

MAXIS

Anti-Bribery and Corruption Manual

Title: Maxis Anti-Bribery and Corruption Manual		
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Maxis Anti-Bribery and Corruption ("MABC") Manual

1. General

(a) Policy statement

Maxis Berhad and its group of companies ("**Maxis**") are 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.

This policy applies to all Maxis business dealings and relationships. The Maxis Code of Business Practice, MABC system, policy and procedures and Maxis Integrity and Compliance framework (MICF) apply throughout Maxis and reflect Maxis' commitment to zero tolerance approach against all forms of bribery and corruption and upholds all applicable laws on anti-bribery and corruption.

The Board and management of Maxis are committed to implementing and enforcing effective and robust policies and procedures to prevent, detect, respond, monitor and eliminate bribery and corruption to the continual improvement of the MABC system and related Anti-Bribery Management System. Integrity and Governance Unit headed by the Compliance Officer is assigned with the responsibility to oversee the implementation of MABC system/Anti-Bribery Management System with direct access to the Board and management of Maxis for issues relating to bribery and corruption. Maxis employees and others acting for or on behalf of Maxis are strictly prohibited from directly or indirectly soliciting, accepting, or offering bribe in relation to Maxis' business and operations. Maxis employees who fail to comply with the I Know - Maxis Code of Business Practice, MABC system and related Anti-Bribery Management System will be subjected to the appropriate disciplinary measures.

Maxis provides avenues for all Maxis employees and members of the public to make reports on any improper conduct within Maxis is governed by the I Know - Whistleblowing Policy and Maxis Whistle Blowing Policy respectively.

(b) Overview

In line with Maxis' policy against bribery and corruption, Maxis has put in place the Maxis Anti-Bribery and Corruption System ("**MABC System**") to consolidate and manage policies and processes in relation to bribery and corruption risks in Maxis.

This Maxis Anti-Bribery and Corruption Manual ("**MABC Manual**"):

- aims to set out the main principles, policies and guidelines upon which Maxis practices in relation to anti-bribery and corruption.
- is designed to provide reference and guidance to all persons working for and with Maxis in observing and complying with the applicable laws on anti-bribery and corruption; and
- is not meant to cover all possible situations that may arise in the course of business.

(c) Definition of bribery and corruption

Bribery and corruption refer to the offering, promising, giving, accepting or soliciting of a benefit or gratification (eg. money, gift, reward or services) of any value which can be financial or non-financial, directly or indirectly, and irrespective of location, in violation of applicable law as an

inducement or reward for a person acting or refraining from acting in relation to the performance of the person's duties.

A bribe may come in the form of kickbacks, favours, gratuities, gifts, hospitality, donation, facilitation payments, preferential terms or anything of value.

(d) MABC System/Anti-Bribery Management System Objectives

- Inculcate Integrity Culture

Employees and stakeholder will understand and be more attentive to company's stance on bribery and corruption. This will reduce the likelihood of bribery and corruption as specific tools for reducing corruption and bribery are provided to everyone.

- Prevention Of Bribery And Corruption

The Maxis Integrity and Compliance Framework (MICF) will facilitate the company's initiatives on prevention, identification, and management of cases of corruption and to minimize the criminal and civil action by the authority.

(e) Scope and application

This MABC Manual is applicable to:

- all directors and employees of Maxis;
- all third party employees, contractors, consultants and/or personnel acting on Maxis' behalf; and
- all parties or entities doing business with Maxis, including dealers, resellers, distributors, System Integrator (SI) Partner and content/digital solution providers

(collectively referred to as "**Maxis Personnel**").

All Maxis Personnel are expected to comply with this MABC Manual and all applicable laws on anti-bribery and corruption.

2. MABC System stakeholders

The main stakeholders in the MABC System are as follows:-

- Board of Directors;
- Company Secretary;
- Maxis Management Team;
- Compliance Officer;
- Enterprise Risk Management;
- Internal Audit;
- Finance;
- Procurement;

- Strategic Investment;
- People and Organisation;
- Legal;
- Corporate Affairs;
- Donations Committee; and
- Information Technology ("IT")

(collectively referred to as "**MABC System Stakeholders**").

3. Gifts

As a general rule, Maxis practices a "No Gift Policy". Saved as allowed under the I Know – Gift Policy in [Annexure 1](#), 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.

Any gifts which:

- (a) are in the form of cash or cash equivalent, including vouchers, discounts, coupons, shares and commission;
- (b) involves parties engaged in a tender or competitive bidding exercise;
- (c) comes with a direct/indirect suggestion, hint, understanding or implication that some expected or desirable outcome is required in return for the gift; or
- (d) is lavish and/or excessive or may adversely tarnish the reputation of Maxis,

is strictly prohibited.

As set out in the I Know – Gift Policy, gifts are only permitted in the following situations:

- (a) Receiving gifts from third parties
 - (i) during official internal Maxis events or functions;
 - (ii) during official external Maxis events or functions;
 - (iii) when refusing the gift is likely to seriously offend or severely affect Maxis' business relationship with a third party, or when it is against business etiquette or is impractical to refuse such gift.
- (b) Offering gifts to third parties
 - (i) during official internal Maxis events or functions;
 - (ii) as an exchange of gifts during official external Maxis events or functions;
 - (iii) gifts which are token gifts of nominal value with Maxis' logo as part of Maxis' brand building or promotional activities;
 - (iv) gifts given in conjunction with any festive or occasion, limited to RM 250 only.

Details of the guidelines and procedures can be found in the I Know – Gift Policy.

4. Hospitality and Entertainment

As a general rule, Maxis recognises that it is common practice to provide modest hospitality and entertainment to build and foster business relationships. However, all hospitality and/or entertainment, if received, must be unsolicited and must not be perceived as a form of bribery and must comply with the I Know- My General Claims Policy in [Annexure 2](#).

As set out in the I Know- My General Claims Policy, hospitality and entertainment are subject to the following:

(a) Providing hospitality and/or entertainment

- (i) Each claim for hospitality and/or entertainment must not exceed (1) RM 500 per claim for employees, and (2) RM 1,000 per claim for Heads of Divisions and Directors.
- (ii) Any claims exceeding the limit in (1) and (2) must be jointly approved by the following:

Claims by:	Approved by:
Employees	Heads of Division and Compliance Officer
Heads of Division	Chief Executive Officer and Compliance Officer
Chief Executive Officer and directors	Chairman and Compliance Officer

(b) Receiving hospitality and/or entertainment

- (i) All Maxis Personnel are prohibited from soliciting hospitality and/or entertainment.
- (ii) Maxis Personnel are allowed to receive hospitality and/or entertainment only if it is appropriate, not excess, not illegal and not given in response to or in anticipation of a favourable business decision.

(c) Providing/receiving hospitality and/or entertainment overseas

- (i) Any claims for hospitality and/or entertainment overseas must be jointly approved by the following:

Claims by:	Approved by:
Employees	Heads of Division and Compliance Officer
Heads of Division	Chief Executive Officer and Compliance Officer
Chief Executive Officer and directors	Chairman and Compliance Officer

5. Sponsorship and Endorsement

Maxis recognises that sponsorships and endorsements can be legitimate ways of building Maxis' business and brand. All sponsorships and endorsements made by Maxis are governed by the Sponsorship & Endorsement Policy and Guidelines in [Annexure 3](#).

Maxis also recognises that sponsorships and endorsements may be used as a means or cover up of a bribe. As such, no sponsorship or endorsements shall be given in return for an improper business advantage or be used as a disguise for a bribe or Maxis is or may be participating in a tender.

In essence, sponsorships and endorsements made by Maxis must be aligned with the promotion of Maxis' branding and are subject to the Limits of Authority and approval of the Head of Brand & Marketing and Chief Corporate Affairs Officer.

6. Corporate Social Responsibility ("CSR") and Non-CSR Donations and Contributions

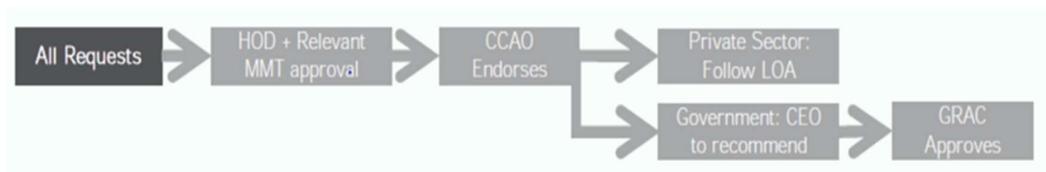
All CSR and non-CSR donations and contributions made by Maxis are governed by the CSR and Non-CSR Donations and Contributions Policy in [Annexure 4](#).

As set out in the CSR and Non-CSR Donations and Contributions Policy, all CSR and Non-CSR Donations and Contributions requests are subject to the following:

(a) CSR-related requests from private sector or government sector

All CSR-related requests from private sector or government for donations and contributions are subject to:

- (i) Head of Department's approval and relevant MMT's approval; and
- (ii) Chief Corporate Affairs Officer's endorsement; and
- (iii) If the request is government related, CEO recommendation and GRAC's approval are required.



(b) Non-CSR related requests from private sector or government sector

All non-CSR related requests for donations and contributions are subject to the following:

- (i) For requests from the private sector, approvals from Head of Division and Donation Committee ("**DOCO**") are required;
- (ii) For requests from the government, Head of Division's endorsement, DOCO's and CEO's recommendations are required before seeking GRAC's approval.



7. Facilitation Payment and/or Extortion Payment

(a) Facilitation Payment

Maxis strictly prohibits accepting or giving, whether directly or indirectly, any facilitation payments.

“Facilitation payment”, often referred to as “*Duit Kop*” in Malaysia, is an illegal or unofficial payment made in return for services which the payer is legally entitled to receive without making such payment.

This usually occurs as a payment to a public official or person including private individuals, who has authority to grant certification, licenses, permissions or permits, in order to secure or expedite such process. It is important to note that facilitation payments do not necessarily involve cash or other financial asset, it may be in the form of any advantage with the intention to influence the public official or such person including private individuals in his duties.

When a demand for a possible facilitation payment is made, the following steps may be followed to resist and reject the demand:

- (i) take detailed notes of discussions and conversations with the official;
- (ii) state Maxis' policy and commitment against bribery and corruption;
- (iii) request for another colleague or supervisor to be present as this may discourage the official from demanding a payment;
- (iv) clarify what is being asked for and question the legitimacy of the request.
- (v) request that the official show the requirement or validity for the payments or fee that is demanded;
- (vi) if the official still demands the payment, ask to speak with the official's supervisor;
- (vii) if that is refused, reiterate Maxis' prohibition against facilitation payments and inform that no payment can be made without an official receipt;
- (viii) if the above methods are exhausted, accept the consequences of refusing the payment (such as delay in approvals or refusal of licences and approvals). **DO NOT** make any unofficial payments;
- (ix) report the incident to the Compliance Officer as soon as possible.

(b) Extortion Payment

Maxis strictly prohibits the accepting or giving, whether directly or indirectly, extortion payments.

Extortion is the demanding of a gratification, whether or not coupled with a threat if the demand is refused.

8. Third Parties

Maxis expects all third parties doing business or dealing with Maxis to share our commitment to zero-tolerance against bribery and corruption by complying with this MABC Manual and all applicable laws on anti-bribery and corruption. All third parties are required to comply with the Code of Business Practice for Third Parties in [Annexure 5](#) and all other relevant policies.

It is Maxis' policy to conduct appropriate and adequate due diligence on all third parties before entering into any formal arrangements with the relevant third parties.

9. Employees

Maxis upholds the principle of workforce diversity, equal opportunity, non-discrimination and fair treatment in all aspects of employment. As such, the recruitment of employees shall be done in accordance with the established standards and procedures.

It is Maxis' policy that appropriate and adequate due diligence is carried out on all prospective employees.

Appropriate training on the MABC System shall also be provided upon the commencement of employment.

During the course of employment, all Maxis employees shall:

- (a) comply with this Manual, the I Know - Code of Business Practice in [Annexure 6](#), and all other policies/SOP/guidelines of Maxis in relation to the MABC System;
- (b) attend annual refresher trainings on the MABC System;
- (c) declare any actual or potential conflict of interest through the Employee Conflict of Interest Declaration in [Annexure 7](#);
- (d) complete the Employee Integrity Pledge in [Annexure 8](#); and
- (e) comply with anti-bribery and corruption laws.

10. Whistleblowing

Maxis encourages all Maxis Personnel and customers to report any real, potential and/or suspected bribery or corruption.

Anyone who makes a report, complaint or disclosure about any real, potential and/or suspected bribery or corruption risk in good faith, belief and without malicious intent, is given the protection of confidentiality and will not suffer any detrimental action.

Maxis has established a whistleblowing channel known as "Ethics Hotline", which is designed to facilitate and allow all Maxis Personnel and customers to report any real, potential and/or suspected bribery or corruption. The details and procedures of the Ethics Hotline can be found in the I Know – Whistleblowing and Ethics Hotline Policy in [Annexure 9](#).

Any Maxis employees or member of the public who wishes to report improper conduct may remain anonymous.

11. Violation and Investigation

Any conduct which is non-compliant with or in violation of this MABC Manual and/or the MABC System will be taken seriously and are subject to disciplinary actions.

Where non-compliance with or violation of this MABC Manual and/or the MABC System is detected or a complaint or report is received, an investigation may be carried out.

12. Record Keeping

Record keeping is integral to the MABC System as it serves as an evidence that Maxis has taken adequate measures and proper procedures in addressing corruption risks and issues.

All MABC System Stakeholders are responsible for keeping proper documentation in their course of complying with the MABC System.

All documentation in relation to the MABC System shall be furnished to the Compliance Officer on a quarterly basis to be kept and maintained on the Intranet.

13. Monitoring and Review

(a) Audit

The Internal Assurance Department oversees and monitors the performance of and compliance with the MABC System. An internal audit shall take place on an annual basis to evaluate the adequacy of the MABC System.

The findings of the audit shall be presented to the Audit and Risk Committee as well as to the Board of Directors.

(b) Risk Assessment

The Enterprise Risk Management ("**ERM**") Department facilitates the identification, assessment and management of bribery risks of Maxis. A risk assessment in relation to bribery and corruption risks shall be conducted on a regular basis.

The ERM shall record any bribery and corruption risks identified in the respective departments in the risk register.

A report on the findings of the risk assessment shall be presented to the Board of Directors for review.

Annexures

No.	Policy Name
1.	I Know – Gift Policy
2.	I Know – My General Claims Policy
3.	Sponsorship & Endorsement Policy and Guidelines
4.	CSR and Non-CSR Donations and Contributions Policy & Guidelines
5.	Code of Business Practice for Third Parties
6.	I Know - Code of Business Practice
7.	Employee Conflict of Interest Declaration
8.	Employee Declaration Form
9.	I Know - Whistleblowing and Ethics Hotline Policy

Note: For the annexures above, please refer to SharePoint.