

I Know - My Ethics Hotline (Whistle Blowing Policy)

I KNOW

Who and how to whistle blow if I wish to report of any improper conduct or activities in Maxis?

Overview

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 (Whistle Blowing 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) 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.

Who does this Policy apply to?

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").

What does whistleblowing mean?

A complaint of improper conduct should be made in good faith with a reasonable belief that the information relating to the same is substantially true, and not for personal gain.

Even if employees are not able to identify a particular person to which the improper conduct relates to, they can still make a report of improper conduct through the whistleblowing channel with whatever information that they have.

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

- (a) breach or violation of any laws, regulations, policies or guidelines;
- (b) intimidation or harassment;
- (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.

What should I do if I wish to whistleblow?

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

- (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- 2003922
E-mail	:	ethics@maxis.com.my

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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 24, Menara Maxis, KLCC, 50088, Kuala Lumpur

What kind of protection do I have as a whistleblower?

Aligned with the Whistleblower Protection Act 2010, any person including an employee of Third Parties who whistleblows in good faith of any suspected and/or actual improper conduct within Maxis will be accorded with the following protection by the authorities in the event the case is escalated to the relevant enforcement agencies:

- 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
- no disciplinary, adverse and detrimental actions will be taken against the whistleblower with respect to the subject matter of the complaint he/she reported, including suspension, dismissal or threat to dismiss the whistleblower from his position in Maxis and imposing any penalty, directly or indirectly, on the whistleblower.

What happens after I lodge my complaint?

- Upon receipt of a complaint, the Internal Assurance shall within fourteen (14) working days, conduct an initial inquiry of the complaint to determine its genuineness and the seriousness of the concern / allegation which has been raised.
- 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.
- 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.
- 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.
- 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.
- 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.

What are the consequences of committing an improper conduct?

The Board of Directors and Maxis Management Team will take serious and consistent action against internal and external parties who commit an improper conduct such as, but not limited to the following:

- Reprimand, take disciplinary action, impose punishment as appropriate;
- Transfer to another department/relocation of place of employment;
- Termination or suspension of employment or any other arrangement with the Company;
- Report to the relevant authorities (if applicable); and/or
- Any other action deemed appropriate by the Company.