

# I Know - My Ethics Hotline (Whistleblowing Policy)

## I KNOW

Integrity means acting when it matters. If you notice something concerning, speak up, it's the right thing to do. Here's what you should know about the Ethics Hotline:

### Purpose

Maxis Berhad and its group of companies ("Maxis") are committed to conducting our business with the highest possible standards of ethical, moral, and legal business conduct and practices, in all aspects of its business.

The aims of this I KNOW – My Ethics Hotline (Whistleblowing Policy) ("this Policy") are to:

- (a) provide a consistent, systematic, corporate-wide process for managing any actual or potential improper conduct;
- (b) assist in ensuring that the improper conducts are identified and dealt with appropriately;
- (c) encourage all employees and Third Parties to raise genuine concerns and complaints of suspicious circumstances as early as possible. Their concerns and complaints will be taken seriously and investigated as appropriate and their identity will remain anonymous;
- (d) accept reports made anonymously through designated reporting channels;
- (e) provide all employees with guidance as to how to raise those concerns; and reassure all employees that they are able to raise genuine concerns without fear of reprisal, even if they turn out to be mistaken.

### Applicability

This Policy is applicable to all Maxis internal and external parties, including but not limited to the following:

- (a) Maxis Management Team and Board of Directors;
- (b) All employees of Maxis including employees on secondment from Maxis' member firms and trainees; and
- (c) All third parties including contractors, consultants, personnel acting on Maxis' behalf, third parties or entities doing business with Maxis, and Maxis' customers ("Third Parties").

### Requirement of Good Faith

Since an allegation of improper conduct may result in serious repercussion to the person being alleged of improper conduct, a report of improper conduct should be made in good faith with a reasonable belief that the information shared is substantially true, for the best interest of Maxis and not for personal gain.

If the investigation revealed that the disclosure was made with malicious intent, appropriate action can be taken against the whistleblower.

### Scope of reporting

Improper conduct means any conduct which constitutes a disciplinary or criminal offence, and may include:

- (a) breach or violation of any laws, regulations or policies;
- (b) intimidation or harassment including but not limited to threats of retaliation or adverse employment action, abuse, bullying, physical or psychological or sexual harassment etc.
- (c) gross misconduct, fraud, money laundering, or corruption;
- (d) non-compliance or violation of the MABC System, including the MABC Manual and relevant policies/SOP/guidelines such as Maxis' general no gift policy, prohibitions against facilitation payments or "duit kopi", and the policies on sponsorships, endorsements and donations; or
- (e) a threat to take any of the above actions.

### Personal work-related grievances

The Ethics Hotline is intended for reporting serious concerns such as misconduct, unethical behavior, or breaches of legal or regulatory obligations. While we recognize that personal work-related grievances are important, they typically fall outside the scope of whistleblower disclosures unless they reveal broader wrongdoing.

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Examples of personal grievances include:

- (a) Interpersonal conflicts or disputes
- (b) Dissatisfaction with performance reviews
- (c) Concerns about pay, bonuses, or benefits
- (d) Issues related to promotions, transfers, or job roles
- (e) Complaints regarding disciplinary actions or termination

We highly encourage employees to raise such matters with the Compliance & Employees Relations (CER) team, who are best positioned to support and resolve these concerns through appropriate channels. The proper confidentiality will also be accorded to reports made to CER.

However, a personal grievance may be treated as a whistleblower report if it involves:

- (a) Systemic misconduct or unethical practices
- (b) Retaliation for raising concerns or participating in investigations
- (c) Discrimination, harassment, or bullying in breach of company policy or law
- (d) Abuse of authority or misuse of company resources

Such disclosures will be assessed under the whistleblower framework.

## Reporting Channels

A complaint or report may be made verbally or in written form through the following Maxis' whistleblowing channel:

- |     |   |  |
|-----|---|--|
| (1) | <b>Third Party Whistleblowing Link</b> (available 24/7)                       |  |
|     | Web intake Site   | : maxis.ethicspoint.com  |
|     | Mobile Intake Site  | : maxismobile.ethicspoint.com  |
| (2) | <b>Maxis Ethics Hotline via</b>   |  |
|     | Mobile (via call, SMS & WhatsApp)   | : 017- 2003922   |
|     | Monday to Friday: 9am to 6pm  |  |
|     | E-mail  | : ethics@maxis.com.my  |
|     | 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 Address  | : Maxis Ethics Office, Level 15, Menara Maxis, KLCC, 50088, Kuala Lumpur |

## Whistleblower Protection reported within Maxis

### Protection of Confidential Information

- (a) confidentiality of the whistleblower's identity, except to the extent permitted by law or required by the relevant authorities, shall be kept confidential and will not be disclosed without the prior consent of the whistleblower; and
- (b) information that might allude to the whistleblower's identity will only be disclosed during an investigation if:
  - with the consent of the whistleblower; or
  - the information is reasonably necessary to conduct a thorough and effective investigation into the misconduct; and
  - all reasonable steps are taken to minimize the risk that the whistleblower will be identified from the information.

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- (c) confidentiality of the whistleblower's identity applies only to reports made through the designated channels and does not apply if the whistleblower discloses their identity outside those channels.

## Protection from Detrimental Action

No disciplinary, adverse and detrimental actions will be taken against the whistleblower with respect to the subject matter reported. This includes, but is not limited to, actions such as suspension, dismissal or threat of dismissal; the imposition of any penalty, directly or indirectly; and any negative impact on the whistleblower's performance review/appraisal ratings, KPIs, promotion, increments or bonuses, on the assumption that the report is done as per the requirement of this Policy.

## Limitation of Liability

Maxis will not be liable to the whistleblower for any loss, damage or detriment arising from the receipt, assessment, handling, investigation or outcome of a report. This covers good faith decisions and reasonable judgment calls made in connection with a report.

## Support Available to Whistleblower

Whistleblower will be offered access to confidential counselling services through our Employee Assistance Programme (EAP) to help manage any stress or anxiety related to the disclosure process. Maxis is committed to ensuring the whistleblower's safety and to providing a safe working environment.

## **Whistleblower Protection by Relevant Authorities**

Any referral/escalation made by any person including an employee of Third Parties who whistleblows in good faith of any suspected and/or actual improper conduct within Maxis to relevant authorities, will be accorded protection under the *Whistleblower Protection Act 2010* by the relevant authorities.

## **Whistleblowing Investigation Process**

- (a) Upon receipt of a complaint, the Internal Assurance shall within fourteen (14) working days, conduct an initial inquiry into the complaint to determine its genuineness and the seriousness of the concern / allegation which has been raised.
- (b) If the initial inquiry made by the Internal Assurance indicates that the complaint has no basis or merits or it is not a matter to be dealt with under this Policy, it may be dismissed by the Internal Assurance at this stage. Notification will be given to the whistleblower of such dismissal, where the identity of the whistleblower is known.
- (c) If the initial inquiry indicates that further investigation is necessary, the Internal Assurance will carry out a thorough investigation into the complaint and shall involve other officers or personnel as necessary to assist in carrying out the investigations. Such investigation will be conducted in a fair manner as a neutral fact-finding process and without any presumption of guilt.
- (d) All findings after due investigation will be documented by the Internal Assurance and the whistleblower shall be notified of the outcome of the investigation, where the identity of the whistleblower is known. The time period from the date of receipt of the complaint and the findings complaint shall not exceed sixty (60) working days unless otherwise extended, based on the complexity of each case.
- (e) All reports of suspected or real anti-corruption complaints will be escalated to the Defalcation Committee or the Special Defalcation Committee (if the complaint involves Maxis Management Team). The Defalcation Committee or the Special Defalcation Committee may, in appropriate cases, notify the relevant enforcement authorities for the whistleblower and the information disclosed to receive protection under the Whistleblower Protection Act 2010 and/or any other relevant legislation.
- (f) The results of the investigation (if any) will be reported to the Audit and Risk Committee to ensure appropriate action is taken to address such improper conduct.

The Board of Directors and Maxis Management Team will take serious and consistent action against internal and external parties who commit improper conduct.