

I KNOW	How I should conduct myself and my job.
Who Does This Apply to and Cover?	 Directors and employees of Maxis Berhad and its subsidiaries. All 3rd party employees, contractors, consultants and/or personnel positioned in Maxis' premises and acting on Maxis's behalf. All parties or entities doing business with Maxis.
Who's Responsible for What?	 If you are a new employee you must read and acknowledge this Code in our system. You must also acknowledge this Code or any amendments and take part in any acknowledgement process as and when required after the initial acknowledgement. If you are a manager and/or managing/engaging 3rd party, contractors, consultants and/or personnel positioned in Maxis' premises, you have the additional responsibility of leading and being a positive example of this Code to your employees & ensuring all your 3rd party, contractors, consultants and/or personnel positioned in Maxis' premises comply to the Code too. You must also be aware of, and report any unethical or illegal business practices. You must follow and observe this Code when you are working with Maxis. In some instances (such as confidentiality obligations), you are also bound by it after you have left Maxis. You must also observe all laws and regulations that govern all of the matters covered in this Code. This Code is in compliant with all such laws, but in case of doubt, such laws shall override any of the provisions or clauses of this Code.
Non-Discriminatory and Safe Work Environment Create a positive, healthy working environment, and use common sense where there is no clear guidance.	 You cannot discriminate based on race, religion, gender, politics or disability. You must be fair to all, and strive to be seen as fair to all. You must help create and maintain a safe and positive working environment. You must not harass or abuse your power or intimidate or create a negative working environment. If you are not sure whether there are formal or official rules or policies on a specific case, apply good judgement and common sense and ensure a safe working environment for yourself and those around you.
Ethics Hotline (Whistle Blowing Mechanism) We encourage openness, and have an official	If you think you know of any possible violations of law or unethical conducts such as fraud, corrupt practices, misrepresentations or deliberate errors connected with our financial statements, any form of harassment or conflict between personal life and work or anything else that carries substantial risks to Maxis and/or public health or safety and security, you must report it.



channel for reporting wrong practices. Open to all employees as well as non-employees.

Your identity will be kept confidential when you raise concerns or report any violations of the Code, unless required to be declared under the law.

Ethics Hotline

Telephone: 017-200 3922 (Call or SMS)

Email : ethics@maxis.com.my
Letters : Ethics Hotline Office

Level 21, Menara Maxis, KLCC

50088 Kuala Lumpur

Alternatively, you can report to our Senior Independent Director

Email: mmokhza@maxis.com.my

Company's Assets & Properties

Take care of Company's property as if it's your own. Illegal use of it can be a criminal offence.

- If you use Company's assets and properties for personal use, it must be in reasonable amount that does not go against any specific rules or policies and must not have a negative impact on the Company, such as cost, safety, reputation or productivity nor distract you from focusing on your responsibilities.
- You cannot use Company work vehicles to carry friends and families or for non-Maxis related purposes.
- You must protect Company's assets entrusted to you from any loss, damage, misuse or theft.
- You must not store or view or download or send any materials which pornographic, sexist, racist, illegal or can create hatred or ill feelings, in nature.
- You cannot share usernames and passwords with anyone at all, nor allow access to systems through your own usernames and passwords, even if it is for work.
- You cannot duplicate copyrighted materials, copy Company's proprietary software or install unauthorized software into Company's assets.

Confidential Information

Guard and manage and make use of confidential info properly. Misuse is serious and possibly dangerous.

- You must mark all confidential info properly, keep it secure and don't share with anybody for whom it is not intended to.
- Don't share or discuss openly info not known yet to the public such as info on employees, customers, suppliers, business partners, technical info, data, knowhow and business info, marketing strategies, financial conditions and operations. These info should also not be used for personal gain.
- You must not misrepresent, falsify, amend or remove any info in the Company's records.
- You must not access, copy, distribute, share or send out any of the customers' information without authorization or through approved process.
- You must continue safeguarding Maxis confidential info even after you stop working with Maxis.



Personal Data Protection Act 2010 (PDPA)

It's the law and it says you must protect confidential info.

- You must follow the Personal Data Protection Act (2010). It's the law. You must maintain customer's rights to privacy by not accessing their info without authorization (in writing by the customer) or in accordance with Maxis' lawful purposes.
- What is personal data? It's any info that relates directly or indirectly to an individual, who is identified or identifiable from that info or from that or other info in your possession. Such info may include address, identification card number, passport number, email addresses and contact details, as well as any expression of opinions about that individual and any intentions of the data user in respect of that individual.
- PDPA shall apply to you if you:
 - 1. Possess any personal data in respect of any commercial transactions; or
 - 2. Have control over or authorize the processing of any personal data in respect of any commercial transactions; or
 - 3. Possess any customers' personal or commercial data; or
 - 4. Use Maxis' equipment for processing of customers' personal and commercial data

Insider Trading

You must be careful in buying or selling Maxis shares so as not to fall foul of insider trading laws.

- You must exercise due care when dealing, either purchasing or in the sale of shares of Maxis Berhad in view of the implications under insider trading laws.
- 'Insider Trading' is a criminal offence and is prohibited under the Securities Industry Act 1983, the Companies Act 2016 and the Listing Requirements of Bursa Malaysia Securities Berhad. Sections 183 to 198 and 201 of the Capital Markets and Services Act 2007 contain relevant provisions prohibiting insider trading.
- You are an 'insider' if you have material info not available to public, which would have an effect on the price or value of Maxis securities, and you know that info is not generally available.

Punctuality & Attendance

Time is a Company's critical resource. Don't waste it, and get approval for using Company's time for personal use.

- You must be on time to any event you are required to be part of whether working hours or meetings or external events which are part of your job.
- You must get your manager's approval before leaving your workplace for personal matters.
- If you can't report for work you must tell your manager at the first available opportunity the reason for your absence. You manager however has the right to reject your request and you'd have to report to work immediately. Managers please exercise good judgment in such instance balancing the needs of Maxis and the individuals.
- Please refer to the <u>I Know My Work Schedule and Time Off Policy</u> for more info.

My Other Business Interest / Employment

 Any dealings of family members / relatives / friends with the Company must be disclosed, regardless whether directly or through a 3rd party vendor / contractor.



If you work for Maxis you		
can't work for others		
(unless declared and		
approved)		

- You can't work in any other trade, business, employment or directorship other than your employment with Maxis, whether within or outside of working hours, without written approval obtained from Head of People & Organisation.
- You must also log a request under Other Business Interest/Employment Declaration Request in MyRemedy about any material interest in any trade, business, employment or directorship with more than 5% interest. Material interest here means having 5% or more voting shares.

Fraud & Anti-Corruption

Fraud and corruption are wrong and must be reported.

- You are responsible to detect and report fraudulent activities such as :
 - 1. Forgery or alteration of documents;
 - 2. Misappropriation, destruction or disappearance of funds, inventories, supplies or other Company's tangible or intangible assets;
 - 3. Improper handling or reporting of financial transactions;
 - 4. False, fictitious or misleading entries of reports;
 - 5. False or misleading statements to those conducting investigation of irregularities.
- Corruption is giving, receiving or promise of rewards in order to gain any commercial, contractual, regulatory or personal advantage.
- Suspected irregularities or corruptions must be reported to the Ethics Hotline immediately. Do not discuss your suspicions with anyone other than the investigation team.

My Social Media

Social media changes very fast, no hard and fast rule except applying good judgment and understanding its potential impact.

- Social media is a very fast changing area. Whilst Maxis respects your rights to freedom of speech, you must be mindful of what is OK and what is not OK to be posted on social media. If you are officially posting on behalf of Maxis, you must have been authorized to do that, and you must follow whatever procedures and policies guiding you. If it's a personal post, you must not give the impression you are posting on behalf of Maxis, and you must be aware that your comments may be associated with Maxis even if you posted it as a personal post.
- You must not publish, post, release any materials or confidential info or participate in any forums that may harm the reputation of Maxis.
- It is also not OK if such postings potentially create an unpleasant working environment within the Company.
- These requirements apply to postings done during or after working hours, regardless whether you are using your own or Company's equipment/devices.

Media

Don't deal with the media.

- If you receive any queries from the media, direct them to the Corporate Affairs Division. They are the right people to handle such matters. Don't respond unless you have been authorized to do so.
- Requests from financial analysts and shareholders should be treated the same.



My Conduct With Internal Parties

Treat others as you want to be treated.

- Treat your colleagues the same way you want to be treated. Respect is a two-way street.
- Maxis does not tolerate anyone using their ranks, seniority, race, physical size or gender to intimidate others.
- If you are a Manager then you have the added responsibility of managing your employees. You must make objective decisions and without any prejudice or discriminations.
- All of us in Maxis are responsible to monitor and ensure effective controls are implemented in their respective area of work.
- Your conduct must reflect Maxis' Values.

My Conduct With External Parties

To outsiders, you ARE Maxis!

- How you behave out there portrays the image of the Company. Therefore, you must at all times ensure business is done with the highest integrity and professionalism.
- Maxis will not condone anyone who offers, makes or demands for unlawful payments to secure sales/business. We take pride in doing business the honest way.
- If you receive any non-routine requests from government or regulatory agencies, immediately check with the relevant divisions handling the matter.
- You must get written approval from Corporate Affairs Division before making any contributions to NGOs or NPOs on behalf of Maxis.

Giving & Receiving Business Courtesies

Small gifts are OK, but there are limits.

- Any gifts or tokens must be lawful, reasonable, and do not appear to compromise business decisions.
- You don't have to declare gifts with value lower than RM250.00. But recurring low value gifts from the same business partners is no longer a business courtesy and would have to be declared.
- If you go on business travels, the costs will be picked up by Maxis. Vendor/supplier may provide, if they wish, ground transportation to enable employees to travel from hotel to business locations. You may not accept vendors or third parties paying for all or part of your trip without approval from Head of P&O.

Purchasing & Sourcing

Decide on purchase without any conflict of interest and within your authority.

- Your purchase decision must be made in the interest of the Company. You must practice equal treatment to all vendors, with due care on confidentiality, transparency and with no conflict of interest.
- Any conflict of interest through relationships, business or others must be declared to the Sourcing Department, regardless if you have access to or not to tender or procurement-related sensitive info.
- All monetary commitments on behalf of the Company must be within the Company's Limit of Authority.
- If you have tendered your resignation, you are no longer allowed to make any



	commitments on behalf of Maxis. Consultants are not allowed to make such commitments at all times.
Competitors Compete fairly. We don't take unfair advantage.	 Maxis does not tolerate anyone who steals, procures, obtains or possesses any of our competitors' proprietary or trade secrets info. If you have obtained such info by mistake, immediately consult Legal Department. As much as we want to gain competitive advantage against our competitors, we will never use illegal or unethical methods to achieve such goal. For comparative advertising, use only info obtained from competitors' own statements to compare with Maxis products.
Health, Safety & Environment (HSE) Management Everyone's responsibility to create a safe and healthy working environment.	 You must ensure a safe & healthy environment for everyone including the public & follow all related laws, Maxis policy, systems & processes that govern HSE, mainly OSHA 1994, FMA 1967, EQA 1973, OHSAS 18001, QMS 9001 (Network). You must be appropriately trained and competent in the specified areas of HSE in the work that you do. You must report any occupational incident (accident, hazard, unsafe act or condition) to your manager and HSE Team via MyRemedy. You are required to actively participate in related HSE programs. Visit the HSE Portal to review and understand the general requirements related to your work. If you are a manager and/or managing/engaging 3rd party staff, contractors, consultants and/or personnel working for Maxis, you have the additional responsibility to ensure that all comply with all the HSE requirements.
My Security Responsibility Together we can help protect each other and Maxis Assets.	 You must report any security incidents and/or any potential security related risks to your manager and Maxis Security via MyRemedy or call the Security Hotline. You must always wear and display your Maxis ID tag within Maxis premises and report any losses. Your ID tag and access into Maxis premises is for your use only and not to be shared. If you are a manager and/or managing/engaging 3rd party, contractors, consultants and/or personnel, you have the additional responsibility to ensure that all comply with all the security requirements as per this Code. Security Hotline Telephone: 03-67302020

Approver: Maxis Management Team

Owner / Administrator: Employee/Labour Relations, People & Organisation