceived as lavish or excessive or may tarnish Astro's reputation, including of course anything illegal.

4. OUR SUPPLIERS AND US

(C) PURCHASING AND PROCUREMENT



PRINCIPLES:

- You should only make procurement and purchasing decisions based on the Company's best interest, taking into consideration price, delivery, quality and product or service suitability.

QUESTIONS & ANSWERS:

Q: *What considerations should be taken into account when selecting a supplier?*

A: All Employees should comply with the Procurement/Purchasing and Tender policies for procurement of goods and services. Considerations should include:

- Do not select a product or supplier solely based on lowest prices, especially if it compromises quality and suitability.
- Treat all suppliers equally and afford all the same information at the same time.
- Ensure that no confidential information is disclosed during the procurement process without a non-disclosure agreement in place.
- Approach more than one supplier or bidder where possible.
- Take into account other commercial and operational considerations as advised by the relevant Business Unit.
- Ensure adequate checks and balances are put in place as part of the decision-making process to ensure that an objective, unbiased assessment is made.

Q: *What should be included in the procurement or purchasing agreement to ensure that the Company's interests are protected?*

A: At a minimum, any agreement should include the following:

- Detailed documentation of the services or products to be provided.
- The basis for earning payment.
- The applicable rate of fee, based on deliverable milestones that can be independently verified.





4. OUR SUPPLIERS AND US

(D) MAKING COMMITMENTS ON BEHALF OF THE COMPANY

PRINCIPLES:

- All monetary commitments must be approved according to the approved 'Limits of Authority'.
- Employees must handle cash in the prescribed and authorised manner or purpose and cannot use, divert or conduct any other unauthorised transactions.

QUESTIONS & ANSWERS:

Q: *I already have approval in the budget for procurement of products/services. Can I proceed?*

A: No, authorisation and approval of the budget or operating plan is not, on its own, authorisation to spend the money. Approval to incur the expenditure is still required even though it is budgeted for.

Q: *As well as acting within the limit of my authority, what other restrictions on approvals should I be aware of?*

A: No individual is allowed to:

- Approve his or her own claims or expenses for payment.
- Approve a requisition, place an order, receive goods or approve an invoice for payment all by him or herself.
- Break down the total value of the procurement into multiple purchase requisitions to evade limits established by management, including approval authorities and competitive bidding.

Q: *Can I delegate my 'Limits of Authority'?*

A: Only to a line subordinate in the functional area that you are responsible for, provided that:

- The delegation is time and task specific, with approval of your Manager.
- The delegation is documented, communicated and agreed by the relevant parties.
- You are still accountable for the performance of the delegated task.
- The line subordinate who has been delegated the authority is not allowed to further delegate or sub-delegate the authority given to them.

Q: *Which individuals are not allowed to make commitments on behalf of the Company?*

A: The following are not allowed to make any commitments on behalf of the Company, unless written permission is given and it is in their ordinary course of work:

- An Employee who is serving their notice period, prior to the end employment
- Consultants
- Part-time / temporary / freelancers
- Agents
- An Employee who is under investigation or suspension



COMMITMENT

Note that the above list is not exhaustive and may include Employees who are the subject matter of an investigation or as advised by Human Capital division.



4. OUR SUPPLIERS AND US

(E) MONEY LAUNDERING

PRINCIPLES:

- You must carry out the necessary due diligence and onboarding processes prior to engaging any supplier.
- Remain vigilant and proactive in identifying any situations that could involve money laundering.

QUESTIONS & ANSWERS:

Q: *What are some examples of money laundering that you need to look out for?*

A: There are many ways to launder money, including making payments to Astro using illegal cash, layering proceeds through wire transfers and conversion of cash to financial instruments, and making wealth from illegal activity look legitimate by falsifying invoices or over-billing. Prepaid credit cards are also something typically used for these schemes that you should consider rejecting as a method of payment.



Q: *What steps can you take to mitigate the risk of money laundering?*

A: There are a number of things you need to ask to ensure that a supplier or customer is legitimate or if it alerts you to potential money laundering:

- Ask questions of the supplier or a customer about the source and amount of the money being transferred to the Company. Vague answers are a red flag.
- Follow the onboarding process for any supplier which will include due diligence of the supplier's financial status. Ask questions about assets that may have appeared in the financials they share with you.
- Be wary of any cash payments – raise queries about why the payment is being made in cash and suggest alternative methods of payment.
- Do not unnecessarily disclose or share any information about yourself or Astro to these third parties.
- Be watchful and use common sense. Be aware of the latest money laundering schemes.
- Be sure to help other colleagues and report any suspicious activity. Vigilance will shut down many of these schemes.



5. OUR STAKEHOLDERS AND US

INTRODUCTION:

We should be aware that the reputation of the Company depends on all of us acting responsibly and respectfully with any external parties that we deal with. Any instances where we do not demonstrate the necessary integrity and professionalism could have wider consequences for how the Company is perceived. We must maintain the trust and respect of all third parties we interact with to ensure that we can pursue the Company's best interest.



5. OUR STAKEHOLDERS AND US

(A) CUSTOMERS

PRINCIPLES:

- The Company recognises that customer satisfaction is of primary importance.
- All customers should be treated professionally and with a high level of customer service to address any dissatisfaction or complaints.

QUESTIONS & ANSWERS:

Q: *What are the key principles to consider when creating marketing and advertising messages?*

A:

- All of our marketing and advertising messages must be accurate and truthful.
- Any disclosure of marketing information must be cleared by the appropriate channels.
- Deliberately misleading messages, omissions of important facts, or false claims about our offerings or that of our competitors are not acceptable.
- We should obtain customer feedback on an ongoing basis to identify areas for improvement.



(B) SHAREHOLDERS AND INVESTORS

PRINCIPLES:

- The Company should conduct its operations in accordance with intentionally accepted principles of good corporate governance and generally accepted accounting practices.

QUESTIONS & ANSWERS:

Q: *How should communications with shareholders and investors be handled?*

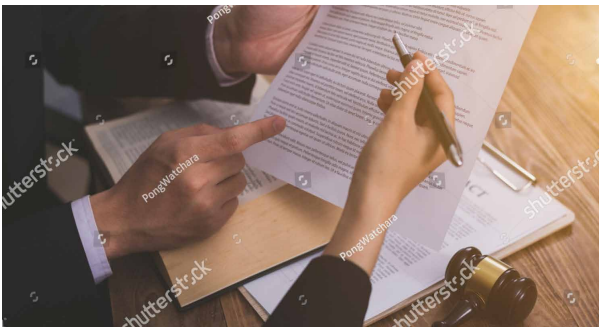
A:

- All queries and requests from shareholders and investors should be forwarded to the Investor Relations Department to ensure a professional and consistent approach.
- Shareholders have a right to obtain on a timely and regular basis all information on the Company, its activities and its management (including annual reports, quarterly announcements and all information likely to impact its share price).
- Only those Employees authorised to do so should communicate with shareholders. They should at all times provide all shareholders and potential investors with fair, accurate, timely, objective,

5. OUR STAKEHOLDERS AND US

understandable, regular and reliable information. This information may cover the Company's activities, policies, structure, financial situation, performance, achievements and prospects.

- Any communication should be delivered using a suitable media so as to inform in a prompt and uniform manner.
- A communications policy should be maintained to facilitate effective communication at all times with shareholders and investors.
- We should not however be disclosing information that may compromise the Company's competitive position or result in a breach of any non-disclosure obligations.



(C) REGULATORS AND GOVERNMENT AGENCIES

PRINCIPLES:

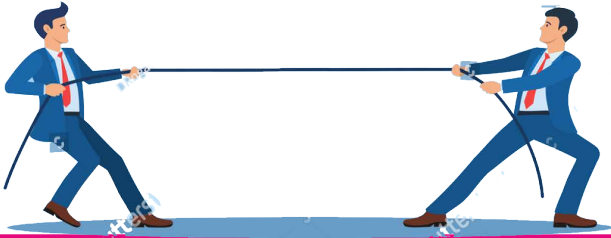
- All Employees dealing with regulators and/or government officials are expected to know, understand and comply with all applicable laws, regulations, rules, directives and guidelines in every country in which the Company does business.
- You should never, whether directly or indirectly, offer to make any unlawful payments or benefits to government officials and regulators.

QUESTIONS & ANSWERS:

Q: *What should be considered when dealing with requests from regulators and government agencies?*

A:

- All requests from regulators and government agencies or officials, whether routine or non-routine, should be forwarded to the Regulatory team for further action.
- You should consult with the Company's Legal department if in any doubt as to the legality of any matter.
- The prohibition on any unlawful payments or benefits to government officials and regulators applies to both Employees and agents of the Company (such as service agents and dealers) irrespective of geographical location.
- Where we use agents to deal with government officials on our behalf then we should ensure the agents are reputable and they agree in writing to comply with the Company's policies.



5. OUR STAKEHOLDERS AND US

(D) COMPETITORS

PRINCIPLES:

- We should sell the Company's products and services fairly and honestly, stressing their benefit, quality and value.
- The Company will always compete aggressively but should treat its competitors fairly.

QUESTIONS & ANSWERS:

Q: *How should we balance competing in the market to ensure the Company is successful while also safeguarding the Company's reputation?*

A:

- Do not criticise or provide misleading information about our competitors. Only use comparative advertising when comparing our products and services against the competitor's own statements about their products and services.
- Never obtain information about a competitor or trade secrets through improper means or without the owner's consent.
- Avoid unfair methods of competition and any unfair or deceptive acts or practices which may affect fair competition.
- Be sure to comply with anti-trust and unfair competition laws, regulations, rules, directives and guidelines.



(E) MEDIA

PRINCIPLES:

- No Employee should speak on behalf of the Company, whether to the media or indeed any third party, without proper authority or delegation.

QUESTIONS & ANSWERS:

Q: *What should I do if I receive a query from the media?*

A: All queries and requests from the media should be forwarded to the Communications Division to ensure a professional and consistent approach in addressing such matters.





5. OUR STAKEHOLDERS AND US

(F) POLITICS

PRINCIPLES:

- Use of the Company's name to endorse a political activity or event is not permitted.
- You shall not engage in any corporate political activity or make any political contribution on behalf of the Company or using the Company's name without first obtaining written consent from the Group Chief Executive Officer.

QUESTIONS & ANSWERS:

Q: *How should we engage with politics, political parties, non-governmental organisations (NGOs) and non-profit organisations (NPOs)?*

A:

- You should not promote any political views, including posting or distributing materials, on or around Astro properties or in your capacity as an Employee. You may not indicate or suggest you speak for Astro or that Astro supports your political views.
- For certain Employees in roles that are high profile, public-facing or may require political neutrality, you may be requested by the Company to refrain from expressing any political views in public if there is a reasonable belief that doing so may have a detrimental impact upon your effectiveness to carry out your role. Impartiality is a particular concern for those working in News and Current Affairs and the Content Division and this section should be read in conjunction with the Company's Social Media Policy.
- You should not engage in any corporate political activities on behalf of the Company without first obtaining written consent from the Group Chief Executive Officer. This includes making any political contribution on behalf of the Company or using the Company's name, cash, property, equipment or services for the support of political parties, initiatives, activities, events committees or candidates.
- Any contributions to NGOs and NPOs or endorsements of charitable organisations or events on behalf of the Company or using the Company's name require the prior written approval of the Group Chief Executive Officer.
- Otherwise, the Company does not prohibit an Employee from participating in civil, religious, charitable, educational, cultural, recreational or similar activities provided that the time devoted to such activities does not interfere with the performance of their duties and their involvement does not reflect unfavourably on the Company or be in conflict with the interest of the Company.



6. CONCLUSION

This Code is designed to help guide ethical decisions and actions. Please use them in your work and seek additional guidance as needed.

Where relevant this Code should be read in conjunction with the relevant policies and procedures which are currently in place.

In cases of overseas subsidiaries where such policies do not exist, the Company's policy will apply.

If you are faced with an uncertain situation, we expect you to seek help by informing your Manager before taking action.

DEFINITIONS

ASTRO or the Company	ASTRO MALAYSIA HOLDINGS BERHAD and its subsidiaries
Manager	An individual within the Company to whom an Employee reports to, i.e. supervisor, line leader, team leader etc
Employee	A person who is hired under a contract of service for a wage, salary, fee or payment to perform work for the Company