



I Know - My Code of Business Practice



Policy Statement

Maxis Berhad and its group of companies (“Maxis”) is committed in conducting their business professionally, ethically and with the highest standard of integrity. As part of its commitment, Maxis practices a zero-tolerance approach towards misconduct and all forms of bribery and corruption.

This Code applies to all Maxis business dealings and relationships, and covers policies such as, but not limited to, health and safety, human rights, labour rights, data privacy and data protection, anti-bribery, and corruption. The objective of this Code, which encompasses Maxis governing policies and procedures, is to provide an overview of the legal and ethical standards expected of our employees and our business partners.

Maxis recognises the corporate responsibility to contribute to the realization of human rights and labour standards in accordance with the Malaysian laws and labour practices. These core values includes the prevention of child labour and forced labour, prevention of discrimination and any form of harassment at work, supporting the right to minimum wage, right to collective bargaining, freedom of expression, freedom of association (within the ambit of the law), coupled with the understanding of diversity and inclusion in an organization. We at Maxis value diversity and inclusion of the people whom we work with regardless of race, religion, ethnicity, and other differences.

Who does this apply to and cover?

- Directors and employees of Maxis Berhad and its subsidiaries (collectively “Maxis”).
- All 3rd party employees, contractors, consultants and/or personnel positioned in Maxis’ premises and acting on Maxis’ 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.
- Any alleged and/or suspected breaches of any Maxis policies, procedures or terms and conditions of employment will be dealt with in accordance with the Disciplinary Policy. Please refer to the [I Know – Disciplinary Policy](#) for more info.



I Know - My Code of Business Practice



Ethics Hotline (Whistle Blowing Mechanism)

We encourage openness and have an official channel for reporting wrong practices. Open to all employees as well as non-employees.

- In Maxis, we are committed to conducting business professionally, ethically and with the highest standard of integrity. As part of our commitment, Maxis practices a zero-tolerance policy against all forms of bribery and corruption, and towards any breaches involving its management, employees and business partners.
- If you think you know of any possible violations of law or unethical conducts such as any form of bribery, corruption, fraud, 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, we highly encourage you to report it.
- Your identity will be kept confidential unless required to be declared under the law.
- A complaint or report may be made verbally or in written form through the following Maxis' whistleblowing channels:
 1. Third Party Whistleblowing Link:
 - Web Intake Site: maxis.ethicspoint.com
 - Mobile Intake Site: maxismobile.ethicspoint.com
 2. Maxis Ethics Hotline via:
 - Telephone: 03 – 23306678
 - Mobile (via call, SMS & WhatsApp): 017-200 3922
 - Email: ethics@maxis.com.my
 3. Alternatively, you may write in to:
 - Senior Independent Director (for directors) / Audit and Risk Committee Chairman: vukumar@maxis.com.my
 - Head of Integrity and Governance Unit: nuribi@maxis.com.my
 - Office: Maxis Ethics Office
Level 24, Menara Maxis,
KLCC 50088 Kuala Lumpur
- Please refer to the [I Know – My Ethics Hotline \(Whistle Blowing Policy\)](#) for more info.

Maxis' Intellectual Property Rights ("IP")

- Intellectual property rights include trademarks, service marks, trade names, domain names, signs, logos, get-up, patents, utility models, registered and unregistered design rights, rights protecting trade secrets, secret processes and confidential information, rights protecting goodwill and reputation, copyrights, database rights, moral rights, know-how, formulae, techniques, methodology, proprietary technology and all other similar rights, including those subsisting in software including source codes, databases, semiconductor topographies, circuit and wiring diagrams/layouts, all over the world, whether or not registered or capable of registration, and whether now or later existing including, without limitation, where such rights are obtained by registration, any registration of such rights and all extensions or renewal thereof, applications and rights to apply for such registrations, and all benefits, privileges, rights to sue, recover damages and obtain relief for any past, current or future infringement, misappropriation or violation of any of the foregoing rights (hereinafter "IP").



I Know - My Code of Business Practice



- You are responsible for and must protect Maxis' IP.
- You agree and undertake that all rights, title and interest in and to any IP discovered, created, developed and/or produced by you, in the course of your employment with Maxis and/or the performance of your duties, obligations and responsibilities shall be and remain the sole and exclusive property of Maxis. You agree and shall execute all documents that may be necessary to convey or assign any such rights that you may have in such IP to Maxis or that otherwise may be necessary to enable Maxis to seek such protection for such IP.
- You must not use any of Maxis' IP unless such use is for legitimate purposes relating to the business of Maxis and/or such use is directed by, or in accordance with, any instructions from Maxis.
- Unless otherwise instructed by Maxis, you must not duplicate, alter, modify, reverse engineer, decompile, disassemble any IP of Maxis including, but not limited to, copyrighted materials or Maxis' proprietary software.
- You must not file any applications, make any claims of ownership including moral rights, challenge, misappropriate and / or infringe any right, title, and /or interests in or to IP which are vested in Maxis.
- You must keep proper records of documentation to all IP discovered, created, developed, and/or produced by you in the course of your employment with Maxis.
- Please refer to the [Maxis Intellectual Property Policy](#) for more info.

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.

- You cannot use Company's assets and properties for personal use.
- 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 are 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/Secret Information

Guard and manage and make use of confidential/secret information properly. Misuse is serious and can create significant adverse impact.

- In the performance of your responsibilities, obligations and duties, you may obtain or have access to Confidential Information of Maxis that is not available or known to the public.
- Confidential Information means all information of any kind, whether imprinted, electronic or any other format, whether disclosed orally or on any other form, and whether or not labelled as "Confidential", disclosed or communicated to you by Maxis or learnt or accessed by you from Maxis during your course of employment with Maxis which is used in relation to the business, customers or financial affairs of Maxis, including but not limited to, materials and information relating to:



I Know - My Code of Business Practice



- a) Maxis' IP;
 - b) all past, present, and future projects, operations, business forecasts, sales and marketing, databases and access rights to third party databases, matter lists, suppliers, investors, shareholders, strategies, trade secrets, know-how, method, methodologies, business processes, business development or planning, personnel details, human resource data, commercial relationships and negotiations of Maxis;
 - c) all customer or client (whether actual or potential) details, data and information, sales targets and statistics of Maxis;
 - d) products, equipment, services, discoveries, ideas, concepts, research work, developments, presentation papers, techniques, designs, formulae, sketches, drawings, source codes, object codes, algorithms, specifications, damages, blueprints, tracings, diagrams, models, samples, flow charts, data, disks, diskettes, tapes, proprietary information, works of authorship, inventions, processes, tools, software programs, memoranda, notes and reports whether in writing or otherwise and whether prepared by you or not;
 - e) Third Party Information; and
 - f) other technical, financial or commercial information including but not limited to pricing, financial condition and reports.
- You must always maintain the confidentiality of Maxis' Confidential Information and must not use access, and/or disclose Confidential Information to any third parties, including but not limited to family members and friends, competitors, customers and members of trade associations unless directed and/or authorized by Maxis, and then, only in such manner as directed by or in accordance with any instructions from Maxis.
 - Confidential Information must only be used solely for purposes of fulfilling and carrying out your responsibilities, obligations and duties with Maxis.
 - You must keep secret all confidential and proprietary information of non-employee third parties that Maxis has received and, in the future, will receive, in which Maxis is subject to confidentiality obligations ("Third Party Information"). You must only use such Third Party Information only for certain limited purposes consistent with Maxis' agreement with such third party. You shall treat the Third Party Information the same as Maxis' Confidential Information.
 - You must not disclose, access or use in any way during the course of your employment with Maxis, any confidential or otherwise proprietary information, files, documents, materials, equipment or property of others, including any trade secret information of former employers.
 - You must immediately notify your superior or the management of Maxis and/or immediately consult Legal Department if you become aware of any breach or alleged breach by you or by any other employees of Maxis, of the confidentiality obligations, whether or not such breach is advertent or inadvertent. You shall comply fully with any directions from Maxis with respect to remedying the breach.
 - Your confidentiality obligations in relation to Maxis Confidential Information shall survive the cessation of your employment with Maxis for any reasons including but not limited to your resignation, retirement and/or termination in accordance with the law.
 - This section is to be read together with the Non-Disclosure Agreement that you have executed with Maxis or any non-disclosure / secrecy terms and conditions imposed by Maxis.



I Know - My Code of Business Practice



Use of Open-Source Software (“OSS”)

- In the course of your employment with Maxis, you may be required to produce, develop and create software for Maxis where you may consider the use of open-source software (“OSS”).
- You are only allowed to use or incorporate OSS which have been vetted by Maxis.
- You are not allowed, unless with prior written consent from your superior or the management of Maxis to use, incorporate or adapt OSS which has not been vetted by Maxis.
- Please refer to the [Maxis OSS Policy](#) (which is part of [Maxis Intellectual Property Policy](#)) for more info.

Personal Data Protection Act 2010 (PDPA)

It's the law and it says you must protect personal data and sensitive personal data.

- 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 name, address, identification card number, passport number, email addresses and contact details.
- PDPA shall apply to you if you:
 1. Process any personal data in respect of any commercial transactions;
 2. Have control over or authorize the processing of any personal data in respect of any commercial transactions; or
 3. Process any customers' personal data; in respect of any commercial transactions
 4. Use Maxis' equipment for processing customers' personal data.
- Please refer to the [Data Privacy and Protection Guidelines](#) for more info.

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 information 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.
- Please refer to [Bursa Malaysia](#) for more info.



I Know - My Code of Business Practice



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 for 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. Your 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 [I Know - My Work Schedule and Time Off Policy](#) for more info.

Conflict of Interest:

1. *Other Employment/Appointments*
2. *Dealings of family members/relatives/ friends with the Company*
3. *Financial/Family interest in competitors, suppliers and customers*

As a general rule, employees should not be involved or engage in any activity which interferes with the proper performance of his or her duties or obligation to the Company, whether such activities are related to the Company's business or not.

1) Other Employment/Appointment

- An employee shall not accept or perform any work for any other company, firm or organization whether as an employee, executive, director, partner, advisor, agent, manager or consultant or be engaged in any way concerned without the prior approval of the Company. The approval process is set out under 'Disclosure and Consent' below.
- For fees agreed on for the Other Employment/Appointments, approval from the Company is required at the point of declaration of the conflict of interest.
- Upon getting the Company approval, an employee should ensure that the outside employment/activity;
 - does not jeopardies the employee's deliverables or affect the ability of the employee to devote appropriate time and attention to his/her assigned job responsibilities. There should not be a conflict between the employee's duty to the Company and self-interest, as an employee should always act in the best interest of the Company,
 - any time off required to perform other employment/appointment should be with the approval of the employee's manager
 - does not impact the proper use of Company assets, especially for personal gain or benefit.

2) Dealings of family members/relatives/friends with the Company

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

3) Financial/Family interest in competitors, suppliers and customers



I Know - My Code of Business Practice



- an employee who has any financial interest or own, either directly or indirectly through the employee's family, shares or other forms of beneficial interest in companies, firms or sole proprietorships are required to disclose his/her interest to the Company and obtain consent prior to entering any transaction with such entity and/or becoming aware of a conflict;
- this includes companies, firms or sole proprietorships that are:
 - engaged in a business which competes with the Company's business
 - supply materials, equipment, property and/or services
 - customers of the Company; and
 - have other business dealings with the Company.
- upon becoming aware of a conflict, the employee must seek approval from the Company immediately. The approval process is set out under 'Disclosure and Consent' below.

Approval Process: Disclosure and Consent

- Prior to taking up a new employment/appointment and/or becoming aware of a potential conflict under either of the three (3) categories above, the employees must notify the Company immediately by logging a request under Conflict of Interest in MyRemedy, in order to get the final approval from the Company (refer to required level of approval listed below):
 - Other Employment/Appointments
 - Final Approval for **MMT & SLT level**: Remuneration Committee (RC)
 - Final Approval for **below SLT level**: CPTO & CEO (or their appointed delegates)
 - Dealings of family members/relatives/ friends with the Company
 - Final Approval for **all employees**: CPTO (or her appointed delegate)
 - Financial/Family interest in competitors, suppliers and customers
 - Final Approval for **all employees**: CPTO & CEO (or their appointed delegates)
- Once approved, to upload and declare in MyRemedy
- Other Employment/Appointments:

When reviewing each approval request by an employee, the Company will consider, among other factors:

- (a) the amount of time that the employee must dedicate to the Other Employment/Appointments;
- (b) whether the employee's activities are related to the Company's business or not;
- (c) the quantum of fees that the employee will receive for such other role;
- (d) 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, an agency, a society, council or NGO;
- (e) whether the employment adversely impacts Maxis Group's reputation;
- (f) the type of working arrangement that the employee currently has with Maxis Group; and
- (g) whether employee may be granted approval to retain the remuneration earned from the said employment / appointment

- Dealings of family members/relatives/friends with the Company & Financial/Family interest in competitors, suppliers and customers:



I Know - My Code of Business Practice



Full and accurate disclosure of the details and extent of interest should be made (i.e. details of all persons connected with the employee, amount of profit to be derived or the percentage of equity control) and other material facts and circumstances.

Fraud

Fraud is 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.
- Suspected irregularities or corruptions must be reported to the Ethics Hotline immediately. Do not discuss your suspicions with anyone other than the investigation team.

Anti-Bribery

- Maxis is committed to conduct their business professionally, ethically and with the highest standard of integrity. Maxis practices a zero-tolerance approach against all forms of bribery and corruption and upholds all applicable laws on anti-bribery and corruption.
- In line with Maxis' policy and zero-tolerance approach against bribery and corruption, Maxis has put in place the Maxis Anti-Bribery and Corruption System ("**MABC System**") to consolidate and manage elements, policies, objectives and processes in relation to bribery and corruption risks in the Company.
- All employees are required to comply with the MABC Manual and its corresponding policies.
- Please refer to the [Maxis Anti-Bribery and Corruption Manual](#) for more info.

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.
- Any unauthorized use of Maxis' IP is strictly prohibited. You must adhere to [Maxis Intellectual Property Policy](#) at all times when posting on social media.
- You must not publish, post, release any materials or Confidential Information or participate in any forums that may harm the reputation of Maxis.



I Know - My Code of Business Practice



- 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 of whether you are using your own or Company's equipment/devices.
- Please refer to the [Employee Social Media Guide](#) for more info.

Media

Do not engage with the media, analysts or shareholders if you are not authorized to do so.

- If you receive any queries from the media, direct them to the Corporate Affairs Division. They are the right people to manage this stakeholder. Don't respond unless you have been authorized to do so.
- If you receive any queries from financial analysts, please direct them to the Head of Investor Relations, while any queries from shareholders should be directed to the Company Secretary. They are the right people to manage these stakeholders.
- For publicly available information and latest news on the company, please click [here](#).
- For investor information, please click [here](#).

My Conduct With Internal Parties & External Parties

Treat others as you want to be treated. To outsiders, you ARE Maxis!

Conduct with Internal Parties

- 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 discrimination.
- 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.

Conduct with External Parties

- How you behave out there portrays the image of the Company. Therefore, you must conduct yourself professionally, ethically and with the highest standard of integrity, at all times.
- 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.



I Know - My Code of Business Practice



Giving & Receiving Business Courtesies

Small gifts are OK, but there are limits.

- Maxis practices "No Gift Policy". As such, Save as allowed under provided by the MABC Manual and the I Know - Gift Policy, all Maxis Personnel, including their family members are prohibited from receiving and/or offering gifts whether directly or indirectly, and must immediately refuse and/or return such gifts.
- Please refer to the [I Know - Gift Policy](#) for more information.

Purchasing & Sourcing

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

- As a Maxis employee, you shall act with the highest ethical and business standards when engaging vendors, including upholding Maxis Environmental, Social and Governance (ESG) Commitments.
- You must engage Procurement, who shall act as the main point of contact for commercial discussion/negotiations, in line with Maxis' Code of Ethical Purchasing.
- Your purchase decision must be made in the interest of the Company. You must adhere to Maxis' Code of Ethical Purchasing and 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 Procurement 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.
- Please refer to the [Procurement Policy and Standards](#) for more info.

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, including while working from home.

- 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 2022, EQA 1974, ISO 45001, QMS 9001 (Network), ISO 14001 (Network).



I Know - My Code of Business Practice



- You must be appropriately trained and competent in the specified areas of HSE in the work that you do.
- You are required to wear or use at all times any protective equipment of clothing provided depending on your nature of work.
- You are required to assess the risks of your work and the impact to other staff, 3rd party staff, contractors, consultants, visitors and any other people who could be affected by your activities.
- You must take reasonable care for the safety and health of yourself and of other persons who may be affected by your acts or omission of your work and responsibilities which includes but not limited to designing, constructing and maintaining of those works.
- You are required to cooperate and actively participate in related HSE programs. Visit the [HSE Portal](#) to review and understand the general requirements related to your work and the HSE Management System (HSEMS).
- You must immediately report any occupational incident (accident, hazard, unsafe act or condition) to your manager/immediate supervisor.
- If you are a manager and/or managing/engaging 3rd party staff, contractors, consultants, personnel working for Maxis and/or visitors, you have the additional responsibility as per below;
 - ensuring that all comply with HSE requirements as per this document and the HSEMS as per the [HSE Portal](#).
 - ensuring arrangement for the effective planning, organization, control, monitoring and review of HSE and other preventive and protective measures, in relation to your work
 - immediately report any occupational incident (accident, hazard, unsafe act or condition) to HSE team via mobile. Follow up via official reporting in MyRemedy.
- Please refer to the [HSE Portal](#) for more info.

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
- Please refer to the [I Know - My Security Guide](#) for more info.



I Know - My Code of Business Practice



Owner: Compliance & Employee Relations

Key Contacts can be found [here](#)

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