

Effective Date: 15 July 2021
Last Reviewed: 17 March 2022

Maybank Group Code of Ethics and Conduct Policy

MAYBANK GROUP CODE OF ETHICS AND CONDUCT

In addition to the Policy on Corporate Governance issued by BNM and the Company Directors' Code of Ethics established by the Companies Commission of Malaysia, the Group also has a Code of Ethics and Conduct that sets out the principles and standards of good practice in the financial services industry, to be observed by its employees, as well as Directors (Practice 3.1 of the Malaysian Code on Corporate Governance). The Board as well as the Group's employees are required to uphold the highest integrity in discharging their duties and in dealing with stakeholders, customers, fellow employees and regulators. This is in line with the Group's Core Values which emphasise behavioural ethics when dealing with third parties and fellow employees.

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OUR PURPOSE

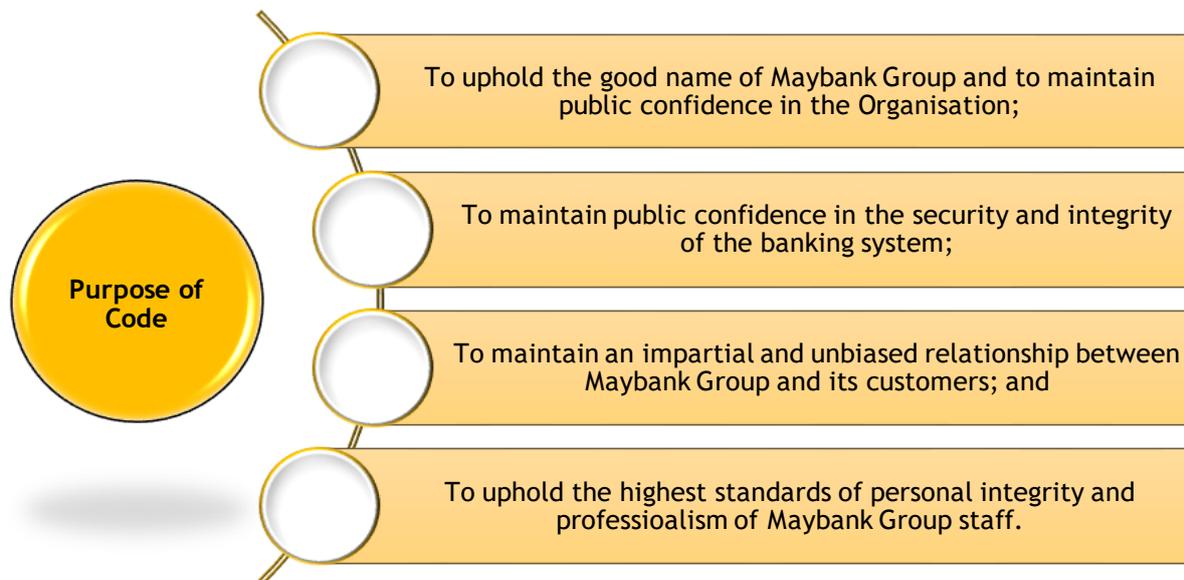
Maybank Group as a custodian of public funds has a responsibility to safeguard its integrity and credibility. We are here to help our clients, customers, investors and societies drive sustainable economic prosperity and social development by making a positive effect on them. This is necessary to preserve depositors' and investors' confidence in the business of the Bank.

As we know, the public places a very high level of trust and confidence on our staff especially those involved in higher responsibility. In fact, we owe this to our customers and it is everybody's responsibility to ensure that our Organisation is professionally managed and soundly based. Employees are expected to carry out business activities and represent the company with highest standards of conduct in letter and in spirit of the Code of Ethics.

As such, it is necessary to have documented ethical rules to be issued as guidelines in order to achieve such a level of conduct and behaviour for every employee.

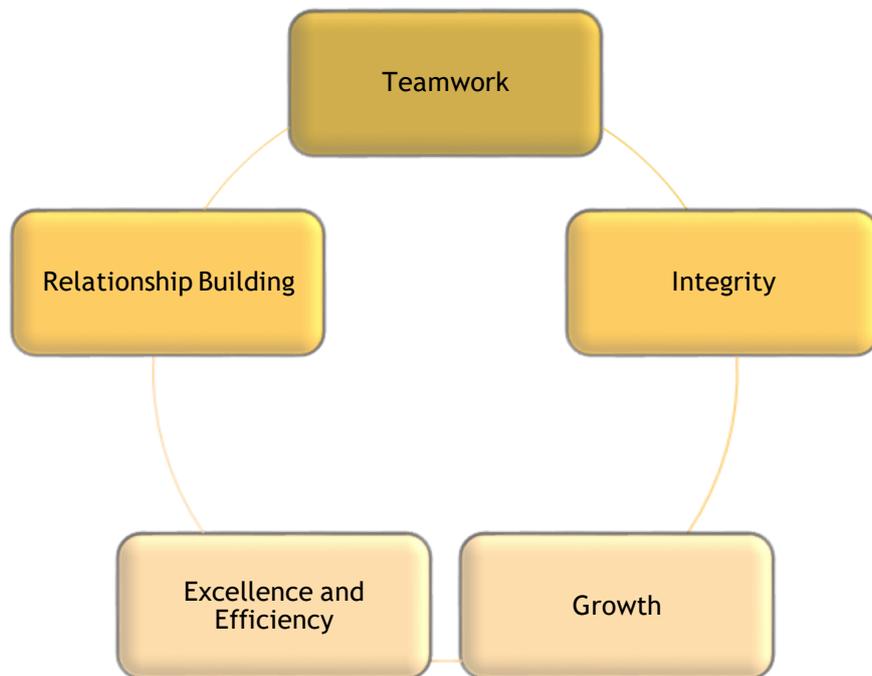
This Code of Ethics and Conduct of staff stipulates the sound principles that will guide all employees in Maybank Group in discharging their duties. It sets out the standards of good banking practice. We encourage collaboration, cooperation and inclusion, knowing that each of them will perform to the highest expectations.

Maybank Group adopts the principles set out in the Code of Ethics for the Financial Services Industry. All employees in Maybank Group are to discharge their duties in accordance with the principles set out herein.



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OUR VALUES



- T** **Teamwork** : Staff should always work together with one another. Strong teamwork boosts staff productivity, which makes them more efficient.
- I** **Integrity** : Staff should earn trust and loyalty of clients, stakeholders, communities and one another through behaving honestly and maintaining high ethical expectations.
- G** **Growth** : Staff must always build their strength and grow their skills as it better equips them for their role. It also adds more value to the work committed and benefits them as well as the Maybank Group.
- E** **Excellence and Efficiency** : Staff should exhibit excellence and efficiency at all times. Maybank Group is dedicated to creating sustainable value by balancing risks and returns responsibly and prioritising long-term success over short-term gain. We do this by implementing relevant and appropriate environmental, social and governance policies.
- R** **Relationship Building** : Staff should participate in open dialogue and strive to learn about them, not just with colleagues but also with clients, stakeholders and the wider community.

COVERAGE OF THE CODE

Who must follow the Code?

This Code of Ethics and Conduct (“the Code”) applies to all staff working in Maybank Group. The Code describes the expectations we have about everyone’s behaviour and acts. By committing to the Code, you are pledging to our purpose, values and belief. We view our priorities through the lens of our mission of ‘Humanising Financial Services’. Certain clauses will continue to apply to the staff even after they have ceased employment with Maybank Group.

For all countries in which Maybank Group operates in, this Code of Ethics and Conduct, where applicable, is to be read appropriately in accordance with the relevant legislations (if any), in the respective Countries. They are also required to refer to the Employee Guidelines/Handbook which governs their respective Countries and Business Operations.

All employees in Maybank Group are bound to observe all legislations which may have a more comprehensive coverage of the subject matters contained in this Code.

The provision of this Code is deemed to be part of the Terms and Conditions of Service for all employees.

Failure to follow the Code

When concerns emerge about a failure to operate within the Code’s boundaries, rest assured that all inquiries or decisions on staff discipline actions would be driven by our firm values of equal transparency. Failure to obey the Code would be taken very seriously by us and it may lead to disciplinary action. If any laws or rules have been violated, this process will include other officials.

1.0 CONFLICT OF INTEREST

Staff must not engage directly or indirectly in any business or activity that competes or conflicts with Maybank Group's interest. This Code, amongst others, identifies activities that may give rise to a conflict of interest and governs restrictions and manages risks associated with such activities. These activities include, but are not limited to the following:-

a. **Outside Financial Interest In Family Business or Company***

Where staff has an outside financial interest, whether or not in a customer, whether as a sole proprietor, partner, shareholder, creditor or debtor, such an interest must be disclosed immediately to the staff's immediate supervisor who in turn should report to the management. Thereafter, the staff should not be directly involved in Maybank Group's dealings with the customer so long as the interest continues to exist.

The written approval of the Group Chief Human Capital Officer or any other designated person appointed by management should be obtained prior or immediately upon being involved in any outside financial interest in a family business whether by way of acquisition of shares, interest or directorship. Approval may be granted only where the interest of the Maybank Group will not be prejudiced.

The criteria to be taken into consideration by the Group Chief Human Capital Officer or any other designated person when assessing a request under Clause 1(a) herein are set out in **Addendum A, Section 1**. **The conditions** that may be imposed by management when granting the approval are set out in **Addendum A, Section 2** hereto.

When a conflict of interest arises either between Maybank Group and its customers or between the staff and the customers and where such conflict is apparent, GHC Governance should be consulted. Upon prior consultation with GHC Governance, and should the conflict of interest continue to exist, supervisors should inform the customer of the apparent conflict of interest.

In assigning duties, supervisors should not place their subordinates in situations where conflict of interest could arise.

*These refer to shareholdings and may include directorships of a Non-Executive nature in a staff's family business or family owned private company.

b. **Other Financial Interest or Business Activity***

It is considered a conflict of interest if a staff conducts business other than Maybank Group's business during working hours.

Where the acquisition of any business interest (including shareholding) or participation in any business activity (including directorship) outside Maybank Group and working hours could demand excessive time and attention from the staff, thereby depriving Maybank Group of the staff's best effort on the job, a conflict of interest also arises.

The written approval of the Group Chief Human Capital Officer or any other designated person appointed by management should be obtained before the staff embarks on other business activities. Approval should be granted only where the interest of Maybank Group will not be prejudiced.

The criteria to be taken into consideration by the Group Chief Human Capital Officer or any other designated person appointed by management when assessing a request under Clause 1(b) herein are set out in **Addendum B, Section 1**. **The conditions** that may be imposed to the approval granted are contained in **Addendum B, Section 2** hereto.

The above restriction does not apply in cases where staff has holdings of publicly quoted

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securities unless the management considers the interest to be material, and the financial interest is considered likely to impair the objectivity of the staff concerned. In any case, holdings of five (5) percent or more of the voting shares of a public quoted company would be regarded as material.

*These refer to shareholdings and may include directorships of a Non-Executive nature in a private business or company.

c. Other Employment*

Before making any other employment commitment, staff is to discuss with management on possible part-time employment or other business activities outside the financial institution's working hours. The written approval of the Group Chief Human Capital Officer or any other designated person appointed by management should be obtained before the staff embarks on a part-time employment or other business activities. Approval should be granted only where the interest of Maybank Group will not be prejudiced.

The criteria to be taken into consideration by the Group Chief Human Capital Officer or any other designated person appointed by management when assessing a request under this paragraph are set out in **Addendum C, Section 1**. **The conditions** that may be imposed to the approval granted are contained in **Addendum C, Section 2** hereto.

*These refer to a contractual arrangement, where the staff commits to a part-time employment with an external employer, whether on a permanent or contract basis.

d. Corporate Directorship*

Staff must not solicit corporate directorship. A staff should not serve as a director of another public listed corporation without the approval of the Board of Directors. Employees who hold directorships without such approval must seek approval immediately, if they wish to remain as directors of other corporations.

Staff may also serve as a Corporate Director in other Financial Institutions or Non-Financial Institutions related Associations, Professional Bodies and Entities with the prior written approval from the Board of Directors.

The criteria to be taken into consideration by the Board of Directors, when assessing a request under this paragraph are contained in **Addendum D, Section 1** and **the conditions** that may be imposed are contained in **Addendum D, Section 2** hereto.

However, staff may act as directors of non-profit Public Service Corporations, such as religious, educational, cultural, social, welfare, philanthropic or charitable institutions with the prior written approval from the Group Chief Human Capital Officer or any other designated person appointed by management.

*These refer to Directorships in public listed corporations.

e. Active Affiliation with Political Parties

Maybank Group is politically neutral. Staff may only be involved in Political Parties as passive, ordinary members. Holding any office or having any form of active participation in Political Parties' activities is not permitted.

f. Entertainment & Gifts

Giving and receiving of gifts can affect or be seen to affect business judgment hence may give rise to a conflict of interest. In such circumstances employees are to strictly comply with the Maybank Group's Corporate Gifts and Entertainment Policy when it comes to receiving or giving of gifts and receiving or giving of entertainment to/from any third parties, including but not limited to the Maybank Group's customers, suppliers/vendors or consultants.

g. Credit Facilities

Staff should not approve credit facilities or any other transactions:-

- a. To themselves;
- b. To any of their family members; and
- c. To firms, companies or corporations in which they or their family have an interest.

Staff should not derive any improper benefits either in kind or in monetary at the expense of the Maybank Group or its customers.

Staff also should not obtain for themselves or any of their family members any property or any business advantage that properly belongs to the Maybank Group or to its customers.

h. Trusteeships

Staff must not solicit appointment as executors, administrators or trustees of the Maybank Group's customers' estates. If such an appointment is made and the staff is beneficiary of the estate, his signing authority for the estate's bank account(s) must be approved by the Board of Directors who will not unreasonably withhold approval.

This section of this policy must be read together with Section 4.7 of the Maybank Group Anti-Bribery & Corruption Policy and Section 7 of the Maybank Group Anti- Bribery & Corruption Procedure. Please also refer to the Addendum on Conflict of Interest.

2.0 MISUSE OF POSITION

- 2.1 Staff should not abuse their position in the Maybank Group to take advantage of any information obtained in the course of duty for personal benefit or for the benefit of other persons.
- 2.2 Staff should not make use of their position in the Group to solicit or receive favours from the Group's customers in exchange either for:-
- granting them banking facilities;
 - granting them favourable banking terms and conditions; or
 - deliberately not exercising due diligence on delinquent accounts for a favour.
- 2.3 Staff should not bribe customers when soliciting business. Corporate gifts offered or presented to customers on marketing trips and gifts offered for deposits are not considered examples of bribes.
- 2.4 Staff should not solicit the following from customers or other parties:-
- favours;
 - preferential or concessionary offers; or
 - gifts of any form, including cash, bonds, negotiable securities, personal loans, airline tickets, discounts or use of vacation or other entertainment facilities or property.
- 2.5 Staff should, whenever possible, discourage their customers and brokers from offering them personal gifts, favours or services.
- 2.6 Staff should not make use of their position in the Maybank Group:-
- a. To solicit corporate directorships from the Maybank Group's customers, unless the member of staff is appointed to the Board to represent the Maybank Group's interest; or
 - b. To borrow from or become indebted to these customers.
- 2.7 It is the duty of all staff to ensure that no other staff in the Maybank Group should misuse his or her position in the Maybank Group. Staff who are aware of any such irregularities in the course of their work owes a duty to report such irregularities in confidence to the Maybank Group.
- 2.8 Staff must not use the Maybank Group's name or facilities for personal advantage in political, investment or retail purchasing transaction, or in similar types of activities. Staff and their relatives, must not use their connections with the Maybank Group to borrow from or become indebted to customers or prospective customers. The use of position to obtain preferential treatment, such as in purchasing goods, shares and other securities, is strictly prohibited.
- 2.9 Further, staff must not use the Maybank Group's facilities and influence for speculating in commodities, gold, silver, foreign exchange or securities, whether acting personally or on behalf of friends or relatives. Such misuse of position may be grounds for dismissal. Staff should also not provide mutually beneficial transactions to staff of other institutions in return for similar facilities designed to circumvent the provisions contained in this Code.

Note: Under this clause, reference to 'customers' wherever it appears also include reference to 'vendors/suppliers of goods and services'.

3.0 MISUSE OF INFORMATION

- 3.1 Staff should not copy, remove or make use of any information obtained in the course of business for the direct or indirect benefit of themselves or of any other persons.
- 3.2 It is regarded as a misuse of such information if a staff uses information of the Maybank Group or customers to benefit themselves or confer an advantage on themselves or any other persons.
- 3.3 Staff in possession of confidential information should not use it in the following ways for the benefit of themselves or any other persons:-
 - a. To influence any customer or any third party in dealing in any transaction; or
 - b. To communicate such information to any customer.
- 3.4 The above prohibitions relating to the misuse of information continues even after the staff ceases to be employed by the Maybank Group.
- 3.5 Staff in one division, department or branch should not retrieve or obtain information of the Group or customer from another division, department or branch unless the information so received is necessary in their course of work. Any transmission or transfer of information among the divisions, department or branches should be properly authorized.
- 3.6 Staff shall not deal in securities of any company listed or pending listing on a stock exchange at any time when he is in possession of information, obtained as a result of his employment by, or his connection with the Maybank Group which is not generally available to shareholders of that company and the public, and which, if it was so available, would likely bring about a material change in the market price of shares or other securities of the company concerned.
- 3.7 A staff who possesses insider information is also prohibited from influencing any other person to deal in the securities concerned or communicating such information to any other person, including other staff who do not require such information in discharging their duty.

4.0 INTEGRITY AND ACCURACY OF RECORDS / TRANSACTIONS

- 4.1 Staff should ensure that accurate and complete records of the Maybank Group's operations are kept and maintained in such a form and for such a period as determined by the Maybank Group. These records include the following:-
- i. Books, slips, documents, statement;
 - ii. Computer tapes and diskettes;
 - iii. Computer programmes;
 - iv. Microfiches/microfilms; and
 - v. Computer print-outs.
- 4.2 Staff should never make entries or allow entries to be made for any account, record or document of the Maybank Group that are false or would obscure the true nature of the transactions as well as to mislead the true authorization limits or approval by the relevant authority of such transactions.
- 4.3 Staff should ensure that any alteration or deletion to records is properly authorized by their superiors. Any removal of records must also be properly documented.
- 4.4 Staff must ensure that Maybank Group's information and records are not copied by unauthorised persons including computer vendors.
- 4.5 Staff should report to their superior immediately upon discovery of any unauthorised copying, entries, deletions or alterations in the Maybank Group's records.
- 4.6 All records and computer files or programs of the Maybank Group, including personnel files, financial statements and customer information, must be accessed and used only for the management-approved purposes for which they were originally intended.
- 4.7 Staff of each country in which the Maybank Group operates in should refer to their local laws and regulation which governs their respective countries on the provisions that provide for criminal penalties against any director, manager, trustee, auditor, employee or agent of a licensed bank who is guilty of willfully making a false entry or omitting, altering, abstracting, concealing or destroying any entry in the Bank's books of record, reports or documents.

5.0 FAIR AND EQUITABLE TREATMENT

- 5.1 All business dealings on behalf of the Maybank Group with current and potential customers, with other members of the staff and with all those who may have caused to rely upon the Maybank Group, should be conducted fairly and equitably. Staff must not be influenced fairly by friendship or association, either in meeting a customer's requirements or in recommending that they be met. Such decisions must be made on a strictly arm-length business basis. All preferential transactions with insiders or related interest should be avoided. If transacted, such dealings should be in full compliance with the law, judging on normal business criteria basis and fully documented and duly authorized by the Board of Directors or an independent party.
- 5.2 No member of staff shall offer any bribe or similar consideration to any person or company in order to obtain business for the Maybank Group. Any commissions paid or other payments made, or favorable terms conceded, or other advantages given, by any staff member in the conduct of the Maybank Group's business shall be in accordance with the Maybank Group's policies on such matters as notified from time to time and shall be promptly recorded in writing.

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6.0 RELATIONSHIP WITH CUSTOMERS

- 6.1 Staff should draw customers' attention to the terms and conditions governing each banking service provided, including all applicable bank charges.
- 6.2 Staff should respond readily and promptly to customers' enquiries on the Bank's terms and conditions of banking services including bank charges.
- 6.3 For matters of abnormal or of suspected abnormal nature in a Branch/Department (such as fraud/defalcation, robbery/theft, cash discrepancy and loss of important document), the Branch Manager or Head of Unit/Sector should immediately inform Group Chief Audit Executive and their respective Country Head giving all the information required in the format specified by the Maybank Group.
- 6.4 Branch should report all customer complaints promptly to the Group Corporate Affairs and copy to Group Chief Human Capital Officer and Group Audit.

7.0 CONFIDENTIALITY

- 7.1 The confidentiality of relations and dealings between the Maybank Group and its customers is paramount in maintaining the Maybank Group's reputation. Staff is required to keep confidential on all information relating to the Maybank Group's customers including information regarding their accounts and transactions. Employee who resides in countries where the Personal Data Protection Act (PDPA) has been enforced should always abide by this Act.
- 7.2 Staff should not remove or relocate documents or records of customers out of their divisions/departments/branches without the prior approval of their respective managers or department heads.
- 7.3 Staff has a duty to continue protecting the confidentiality of customer information even after cessation of employment with the Maybank Group and except with the Maybank Group's consent, staff shall not divulge or to make use of any secret, copyright material or any correspondence, accounts or dealings of the Maybank Group or its customers. No staff shall in any way use information so obtained for financial gain.
- 7.4 Staff should not reveal to third parties any names or other information in connection with any dealings or transactions with any customer.
- 7.5 Confidential information concerning a customer may be given or made available to third parties only with prior written consent of the customer, when disclosure is authorized under any laws and regulations of respective countries to be made to a police officer investigating into an offence specified in such law, regulations and other permitted disclosures.

8.0 MAKING PUBLIC STATEMENTS

- 8.1 All staff shall not, during or after termination of his employment with the Maybank Group:-
- Publish or cause to be published or circulate any articles, statements, books, photographs or letters; and/or
 - Give away any interview or broadcast or deliver any lectures or speeches on any matter which concerns his duties or the policies, decisions or the business of the Maybank Group or any matter connected with the Maybank Group without obtaining the prior written consent of the Maybank Group.
- 8.2 For making public statements, the following designated posts are exempted from seeking written permission from the Group if the act is in line with the discharge of official duties of the staff:-
- Chairman;
 - Vice Chairman;
 - Group President & CEO;
 - Group EXCO Member;
 - Executive Director; and
 - Any spokesmen or persons so designated by the Chairman/Vice Chairman or Group President & CEO or Group EXCO to do so.
 - If permission is granted, it shall be subjected to an implied condition that:-
 - a. The proposed publication shall not be published as may reasonably be implied that it had received official support or backing or sponsorship from the Group; or
 - b. The proposed publication shall not bear the words “approved publication” or words to that effect.
- 8.3 Staff wishing to seek permission to publish or write a book or article based on official information must write to the Group Chief Human Capital Officer or any other designated persons, giving details of the proposed publishing of the book or the article.

9.0 SOCIAL MEDIA USAGE

- 9.1 When using social media such as, but not limited to, personal blogs, social media including but not limited to Facebook or Twitter, employees are to be mindful that they do not disclose confidential information about the Maybank Group's business, its customers and all other matters related to the Maybank Group. Employees are not authorized to make any commentaries on behalf of the Maybank Group and especially those that would adversely affect the image and reputation of the Maybank Group. Employees are prohibited from using/editing the Maybank Group's logos, pictorial images related to the Maybank Group and trademarks in their own personal social media accounts. Further, employees are required to comply with the Maybank Group's Social Media Usage Policy, Social Media Guidelines, IT Policy on Usage of Internet and IT Policy on Usage of Email when using social media.

10.0 INTEGRITY OF THE BANKING SYSTEM

- 10.1 Staff has the duty to protect the integrity of the banking system. They should not lend themselves to any scheme which could subvert the integrity of the banking system.
- 10.2 Staff should be vigilant against any attempt to use the Bank for illegal purpose or activity, in particular money laundering and terrorism financing.
- 10.3 To prevent the misuse of the banking system and facilities for illegal purposes, staff should satisfy themselves on the identity of persons seeking to open an account or a safe deposit box by verifying their identification documents such as identity card or passport.
- 10.4 Staff should follow strictly the Bank's procedures relevant to each particular transaction. These procedures include verification of customers' identities and assessing customers' honesty, integrity, commercial ability and creditworthiness. The extent of the verification will be in accordance to the banking facilities sought by the customers and the duties prescribed for the staff who attends to the customers.
- 10.5 When a staff suspects that a prospective customer may be involved in illegal activities, the staff should decline to open any account for the customer or provide any other banking service and report to his/her immediate superior.
- 10.6 When an account has already been opened, the staff should inform his/her superior immediately, who should seek the closure of the account as soon as possible as permitted by any contractual and statutory obligations to the customers.

All events such as those in Clause 10.5 above should be properly documented.

11.0 REQUIRED KNOWLEDGE AND COMPLIANCE

- 11.1 Staff, particularly at the senior level, should keep up-to-date with and comply the applicable laws, rules and regulations in their respective area of operations.
- 11.2 Line Managers are required to take reasonable steps to ensure that their subordinates are kept informed of and are familiar with all applicable laws or regulations relevant to their respective operations. They should up-date their subordinates on any change in such laws or regulations.
- 11.3 Staff who are not familiar with the laws and regulations applicable in their area of operations should seek guidance from their immediate superior.

12.0 PECUNIARY EMBARRASSMENT

- 12.1 Staff is expected to manage their financial matters well. Maybank Group takes a very serious view such "pecuniary embarrassment" i. e. the state of one's indebtedness.
- 12.2 Staff is deemed to be in state of pecuniary embarrassment:-
- a. Where he is a judgment debtor, for as long as the judgment debt remains unsettled and astay of execution has not been granted; or
 - b. Where he is a bankrupt or an insolvent wage earner, for as long as he remains as an undischarged bankrupt or for as long as any judgment against him in favour of the official assignee remains unsatisfied and a stay of execution has not been granted.

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13.0 AVENUE TO EXPRESS VIEWPOINT OR COMPLAINT

- 13.1 Staff may express their viewpoint or their complaint on any matter or person with the Maybank Group's interest at heart direct to the Group Chief Human Capital Officer in writing.

14.0 PROHIBITED CONDUCT OF PERSON IN POSSESSION OF INSIDE INFORMATION

- 14.1 The Bank and its staff should observe all provisions contained in this Code and in addition to the requirements of respective laws and regulation in each country that prohibits any person from using **inside** information to:

- acquire or dispose of, or enter into an agreement for or with a view to acquire or dispose such securities; or
- procure, directly or indirectly, an acquisition or disposal of, or the entering into an agreement for or with a view to the acquire or dispose of such securities.

- 14.2 A person is an “insider” if that person:-

- possesses information that is not generally available which on becoming generally available a reasonable person would expect it to have a material effect on the price or the value of securities; and
- knows or ought reasonably to know the above.

15.0 MONEY LAUNDERING AND TERRORISM FINANCING

- 15.1 Money Laundering is the process by which one conceals funds of dubious or illegal origin and then disguises them as legitimate proceeds of lawful activities.

- 15.2 All employees must abide by the respective countries laws and regulation pertaining to the Anti-Money Laundering which provides for the offence of money laundering, the measures to be taken for the prevention of money laundering and terrorism financing offences and to provide for the forfeiture of terrorist property and property involved in, or derived from, money laundering and terrorism financing offences, and for matters incidental thereto and connected therewith.

16.0 COMPUTER CRIMES

16.1 All employees need to abide with their respective laws and regulation on computer crimes Four (4) main offences relating to misuse of computers as stated below:-

- Hacking and unauthorized access to computer material;
- Unauthorized modification of the contents of the Maybank Group's computers;
- Unauthorized communication directly or indirectly of a number, code, password or other means of access to the Maybank Group's computers; and
- Abetment and attempts to commit the offences described above.

17.0 SEXUAL HARRASSMENT

17.1 Every employee is entitled to work in a safe and conducive environment. The company views sexual harassment as a serious offence and appropriate action will be taken against any staff found guilty of committing the offence. Examples of sexual harassment:

- Jokes of a sexual nature;
- Touching or any bodily contact;
- Repeated requests for dates;
- Transmitting e-mails or pictures of a sexual nature; and
- Displaying picture, objects of a sexual nature.

All incidences of sexual harassment must be reported to Group Human Capital for further investigation. Countries are required to adopt the spirit of this provision into their respective local policies. Countries are to ensure that their local laws and regulations in respect of sexual harassment are observed.

18.0 DRESS CODE

All staff are to ensure that they abide by the Maybank Group's dress code sets the standard for our professional and business image - what is appropriate and not appropriate for work; so that everyone would have a clearer picture be it business formal (that is applicable from Monday to Thursday) or business casual ("dress down" Friday).

19.0 MISCELLANEOUS

Addendums and/or Appendices to this Policy are for guidance only and may be reviewed, amended and/or updated by Group Industrial Relations, Risk & Governance from time to time as deemed fit, with the approval of Group Chief Human Capital Officer.

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**ADDENDUM 1 TO MAYBANK GROUP
CODE OF ETHICS AND CONDUCT
POLICY**

**CONFLICT OF
INTEREST**

| | |
|-------------------------------|---|
| Addendum No: | 01/2020 |
| Policy Name: | Future Ready Code of Ethics and Conduct Policy |
| Policy Effective Date: | 15 July 2020 |
| Policy Last Reviewed: | 17 March 2022 |
| Policy Owner: | Group Industrial Relations, Risk & Governance |
| Status: | Active |
| Contact Office: | Governance, Group Human Capital |
| Classification: | Maybank Group use only |
| Purpose: | <p>The purpose of this addendum is to enable the Maybank Group manage conflict of interests effectively to avoid legal and reputational risks and to protect the reputation of the Bank and the personal integrity of the staff.</p> <p>The criteria and conditions for managing the business and personal conflict of interest positions set out in Section 1.0 of the Code of Ethics namely Outside Financial Interest, Other Business Interest, Other Employment and Corporate Directorship are stated herein.</p> <p>Please note that the criteria and conditions herein are non-exhaustive and may be reviewed and updated accordingly by GHC Governance with the approval of Group Chief Human Capital Officer.</p> |
| Policy Statement: | <p>Staff must not engage directly or indirectly in any business or activity that competes or conflicts with Maybank Group's interest. This Code, amongst others, identifies activities that may give rise to a conflict of interest and governs restrictions and manages risks associated with such activities.</p> |

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ADDENDUM A

SECTION 1 Criteria - Outside Financial Interest in Family Business

The criteria to be taken into consideration when determining whether a staff may be granted approval to hold a **directorship or shares in Family Owned Business or Private Companies**, are as follows:

1.0 The Business must be family owned

- 1.1 The business or company must be owned by the family members of the staff. The staff must provide relevant documentary evidence such as a company search and relationship documents.

2.0 No Competition with the Business of Maybank Group

- 2.1 The nature of the family business must not compete with the nature of Maybank Group's business. For example, the family business should not be involved in any type of financial services such as lending money or any investment activities such as shares, bonds, trusts and REITs.

3.0 No adverse harmful impact to Maybank Group's Reputation

- 3.1 The involvement in the said business would not adversely impact Maybank Group's reputation. Approval will not be granted, for example, if the family business is involved in activities that are not in accordance with the core values of Maybank, including but not limited to ethical environmental, social or governance values and practices.

4.0 The involvement must not impair objectivity and/or productivity

4.1 Directorship in a Family Owned Business or Private Companies

- Management will not grant approval for a staff to accept an executive directorship in a family owned business or company as this is deemed to impair the objectivity of the staff.
- Management may grant approval to a staff to accept a Non-Executive directorship in a family owned dormant companies, if the purpose is to facilitate the closure of the company.
- Management may grant approval to a staff to accept a Non-Executive directorship(s) if it is part of an inheritance or anticipated inheritance or for continuity of a family business. For example, if a parent is retiring as a director and the child has been asked to accept a Non-Executive directorship in the said company so as to enable the family to continue to have an interest in the said company.

4.2 Shareholding in a Family Owned Business or Private Companies

- Generally, a controlling shareholding in a family owned business or private company, may be deemed as a material involvement that may impair the objectivity and/or productivity of the staff.

4.3 Other Involvement in Family Owned Business or Private Companies

- When assessing a request, management should consider, based on the request whether any other involvement by the staff could impair the staff's productivity at work with the Bank (e.g. if such involvement would conflict with the interest of the Bank's working hours).

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ADDENDUM A

SECTION 2 Conditions - Outside Financial Interest in Family Business

Directorships

- (1) Staff is to give priority to the Bank at all times.
- (2) Staff is required to maintain confidentiality of all sensitive information relating to the Bank and be guided by the Bank's Code of Ethics and Conduct.
- (3) Staff's involvement is solely on his/her personal capacity and not as a representative of Maybank.
- (4) Staff must uphold the good name of Maybank.
- (5) Staff are allowed to retain the director fees earned from the said directorship.
- (6) Staff are required to undertake that Bank's resources will not be used to support their directorship or their outside involvement.
- (7) Any change to the Directorship or other related matters such as but not limited, to the nature of business or ownership of the said company (if any), the staff is required to disclose, update and declare the same to GHC Governance within seven (7) working days from effective date of the said change at the latest. Should the staff become aware of such impending change earlier, the staff is required to inform and consult GHC Governance immediately, prior to such change being affected.
- (8) The conditional approval is subject to, at minimum, an annual review to ensure that the interests of the Bank is preserved and the approval can be revoked at any time, without prior notice at the sole discretion of the Bank.
- (9) Staff is reminded that any breach of the conditions imposed by the Bank may be subjected to disciplinary proceedings, including termination of employment with Maybank.

Shareholdings

- (1) Staff are allowed to retain any dividends declared and earned on shares that have been offered/purchased by the staff in their capacity as a corporate director.
- (2) Any change to the shareholdings (if any), the staff is required to disclose, update and declare the same to GHC Governance within seven (7) working days from effective date of the said change at the latest.

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ADDENDUM B

SECTION 1 Criteria - Other Financial Interest or Business Activity

In considering a request for involvement in other business, the Bank will take into consideration factors which include but not limited to:-

1.0 No Competition with the Business of Maybank Group

The nature of the business must not compete with the nature of Maybank Group's business.

2.0 No adverse impact to Maybank Group's Reputation

The involvement in the said business would not adversely impact Maybank Group's reputation. For example, if the business is involved in unlicensed or illegal activities then approval will not be granted.

3.0 The impact of the involvement to Maybank Group's Reputation

Management may take into consideration the nature of the involvement, that is, whether involvement is in non-profit activities such as but not limited to residents' associations and/or volunteer work for government/charity/non-government organisations.

4.0 The involvement must not impair objectivity and/or productivity

- (a) Whether there is a material interest in terms of the percentage of shareholdings or an investment in terms of funding the business; or
- (b) working hours demand time and attention from the staff, to an extent that may deprive Maybank Group of the staff's best effort on the job; and
- (c) Whether the staff is working on a Flexible Work Arrangement.
- (d) The position/role of the staff in the other business i.e. director or shareholder, must not distract staff.

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ADDENDUM B

SECTION 2 Conditions - Other Financial Interest or Business Activity

1. Staff are not allowed to promote the business among Bank staff and customers directly or indirectly;
2. Staff are required to declare on an annual basis the status of his/her involvement in the business and update the changes of the said companies (if any);
3. Staff are to undertake to relinquish his/her business interest when he/she commences work after sabbatical leave (if approval is granted during his/her sabbatical leave);
4. Staff must maintain confidentiality of all sensitive information relating to the Bank and strictly adhere to the Bank's Code of Ethics & Conduct.
5. Staff may be granted approval to retain the remuneration earned from the other business activity.
6. Staff is to give priority to the Bank at all times.
7. Staff will be required to take an undertaking to the Bank that he/she will not to carry out his/her business activities during office hours.

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ADDENDUM C

SECTION 1 Criteria - Other Employment

In considering a request for involvement in other employment, the Bank will take into consideration factors which include but not limited to:-

1.0 No Competition with the Business of Maybank Group

- (a) The nature of the business must not compete with the nature of Maybank Group's business.

2.0 No adverse impact to Maybank Group's Reputation

The part-time employment should not adversely impact Maybank Group's reputation. Approval will not be granted, for example, if the part-time employment is involved in activities that are not in accordance with the core values of Maybank, including but not limited to unethical environmental, social or governance values and practices.

3.0 The involvement must not impair objectivity and/or productivity

Management will also take into consideration the following factors when assessing whether the involvement will impair objectivity and/or productivity:-

- (a) The demand of the part-time employment on the staff, the type of position or part-time role or total number of hours and days. In this regard, management will assess the nature of the part-time employment or other employment, to determine if the said employment will adversely impact the productivity of the staff.

For example, conditional approval may be granted for part-time employment such as tuition teacher, part-time Grab driver, assistant in a vegetable stall, musician or part-time master of ceremonies.

- (b) The type of working arrangement that the staff currently has with Maybank Group (e.g. Flexible Work Arrangement).

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ADDENDUM C

SECTION 2 Conditions - Other Employment

1. Staff are not allowed to promote the business among Bank staff and customers directly or indirectly;
2. Staff are required to declare on an annual basis the status of his/her involvement in the business and update the changes of the said companies (if any);
3. Staff are to undertake to relinquish his/her business interest when he/she commences work after sabbatical leave (if approval is granted during his/her sabbatical leave);
4. Staff must maintain confidentiality of all sensitive information relating to the Bank and strictly adhere to the Bank's Code of Ethics & Conduct.
5. The approval is for staff to do part-time business after office hours only and only at specified timing in some cases.
6. Staff may be granted approval to retain the remuneration earned from the said part-time job.
7. If application is to be a part-time insurance agent, the staff is bound by the terms and condition stated in the agency contract as well as the industry code of ethics. Staff will not be allowed to be in full time employment with the Bank;
8. Staff is to give priority to the Bank at all times; and
9. Staff will be required to take an undertaking to the Bank that he/she will not to carry out his/her business activities during office hours.

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ADDENDUM D

SECTION 1 Criteria - Corporate Directorship*

When considering a request of this nature, management and the Board may be guided by the following criteria:-

1.0 The involvement/Interest must not impair objectivity and/productivity

- 1.1 Corporate Directorships may be given consideration unless the Board considers the interest to be material, and/or likely to impair the objectivity and/or productivity of the staff concerned. For this purpose, executive directorships are considered material.

2.0 No Competition with the Business of Maybank Group

- 2.1 The nature of the business must not compete with the nature of Maybank Group's business. The concept of "competitor" includes financial services firms and others engaged in any industry we are involved in (even if not in direct competition with our Company), are considered rivals, including banks, fund managers, depository institutions, credit unions, brokers, dealers and underwriters. For example, the business should not be involved in any type of financial services such as lending money or any investment activities such as shares, bonds, trusts and REITs.

3.0 Non-Family Controlled Listed Company

- 3.1 The Board may grant approval to accept a Corporate Directorship that is offered to a staff in a non-family controlled Listed Company, by virtue of the staff being an industry expert or their position in Maybank; or to meet Maybank's operational needs.

4.0 Family Controlled Listed Companies

- 4.1 The directorship is given as part of an inheritance or anticipated inheritance or for continuity of a family business.

5.0 Impact to Maybank Group's Reputation

- 5.1 Staff may be granted conditional approval to accept directorships which would build or complement Maybank Group's reputation, as a leading employer and/or leader in financial services.
- 5.2 Approval will not be granted, for example, if the business is involved in activities that are not in accordance with the core values of Maybank, including but not limited to unethical environmental, social or governance values and practices.

6.0 Development Purposes

- 6.1 Staff may be granted conditional approval to accept a Directorship(s) which is intended:-
 - (a) for development purposes of the staff concerned such as the women agenda and to contribute to the national agenda of building a pool of directors;
 - (b) Directorship(s) which enable the staff to obtain experience as a Corporate Director for their career growth; or
 - (c) Directorships which promote national or Maybank Group's agenda, such as diversity and inclusivity.

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7.0 Eligibility

Corporate Directorship request from senior management staff

- (i) Employees who are in benefit grade Band C and above (or equivalent); or
- (ii) Employees who are in benefit grade Band E and above (or equivalent), they must be 50 years old and above.

The Bank reserves the sole discretion at all times to impose fair and reasonable conditions as deemed fit to protect the interest of the Bank and the staff involved in the same. A non-exhaustive list of conditions that may be imposed by management are as set out in this Code and our internal process flow.

8.0 Governance

All request pertaining to Corporate Directorship must be routed to GHC Governance for assessment before the said request is submitted to the Group Board of Directors for consideration and approval.

Generally, the approval for an acceptance of a Corporate Directorship in other corporations is to be approved by the Board of Directors**. Employees who hold directorships without such approval must seek approval immediately, if they wish so to remain as directors of other corporations.

*These refer to Directorships in public listed corporations.

**Board of Directors refers to the Group Board of Directors if the staff is an employee of Maybank Group and the respective subsidiary/entities Board of Directors if the staff is an employee of a subsidiary.

It is also to be noted that if an incumbent of a position identified as Material Risk Taker or Other Material Risk Taker at the respective subsidiaries/entities makes a request to accept a corporate directorship, the said request is to be tabled for approval at the respective Board and subsequently the Maybank Group Board of Directors be informed of said approval granted as Maybank Group Board of Directors govern over the Fitness and Probity of the Group's Material Risk Takers and Other Material Risk Takers.

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ADDENDUM D

SECTION 2 Conditions - Corporate Directorship*

a) **Bank's Interest to be Prioritised**

As employees of the Bank, staff are to give first priority to the Bank's interests at all the times.

b) **Use of Bank's Resources Forbidden**

Staff are required to undertake that Bank's resources will not be used to support their corporate directorship or their outside involvement, this includes but is not limited to activities related to fundraising, identification of opportunities relevant to the focus areas of the company that has offered them the corporate directorship.

c) **Staff's Vigilance on conflict of interest**

Staff must not put themselves in any position or act in any manner whereby actual or perceived conflict of interest may arise.

d) **Confidentiality of Proprietary Information**

Staff are required to undertake that staff shall not use any proprietary information, whether within their knowledge possession currently or otherwise, for the benefit of the company in which they have been appointed as a corporate director, the staff themselves and/or to the detriment of Maybank.

e) **No Management/operational involvement**

Staff are not allowed to be involved directly or indirectly in any manner whatsoever in the management and/or operations of company in which they have been granted approval to be a corporate director.

f) **No involvement in Maybank business with the company**

Staff are to abstain from being involved in advising existing and potential Maybank clients/customers on any investments relating to the company in which they have a corporate directorship. All matters relating to any financing relating to the said company will be in accordance to our policy on financing to connected parties.

g) **Adequate Training**

For staff who are granted approval to hold a corporate directorship, staff are required to attend training on directorship (for example, training programmes such as Core Module Program conducted by FIDE), which will be facilitated by Maybank, within a reasonable period of time. The cost of the training may be borne by Maybank as part of the staff's career development. This will be decided by management taking into consideration all surrounding facts of each request.

h) **Fees and Allowances**

Staff are allowed to retain the director fees and meeting allowances.

i) **Dividend on Shares**

Staff are allowed to retain the dividends earned from their shareholdings in the Company.

j) **Utilisation of Annual Leave**

Staff will be required to utilise their annual leave when attending to any matters relating to the duties and responsibilities as a corporate director.

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k) Credit Approvals Escalated to Maybank Group Board

If the staff is a member of the Board of the public listed Company, all credit approvals for the said company will now be escalated for approval and endorsement to Maybank Group Board of Directors.

l) No Public Statements on behalf of Maybank Group

Staff are to ensure that they will not represent themselves as a staff of Maybank when making any media or public statements on behalf of the other company. Such statements must be made in their individual capacity as a director of the said company.

m) Safeguard Maybank's Reputation

Staff are required to ensure that they protect the reputation and image of Maybank at all material times, and in the event staff are made aware of any findings relating to the company that may have a material adverse effect on the Company, or the staff, then the staff is required to immediately resign from their position as director and take the necessary steps to protect the interests of Maybank and themselves. Should the staff become aware of any findings, the staff is required to inform and consult GHC Governance immediately.

n) Change in Interest/Involvement

Any change to the Corporate Directorship or shareholdings or other related matters such as but not limited, to the nature of business or ownership of the said company (if any), the staff is required to disclose, update and declare the same to GHC Governance within seven (7) working days from effective date of the said change at the latest. Should the staff become aware of such impending change earlier, the staff is required to inform and consult GHC Governance immediately, prior to such change being affected.

o) Confidentiality

Staff are to maintain confidentiality of all sensitive information relating to the Bank and be guided by the Bank's Code of Ethics and Conduct at all times.

p) Consequence on Breach of Conditions

Staff are reminded that any breach of the conditions imposed by the Bank herein may be subjected to disciplinary proceedings, including termination of employment with Maybank.

q) Approval subject to Review

The conditional approval is subject to, at minimum, an annual review to ensure that the interests of the Bank is preserved and the approval can be revoked at any time, without prior notice at the sole discretion of the Bank.

r) Company's Board to be informed of Approval Conditions

For good governance, staff with corporate directorships shall provide Maybank with confirmation that the Board of Directors of the Company have been informed and have taken cognizance of all the conditions set out herein.

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**ADDENDUM 2 TO MAYBANK GROUP
CODE OF ETHICS AND CONDUCT
POLICY**

Handling
Mental
Health-
Related
Cases

| | |
|-------------------------------|--|
| Addendum No: | 02/2021 |
| Policy Name: | Maybank Group's Code of Ethics and Conduct Policy |
| Policy Effective Date: | 15 July 2021 |
| Policy Last Reviewed: | 17 March 2022 |
| Policy Owner: | Group Industrial Relations, Risk & Governance |
| Status: | Active |
| Contact Office: | Governance, Group Human Capital |
| Classification: | Maybank Group use only |
| Purpose: | <p>The purpose of this addendum is to enable the Maybank Group handle Mental Health-related cases effectively to:-</p> <ol style="list-style-type: none"> 1. Uphold the good name of the Maybank Group and maintain public confidence in the Organisation by prioritising the mental health of its employees; 2. Maintain good relationship among employees at all levels; 3. Uphold the high standards of personal integrity and professionalism of the Maybank Group employees; and 4. Ensure that all employees of Maybank Group have access to secure channels when seeking mental health support within Maybank Group and comply with the Maybank Group's FutureReady Code of Ethics and Conduct. |
| Policy Statement: | <p>The Code of Ethics and Conduct Policy for Handling Mental Health-related Cases (the Code) should be applied in conjunction with the Maybank Group's Code of Ethics and Conduct Policy. This Code of Ethics and Conduct for Handling Mental Health-related Cases sets out the guidelines to assist support providers in discharging their duties related to mental health. Support providers in this context are employees of Maybank Group who provide support to other employees on mental health-related matters.</p> |

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Coverage of the Code

- The Code is applicable to the designated support providers¹ attending to Mental Health-related cases of Maybank Group employees either through in-person meetings and/or via telephone calls.
- Certain clauses will continue to apply to the support providers even after they have ceased employment with Maybank Group.

Note:

¹ Support providers here are referring to Group Human Capital (GHC) staff and any Maybank Group employees who have undergone relevant trainings in mental health support.

The criteria to be taken into consideration when handling Mental Health-related cases are as follows:

1.0 No Conflict of Interest

- 1.1 Should the support providers receive cases in which there is a potential conflict of interest with the affected employee, the support provider is required to tactfully hand the case over to an independent party i.e. another support provider.

2.0 Misuse of Position

- 2.1 Support providers should not abuse their position by taking advantage of information obtained in the course of duty for their personal benefit or for the benefit of other persons.
- 2.2 Support providers should not solicit any personal information from the employee.
- 2.3 It is the duty of all support providers in Maybank Group to ensure that there is no misuse of one's position as a support provider. Support providers who are aware of any such irregularities in the course of their work owe a duty to report such irregularities to the Group Human Chief Capital Officer (GCHCO), Maybank Group in strict confidence.
- 2.4 In their role as support providers, they are in a position of power and trust, and as such support providers are not to condone or participate in any dishonest activities, or intentional misrepresentation of facts.

3.0 Misuse of Information

- 3.1 Support providers are not to:
 - Copy, remove or make use of any information obtained in the course of mental health dealings for the direct or indirect benefit of themselves or of any other persons;
 - Misuse information of the employee obtained in the course of duty to benefit themselves or confer an advantage on themselves or any other persons; and
 - Exploit the employee's vulnerability.

4.0 Integrity and Accuracy of Records

- 4.1 Support providers should ensure that the employee's Mental Health information are correctly recorded and submitted to authorised parties only.
- 4.2 Support providers should never make or report any misleading or false information.
- 4.3 Records must be kept and maintained in such a form and for such a period as determined by Maybank Group records retention policy.
- 4.4 All Mental Health records or case information must be accessed and used only for the management-approved purposes for which they were originally intended.

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5.0 Commitment to Staff

5.1 Support providers are to:

- Respond readily and promptly to mental health enquiries raised by employees;
- Provide the most appropriate assistance or advice to employees;
- Respect the essential human rights and dignity of every employee;
- Always treat the employees with respect and dignity;
- Expend discretionary efforts in handling cases and show genuine care for the employee's mental health state;
- Display professionalism at all times and ensure that all actions taken are done without favouritism or prejudice;
- Continuously put in the effort required to improve service to employees;
- Follow-up with employees to make sure that they are progressing well;
- Take accountability for all suggestions, decisions and actions taken in handling mental health-related cases with employees;
- Build rapport and trust and be fully present when attending to employees. They are the most valuable asset of the organisation; and
- Display a positive attitude, and remain calm and composed at all times, especially when encountering difficult situations while handling those seeking mental health support.

6.0 Confidentiality

- 6.1 The confidentiality of relations and dealings between the support providers and the employee is paramount in protecting the safety of the employee. Support providers are required to keep confidential information disclosed by the employee relating to their mental health including information yielded by mental health professionals. Employees who reside in countries where the Personal Data Protection Act (PDPA) has been enforced should always abide by this Act.
- 6.2 Support providers have a duty to continue protecting the confidentiality of employee information. No support providers shall in any way use information so obtained for any form of gains or to cause any harm.
- 6.3 Support providers should not reveal to any parties any names or other information in connection with any mental health-related dealings with employees.
- 6.4 Support providers must also seek valid consent from the employee before sharing employee details to the Staff Assistance and Medical Administrative (SAMA) to secure mental health professionals' intervention.
- 6.5 The identity of employees who seek mental health support from the support providers must be kept confidential and only disclosed on a strictly need-to-know basis. Employees who seek support will also be protected by Maybank from any repercussions.
- 6.6 In the event of any potential red flag² cases, support providers should act swiftly and to IMMEDIATELY update the relevant parties³.

Note:

². Red flag cases refer to a life-threatening situation in which an individual is imminently threatening to harm him or herself or others, is severely disoriented and/or out of touch with reality, has a severe inability to function, or is otherwise distraught and out of control.

³. Relevant parties refer to the Group Chief Human Capital Officer (GCHCO), Stakeholder Management, Staff Assistance & Medical Administration (SAMA), and Business Human Capital.

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7.0 Required Knowledge and Compliance

7.1 Support providers are to:

- Be up-to-date with the relevant Mental Health knowledge and skills.
- Keep abreast of the applicable laws, rules and regulations, people policies and governance when tending to mental health relations.
- To use sound judgment and common sense in complying with all applicable policies, rules and governance.

8.0 Avenue to Express Viewpoint or Complaint

8.1 Employees may express their viewpoints or submit their complaints on the handling of mental health-related cases by support providers to the Group Chief Human Capital Officer (GCHCO) in writing.