



WHISTLEBLOWING /
SPEAKING UP POLICY
AND PROCEDURES

Document Revisions Record

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Definition

| Terms | Definition |
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| Axiata Group | Axiata Group Berhad and its subsidiaries, joint ventures and other companies where Axiata – directly or indirectly – has a controlling interest/majority stake |
| BAC | Board Audit Committee |
| GCIA | Group Chief Internal Auditor |
| Reporter | Whistleblower; person who comes forward with certain concern and/or facts of wrongdoing/misconduct |
| Speak Up Channel | Axiata Group's speak up/whistleblowing channel i.e. https://wrs.expolink.co.uk/axiata |

1. INTRODUCTION

- 1.1 Uncompromising Integrity is one of the core values embraced by Axiata Group Berhad and its subsidiaries (collectively referred to as “Axiata Group”). Axiata Group is committed to upholding the highest standards of lawful and ethical conduct, by demonstrating honesty, fairness, transparency and accountability in all our conduct and dealings.
- 1.2 The purpose of this Policy is to govern the speaking up/whistleblowing process, establish a mechanism and to encourage everyone who has a relationship with the Axiata Group to voice and register their concerns, including any act or conduct that is in violation of the code of conduct, actual or suspected misconduct, illegal or unethical behaviour, without fear of retaliation or unfair treatment.

2. SCOPE

- 2.1 This Policy applies to all wholly owned Axiata subsidiaries and to those joint ventures and other companies where Axiata – directly or indirectly – has a controlling interest/majority stake.
- 2.2 Employees, suppliers, business partners, contractors, customers, associates and other stakeholders/counter parties shall voice their concerns (“Reporter”), so long as there is a reasonable belief or basis for the concern and the disclosure is made in good faith and not for personal gain or motivated by ill or malicious intention.
- 2.3 Reporter shall ensure that mere rumour or hearsay information is not the basis for speaking up or to whistle blow.
- 2.4 The official Speak Up channel (<https://wrs.expolink.co.uk/axiata>) can be used to report any concerns related to Axiata Group business practices and non-compliances relating to, but not limited to, the areas mentioned below. This channel is not meant for anyone to report customer complaints or to make enquiries on any of the services that the Axiata Group provides to its customers. In order for us to serve you better, please visit the respective Axiata company/subsidiary’s website or call the local customer service number.

- (a) Abuse of Power/Authority
- (b) Accounting, internal controls, auditing or IT
- (c) Anti-competition
- (d) Breach of company policy
- (e) Bribery & corruption
- (f) Data confidentiality or privacy
- (g) Conflict of interest
- (h) Fraud & breach of trust
- (i) Gifts, sponsorships, donations, entertainment & hospitality
- (j) Harassment, bullying & sexual misconduct
- (k) Health, Safety, Security & Environment

- (l) Insider trading
- (m) Malpractices
- (n) Misappropriation of company assets
- (o) Misuse of social media or business communications
- (p) Money Laundering
- (q) Retaliation from Speaking Up
- (r) Substance abuse or drugs
- (s) Theft or misuse of resources
- (t) Violation of any law and regulation
- (u) Workplace & people

3. WHAT TO INCLUDE WHEN REPORTING A CONCERN

- 3.1 Concerns should be raised via the official Speak Up channel at <https://wrs.expolink.co.uk/axiata> . To raise a concern by phone, visit the Speak Up weblink to obtain a local phone number. Both the web and phone options are available 24 hours a day, 7 days a week, and can be used by employees, suppliers, business partners, contractors, customers, associates and other stakeholders/counter parties.
- 3.2 When using the official Speak Up channel, the Reporter is required to include as much factual details as possible, such as the background or nature of the concern, when and where it happened, any other supporting evidence (if available) and persons involved including witnesses. In addition, the Reporter is strongly encouraged to disclose his/her name and contact information. Notwithstanding this, the Reporter can opt to remain anonymous if he/she so wishes.
- 3.3 Axiata Group shall protect the confidentiality of the Reporter and the information disclosed very seriously. If the person chooses to disclose his/her identity, the only people who will know his/her details are the Administrators of the Speak Up channel, the Investigator and/or the Investigation Team, and the relevant authorised personnel who have access to information recorded under this Policy. Axiata Group will not disclose the Reporter's identity to anyone else unless:
- (a) Axiata Group is legally obliged to disclose the Reporter's identity; or
 - (b) the disclosure is required if and when Axiata Group decides to report to the police, relevant regulatory bodies/authorities or the courts; or
 - (c) disclosure is necessary to prevent or lessen a threat to the Reporter's health, safety or welfare; or
 - (d) the Reporter gave his/her consent to the disclosure.

4. PROTECTION FROM RETALIATION

- 4.1 Axiata Group is committed to protect, within reason and means, anyone who reports or raises a concern in good faith, and those who participate in or conduct an investigation, from retaliation. Investigators will advise all parties who involved in the process of this commitment, and report any perceived retaliation based on participation in an investigation.
- 4.2 No party should retaliate against persons who reported the concerns as well as those who assisted in the investigations. Any person subjected to retaliation must file a new report using the same Speak Up channel by substantiating the retaliation claim with factual information or documentation. Any party regardless of designation, if proven guilty of retaliation against these persons, shall be subjected to disciplinary action.
- 4.3 If the person who reported the concern implicate his/her own conduct in the report, he/she will not be given immunity from investigation, disciplinary action, criminal prosecution and/or civil liability. The same applies to anyone assisting in an investigation. However, Axiata Group will take the disclosure and cooperation with the investigation into consideration when determining disciplinary or other actions.

5. PROCESSING OF CONCERNS RECEIVED

- 5.1 Concerns reported via the official Speak Up channel will be received by the Administrators of the Speak Up channel (comprised of Axiata's Group Chief Internal Auditor ("GCIA"), a staff member from Axiata's Group Investigations, a unit of Axiata's Group Internal Audit Division, and the Head of Internal Audit of the applicable Axiata company/subsidiary).
- 5.2 The Administrators of the Speak Up channel shall assess the concern based on the information provided by the Reporter such as nature of the concern, when and where did the alleged misconduct happened, details of the person(s) involved, witnesses, supporting evidences and other relevant information provided.
- 5.3 Employment related complaints or grievances shall be referred to the applicable Axiata Group's Human Resources Department to be addressed in accordance with their policies and procedures.
- 5.4 If the reported concern warrants an investigation, the Administrators of the Speak Up channel assign the reported concern to an Investigator to conduct the investigation in a fair, objective and confidential manner, within a reasonable period depending on the nature of the concern.
- 5.5 On completion of the investigation, a report shall be prepared and submitted to:
 - (a) the relevant stakeholders at the applicable Axiata company/subsidiary according to Axiata Group's speaking up/whistleblowing reporting governance matrix; and
 - (b) Axiata's GCIA and Axiata's Group Investigations.

- 5.6 Consequence management, including disciplinary actions, shall be meted out according to the applicable Axiata Group's Disciplinary Policy and Code of Conduct; documented and monitored. Where the findings of a case disclose a possible criminal offence, the case shall be escalated to the applicable Axiata company/subsidiary's Board of Audit Committee ("BAC") and Board of Directors for deliberation. The applicable Axiata company/subsidiary will report criminal matters to the police or relevant regulatory bodies/authorities if such reporting is required by the applicable law based on the results of the investigation.
- 5.7 The person who reported the concern will be updated on the status and/or progress of the investigation subject to Axiata Group's policies and procedures.
- 5.8 Details of all the concerns raised (investigated or not) shall be maintained. Respective status, reports, supporting documents, evidence, and monitoring of corrective action shall be retained and securely filed by the Administrators of the Speak Up channel, for a minimum period of retention according to the respective law at countries which Axiata Group operates.
- 5.9 Any leakages or exposure of the investigation results will be treated as a major misconduct and subject to disciplinary action, as stipulated in the applicable Axiata Group's Disciplinary Policy.

6. OVERSIGHT AND OWNERSHIP OF POLICY

- 6.1 Axiata's BAC has overall responsibility for this Policy and oversees the implementation of this Policy. Axiata's GCIA has the day-to-day responsibilities of administering and implementing this Policy directly reporting to the BAC. The use and effectiveness of this Policy shall be regularly monitored and reviewed by the GCIA.
- 6.2 The owner of this Policy is Axiata's GCIA who shall be responsible for incorporating any amendments and updates after obtaining the approval of the BAC for all amendments and updates and distributing the same to the relevant parties.