



Our Value Creation Theme 5:

Embedding Responsible Business Practices

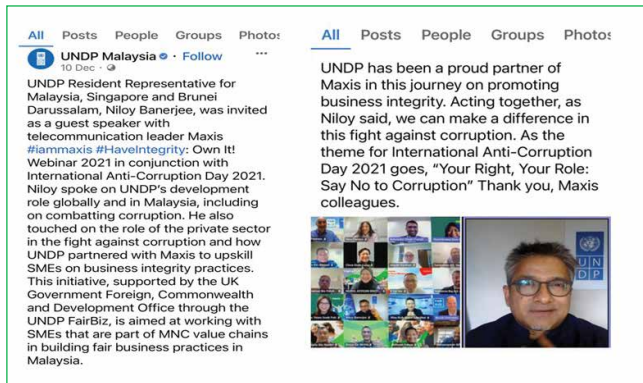
Mapping against SDGs



OUR GOVERNANCE

Strengthened our ethical business culture through robust integrity governance and educational programmes

Maxis has a zero-tolerance policy against bribery and corruption and through the Integrity & Governance Unit (IGU) has implemented various initiatives to ensure ethics and compliance is observed throughout the value chain. IGU is an independent unit that reports directly to the Board of Directors through ARC. For administrative matters, IGU reports to CFSO. The role of the IGU is to ensure the effectiveness and implementation of the following four (4) core functions within Maxis, namely: (1) Complaints Management; (2) Detection & Verification; (3) Integrity Strengthening; and (4) Governance.



- IGU’s recommendation to proceed with the submission of Maxis’ application for the ISO 37001:2016 Anti-Bribery Management System (ABMS) Certification, respectively.

This endorsement was granted following the completion of the pre-assessment of Maxis’ ABMS Certification that was conducted by SIRIM in April 2021 and Company-wide corruption and bribery risk assessment that was conducted and completed in mid-October 2021. Additionally, policies relating to Sponsorship & Endorsement and Hospitality & Entertainment Policies had also been revised in October 2021. A process was also established to formalise the tracking mechanism and management of relevant activities under these policies.

In adherence to the Sponsorship & Endorsement Policy and Guidelines that is under the purview of MABC Manual, Maxis prohibits sponsoring initiatives which have an alignment to any political groups. Additionally, as part of our CSR and Non-CSR Donations and Contributions Policy, Maxis also recognises that providing donations and contributions can pose a bribery risk as it involves payments to a third party without tangible returns and this may be used as a route for bribery. Hence, all CSR and non-CSR contributions made to the Government require the final approval of the Government and Regulatory Affairs Committee (GRAC).

Maxis has established appropriate culture, oversight and autonomy to anti-corruption and compliance. Strong commitment from the Board, Board Committees, CEO, MMT and management and a clearly articulated Maxis Integrity & Compliance Framework (MICF) reflect the aspiration towards leading exemplary compliance of Environmental, Social and Governance (ESG) principles for sustainability of good corporate governance.

Any conduct which is non-compliant or in violation of the Maxis Anti-Bribery and Corruption (MABC) policy will be taken seriously and are subject to disciplinary actions. Where non-compliance or violation of this Policy, or a complaint, or escalation is received, due inquiry process will be carried out by the Company.

Maxis has also endorsed the implementation of:

- the MICF;
- the Anti-Money Laundering and Counter Financing of Terrorism (AML/CFT) structure for Maxis Collections Sdn. Bhd. (MCSB); and

During the reporting year, an Integrity Vetting System (eSTK) screening was conducted by the Malaysian Anti-Corruption Commission on the Board of Directors, including the Chairman, and was also extended to the Chief Executive Officer, Senior Management and officers



designated for critical and strategic positions, including selected third parties who were thoroughly vetted and found to be of high integrity.

As part of Maxis' continuous journey to strengthen its culture of integrity and business ethics within the organisation, the Board of Directors and Senior Management fully supported the implementation of the Maxis Integrity Corporate Advocacy Programme (MICAP) which reaffirms Maxis' stance in upholding its commitment to conduct business professionally, ethically and with the highest standards of integrity among its employees.

MICAP is an integrity campaign that was organised for all internal and external stakeholders with the theme **#iammaxis_#Have Integrity: Own It!** This is a sequel to last year's **#Iammaxis_Integrity & Me Campaign**. A series of programmes and activities were scheduled throughout the Integrity Campaign week, such as:

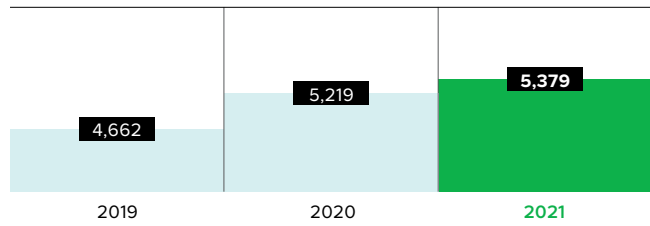
- Dissemination of the Leader's Integrity Statement;
- Integrity Poll;
- Vendor's Integrity Programme;
- Compliance Officer Round Table Discussion (RTD) on the best practices related to the Guidelines-Adequate Procedures: T.R.U.S.T. Principles; and
- Maxis Integrity and Governance Journey Webinar and the FairBiz Action Plan activities which were both carried out in collaboration with the United Nations Development Programme (UNDP).

Our third-party vendors have also joined and showed their support towards MICAP by joining the Vendor's Integrity Programme (VIP) that was conducted in 8 sessions. A total of 467 companies had participated in VIP. The objective of VIP was to enhance our vendors' awareness of the MABC System. VIP was also a refresher for our vendors on the MCOBP for Third Parties, MABC Manual, No Gift Policy, Integrity Pledge, Anti-Corruption and Anti-Money Laundering related laws and cases, Due Diligence Process and Maxis' commitment to do business with ethics and integrity through zero-tolerance of bribery and corruption.

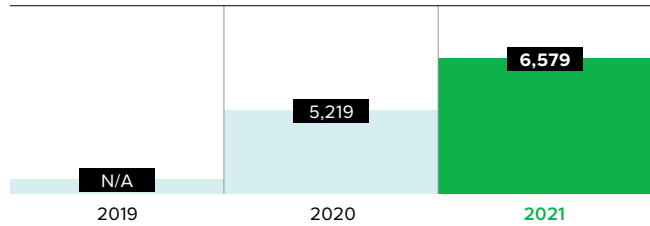
FairBiz represents the UNDP's project for "Promoting a Fair Business Environment in ASEAN". Funded by the UK Government, the ASEAN Economic Programme, The FairBiz Integrity Hub aims to expose the business community to best international practices and practical collaborative solutions between government, business and civil society to create an open and transparent business environment built on trust.

Moving forward, whilst we will continue our training, communication and education programmes on anti-bribery and AML/CFT. We have appointed compliance champions as the 'advocate of integrity' in each Division, as part of our initiative to embed a strong ethics, integrity and compliance culture. We will also constantly monitor, measure and enhance the effectiveness of the MABC System, Internal Controls and once implemented, AML/CFT structure.

Number of employees who received training on Maxis' CoC & MCOBP Assessment and Acknowledgment via Maxis Academy*



Number of employees receiving basic training related to anti-corruption and bribery via Maxis Academy*



* Employee training include all current Maxis employees and Third Party Contract Staffs, at the point of rollout

Number of ancillary training sessions for employees:

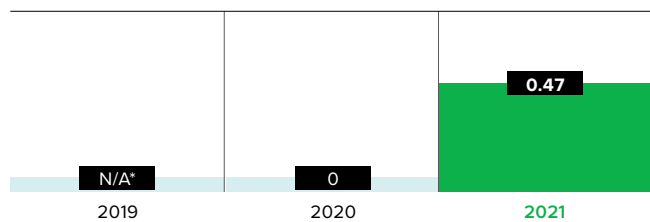


25 sessions

Third Party Training

Training Title	Sessions	Number of Companies
Vendor Integrity Programme	8	467

Percentage of employees found as non-compliant under MABC (%)



* The MABC system was established in May 2020.