



CELCOM TIMUR (SABAH) SDN. BHD.

CODE OF CONDUCT

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Message from the CT Sabah CEO

Our Code – Building Trust by Doing What’s Right

Built on the combined experience of connecting customers for over 28 years, our purpose going forward is to advance and inspire society in a way that provides a safer, connected future for all. This can only be achieved if we collectively build trust in the way we operate our business from day one, in a manner that is responsible, lawful, and ethical in our dealings with everyone across our value chain - our customers, shareholders, business partners and the society.

Building CT Sabah as a trustworthy brand must be an ongoing effort by every CT Sabah employee aligned to our value of being a Responsible and Caring organization. And our Code of Conduct (“**the Code**”) sets a high benchmark for the kind of business culture, acceptable behaviour and clear decision making that is expected of all of us.

I urge you to take some time to read and commit to upholding the Code as we move ahead to play by the rules, be accountable for our actions, be transparent and honest, and speak up when we need to. We all have a collective responsibility to do the right thing, in the right way, without any compromise, at all times.

Let’s work to build a responsible business together.

Zurinah Hanafiah
Chief Executive Officer



Why we have a Code of Conduct

As a Company with strong values, our conduct is not only about performance, goals, and achievement. It is also about how we behave towards each other and the world around us. We strive to be a trusted partner – to our customers, shareholders, and colleagues, and to our business partners and the communities in which we operate. Our business depends on this trust, and we are committed to conducting our business in a responsible, ethical, and lawful manner. The Code is the foundation of our corporate culture and sets out high standards of integrity in how we do business. Everyone in CT Sabah must follow these standards. We make decisions every day that may influence our reputation. An uninformed decision, even made with the best intentions, can damage our reputation.

The Code Principles set out the core requirements for our conduct in CT Sabah. The Code Sections include specific requirements and guidance for critical risk areas. The Code helps us all make informed decisions and explains where to go for more information and guidance.

Code Principles

The Code Principles form the foundation of our ethical culture and define the core of our business conduct.

- **Code Principle-1: We play by the rules**
We follow laws, regulations, and our policies and, if these are in conflict, we uphold the highest standard.
- **Code Principle-2: We are accountable for our actions**
We actively seek information, understand our responsibilities, and recognize our wider impact on the societies in which we operate.
- **Code Principle-3: We are transparent and honest**
We are open and truthful about our challenges.
- **Code Principle-4: We speak up**
We ask questions and raise concerns when in doubt and we encourage others to do so by creating a culture where retaliation against those who report a concern in good faith is not accepted.


Who must follow the Code

The Code of Conduct applies to all employees and everyone acting on behalf of CT Sabah, including the Board of Directors. We also expect our business partners to commit and uphold the same high ethical standards.

How to use the Code

The four Code Principles and specific requirements contained in the Code Sections form our basic obligations. Additional requirements in our Policies and Standard Operating Procedures (SOP) must also be understood and followed.

The Code sets clear requirements for our day-to-day operations and guides us when we are confronted with challenges and ethical dilemmas. You may always contact your line manager or the Compliance Function when you have questions or concerns. You may also seek advice or ask a question using the speak up channel and may even remain anonymous if necessary. The



Code cannot cover every dilemma or situation we will face in our day-to-day work. There will continue to be business challenges and uncertain legal and regulatory developments. In such cases, we are not relieved from the obligation to uphold the highest ethical standard, but we should seek guidance to help us make the right decision.

Beyond setting out our own ethical standards, the Code Principles require us to comply with applicable laws and regulations. You should always familiarize yourself with the laws where you operate and seek guidance from the Compliance Function if you have questions.

What is expected from us as “Employees”

As an employee of CT Sabah, you are expected to:

- Always act with high integrity.
- Read, understand, and follow the Code, Policies and SOPs.
- Raise issues of concern as described under the section “How to Speak Up”.
- Attend training sessions on the Code in a timely manner.
- Know when and how to seek further guidance.
- Cooperate fully and transparently in all investigations.
- Avoid any practices that may be unlawful, unethical or harm CT Sabah’s reputation.
- Assess the risks you may encounter and seek appropriate training and guidance to effectively manage them.

What is expected from our “Leaders”

Leaders in CT Sabah are not only expected to follow the requirements above, but are also expected to:

- Live the “Tone from the Top” and communicate regularly on the importance of compliance.
- Identify and anticipate business compliance risk areas that affect your teams’ operations.
- Proactively identify actions that will mitigate compliance risks.
- Ensure that teams are sufficiently trained and prepared to deal with relevant dilemmas and provide guidance where necessary.
- Foster an environment of open reporting to ensure that all team members are comfortable raising concerns without concern of retaliation.
- Act as role model for our behaviours as demonstrated in decision-making and other processes.
- Promote diversity and inclusion in the workplace.
- Use high standards of integrity as a criterion in recruitment and promotion processes.
- Avoid strategies, targets or timelines that could create pressure on employees or business partners to engage in unethical business practices.

CODE SECTIONS

Anti-Corruption

We have zero tolerance for corruption.

What we need to know

- We do not tolerate bribery or improper payments or advantages of any kind.
- We are committed to conducting our business in an open and transparent manner.
- Bribery is illegal and exposes those involved and CT Sabah to reputational and legal risk.
- Bribery may take many forms including facilitation payments, kick-back schemes and the use of shell companies or hidden owners.
- Public officials are often subject to strict anti-corruption rules and should be treated with extra caution.
- Gifts and hospitality may be considered as bribery or as providing an improper advantage in certain situations.
- Even charitable donations or sponsorships can be seen as bribery if they are undertaken to secure a commercial advantage.
- Corruption in our supply chain may create significant risk for CT Sabah even if we are not directly involved.

What is expected of all of us

- We never engage in bribery or trading in influence.
- We never offer, give, ask for or accept an improper payment or advantage.
- We never make facilitation payments unless we believe that our life or health is in danger.
- We always report any request from any 3rd party for a bribe or facilitation payment.
- We never request someone else to engage in conduct that we are not allowed to engage in ourselves.
- We carefully select our business partners and monitor their commitment to ethical and lawful conduct.
- We maintain our books and records to reflect our business accurately and fairly.
- We exercise appropriate caution when interacting with public officials.
- We always speak up to our managers, the Compliance Function, or through the Integrity Hotline when we have concerns regarding corrupt conduct of our colleagues or business partners.

What to look out for

- If we become aware of unusual or inflated payment terms that appear to have no clear business purpose.
- If we suspect that a business partner is not complying with CT Sabah's standards for business conduct.
- If we become aware that a business partner is interacting with public officials on our behalf.
- If requests are made to donate to charities or sponsor organizations that may be affiliated with a public official.
- If we are offered or requested to provide gifts, travel, donations, or lavish entertainment or to make cash payments for any reason.



Business Partners

We expect our business partners to meet our standards and respect our ethical values when working for or with us.

What we need to know

- The actions of our business partners can damage our reputation and expose us legally.
- Business partners include individuals and entities, with whom CT Sabah engages or plans to engage, such as suppliers, agents, distributors, franchisees, joint venture partners, sponsorship and donation recipients, sustainability partners and other relevant parties.

What is expected of all of us

- We only work with business partners that demonstrate satisfactory standards of responsible business conduct and ethical values.
- We expect our business partners to abide by all applicable laws, to meet CT Sabah's *Code of Business Practice* for responsible business conduct and to protect us from risks while working for or with us.
- We exercise caution when selecting business partners, and we follow CT Sabah's procedures including risk assessments.
- We monitor and support our business partners to conduct their activities in accordance with CT Sabah's standards for responsible business conduct.
- We carefully evaluate business opportunities to ensure that they are in compliance with applicable trade controls including sanctions regimes and import-export requirements.
- We treat all business partners with respect and in a fair and transparent manner.

What to look out for

- If we encounter a business partner not fully committed to following our standards including CT Sabah's *Code of Business Practice*, where applicable.
- If we seek to engage a business partner who will operate as a lobbyist, agent or other party which will act on behalf of CT Sabah.
- If we become aware of that a business partner conducts business in a way that could reflect negatively on CT Sabah.
- If any business partner has not been properly assessed and managed according to CT Sabah's requirements.
- If we become aware of other behaviour or circumstances that make us question the conduct or ethics of a business partner.



Climate & Environment

We are committed to protecting the environment and contributing to the prevention of climate change.

What we need to know

- We comply with local laws and internationally recognized environmental standards.
- We are committed to minimizing our use of resources including energy, water, and raw materials.

What is expected of all of us

- We seek to make reasonable efforts to minimize greenhouse gas emissions from our operations.
- We consider climate and environmental impact when purchasing products and services and evaluate our suppliers on responsible business criteria.
- We support sustainable waste management including making reasonable efforts to minimize our waste.
- We are transparent and report on how our activities impact the climate and environment.
- We report incidents we see that are harming the climate and the environment.

What to look out for

- If we become aware of CT Sabah's operations and suppliers that fail to meet our climate and environmental standards.
- If we become aware that applicable environmental regulations or Company guidelines are being breached.

Competition

We compete fairly.

What we need to know

- Fair competition is important to society and creates long-lasting business opportunities for CT Sabah in all countries where CT Sabah is present.
- Creating or benefiting from an unfair advantage will harm our reputation with our customers, business partners and the public.
- Anti-competitive agreements or practices are not only against our standards, but they are also against the law.

What is expected of all of us

- We make our own pricing and business strategy and compete on the merits of our offerings.
- We limit communications with actual or potential competitors and do not share commercially sensitive information.
- We do not formally, or informally, enter into agreements or practices with actual or potential competitors to share markets, fix prices or limit input or sales.
- We obtain approval according to our internal requirements before joining a Trade Association or Industry Forum.
- We remove ourselves immediately from the discussion and report the conversation to our Legal Function and/or Integrity Hotline should a conversation with an actual or potential competitor turn into an inappropriate, anti-competitive subject.
- We have an obligation to promptly report suspected violations of competition laws to the Compliance Function.



What to look out for

- If we are approached by actual or potential competitors, customers, or business partners with information about their pricing, strategies, business tactics or similar topics.
- If we suspect formal or informal agreements exist, or otherwise are to be entered into, that limit our actual or potential competitors' access to customers or related markets.
- If we plan to attend informal or social meetings with actual or potential competitors.
- If we plan to interact with actual or potential competitors where there are indications that the objective is to exchange competitive sensitive information.
- If we plan to establish pricing strategies or other market strategies that could be viewed as abuse of dominant position.

Confidentiality and Information Handling

We treat information as a valuable asset and act accordingly.

What we need to know

- As employees of the Company, we sometimes come across confidential information regarding CT Sabah, customers, or business partners.
- Most information is digital and can easily be accessed, modified, shared, and replicated.
- Records are information with high corporate value. They are important to Celcom Digi and must be identified and protected.
- There may be external requirements as to how long you can or must retain different types of information.
- Confidentiality is critical for CT Sabah's reputation, for protecting CT Sabah's interests in competitive and regulatory processes, and for securing the integrity of our assets.

What is expected of all of us

- We only share confidential information when we are formally authorized to do so and there is a legitimate reason for doing so.
- We protect confidential information from unauthorized access.
- We promote a knowledge-sharing culture but take precautions when processing confidential information.
- We treat information from third parties with the same level of confidentiality and care as our own information.
- We do not discuss sensitive topics in public places.
- We ensure that all information from CT Sabah is reliable and correct and complies with high professional and ethical standards.
- We use CT Sabah approved systems and perform information processing activities in line with any issued requirements.

What to look out for

- If we overhear a CT Sabah employee speaking about non-public information in public.
- If a business partner requests us to sign a confidentiality or non-disclosure agreement.
- If we are handling information or Company records which are sensitive and should be protected.
- If someone attempts to engage us in discussions that will lead to details of CT Sabah's business.
- If you are sharing confidential information with any external parties.



Conflict of Interest

We always act in CT Sabah's best interests.

What we need to know

- A conflict of interest exists when our personal interest conflicts, or could be perceived to conflict, with CT Sabah's interests.
- Personal interests include our financial interests, business opportunities, outside employment or the interests of people close to us, such as close family members, personal friends, or business associates.
- Even the perception that we may not be acting in CT Sabah's best interests can call into question our integrity and adversely affect our reputation.
- All decisions that are made on behalf of CT Sabah must be based on an objective and fair assessment of the Company's interest without being impacted by our personal interest.
- Openness and transparency are essential to manage actual, potential, or perceived conflicts of interest.
- A conflict of interest can still exist even if the Company benefits in some way.

What is expected of all of us

- We avoid conflict of interest and other situations which could impact our judgment.
- We recuse ourselves from situations and decisions where we have a potential or perceived conflict of interest.
- We promptly disclose actual, potential, and perceived conflicts of interest to our manager.
- We work with our manager to resolve conflicts of interest and document our decisions and actions.
- We always involve the Compliance Function if a conflict of interest cannot be avoided.
- We do not hold external duties or positions that could affect, or be perceived to affect, our responsibility to act in CT Sabah's best interests.
- We obtain written approval from our manager before accepting external directorships or other material assignments, and we keep records in accordance with Company procedures.

What to look out for

- If we have a financial or other interest in an existing or potential business partner of CT Sabah's.
- If we hold outside employment or positions that could interfere with our ability to perform our duties for the Company.
- If we are recruiting, hiring, or directly supervising a family member, friend, or individual with whom we have a close personal relationship.
- If we are offered anything of value in our personal capacity by existing or potential business partners including gifts, discounts, or other benefits.
- If a business partner of CT Sabah is providing or will provide services to us in our private capacity.



Financial Integrity and Fraud

We maintain accurate financial records and comply with all disclosure standards.

What we need to know

- Financial integrity is key to maintaining the trust of our shareholders, customers, business partners and employees.
- Meeting International Financial Reporting Standards is not only required, it enables us to best manage our business.

What is expected of all of us

- We follow CT Sabah's *Code of Conduct, Code of Business Practice* and abide by internal controls implemented by CT Sabah.
- We register all transactions correctly in accordance with legal obligations and good accounting practices.
- We report accurately, reliably, transparently, consistently and in a timely manner.
- We ensure that expenses are reasonable and recorded properly when we spend the Company's money.
- We make decisions in accordance with applicable Delegation Authority Matrix and ensure segregation of duties where applicable.
- We verify facts and completeness of information and underlying business rationale before approving a transaction or signing a document.
- We do not create fraudulent records, falsify documents, or otherwise misrepresent facts, transactions, or financial data.

What to look out for

- If we see financial or accounting irregularities.
- If we become aware that a colleague or business partner has falsified any documentation.
- If we are unsure if we have recorded a transaction correctly.
- If we become concerned that any employee is misreporting financial information, including sales results or forecasts.
- If we become concerned that CT Sabah's resources are not being spent or recorded as consistent with our policies.

Gifts, Hospitality and Travel

We avoid business courtesies that may be perceived as impacting business decisions.

What we need to know

- Business courtesies such as gifts, hospitality and travel may create a conflict of interest or be considered bribery in certain circumstances.
- Gifts are something given without the expectation of anything in return, including goodwill.
- Hospitality takes many forms, including meals and beverages, seminars, receptions, social events, and entertainment.
- Travel includes the costs of transportation including taxis, buses, trains, flights, accommodation and hotels and other incidental travel costs.
- Business partners, including public officials, may need to comply with strict rules on what they may give or receive.



What is expected of all of us

- We never offer or accept business courtesies which could, or could be perceived to, improperly influence a business decision.
- We never offer or accept cash, cash equivalents or expensive and extravagant gifts.
- We do not offer or accept gifts except promotional items, of minimal value normally bearing a Company logo, and only when it would be customary to do so.
- Should an employee receive a gift that is not in compliance with these rules, it shall be returned or be turned over to CT Sabah as soon as possible.
- We may offer or accept hospitality when the business purpose is clear and legitimate, the costs are reasonable, and the context is open and transparent, but we prefer to cover our own costs.
- We always pay our own costs for travel, accommodation, and related expenses. Likewise, we do not pay for travel, accommodation, and related expenses for others.
- We do not allow business courtesies to be extended to family or close friends.
- We always discuss offering or accepting business courtesies with our immediate supervisor.

What to look out for

- If business courtesies are offered during sensitive situations such as ongoing negotiations or procurement processes
- If asked to sponsor, donate, or contribute to faith-based organizations, political, governmental, military, police and/or other public institutions and entities.
- If we become aware of business courtesies that are not offered or accepted in an open and transparent manner
- If we believe that offering or accepting business courtesies could lead others to question our independence, objectivity, or integrity.
- If we become aware of repeated offers to or from the same business partner, or a related one.

Health, Safety and People Security (HS&PS)

We provide a safe and secure workplace for all employees and our suppliers.

What we need to know

- We all have a responsibility to provide a healthy, safe, and secure workplace for our employees, suppliers, and visitors.
- We recognize a shared commitment and responsibility to ensure the health, safety, and well-being in our operations and throughout our value chain.
- We comply with international and local HS&PS legislation and guidelines and aim to perform to the highest standards within this area.
- We promote as one of our core values a proactive work culture of engagement and commitment towards the health, safety and well-being of employees and everyone who works for us.
- We promote a culture of proactive HS&PS incident reporting from employees and suppliers.

What is expected of all of us

- We are conscious of our work environment, act responsibly and are accountable for our own actions.
- We proactively foster a safety culture and collaborate with our suppliers in identifying and mitigating health, safety, and security risks.
- We make ourselves aware of potential risks in our workplace and continuously work to minimize any hazards to the health, safety - and well-being of our employees and business partners.
- We ensure that incidents, near-misses, unsafe acts, and conditions are reported regardless of their severity, for lessons learned and continuous improvement.
- We immediately stop and report unsafe work.

What to look out for

- If we see any unsafe acts and conditions that might put ourselves, our colleagues, or suppliers at risk.

- If we have any concerns for the health, safety, and well-being of any employee.
- If our policies and requirements are not followed or do not comply with HS&PS legislation.
- If there are any signs of unsafe situations, elevated stress, inappropriate behaviour, or poor well-being of employees and/or business partners.

Human Rights and Labour Rights

We respect and support human rights and labour rights.

What we need to know

- We are all equally entitled to human rights and labour rights without discrimination as set out in international fundamental principles, conventions, and local laws.
- We have the responsibility to respect human rights. Respect for human rights is integral to CT Sabah's business and how we operate. Labour Rights are a vital part of human rights.
- We are committed to contributing towards a positive human rights impact on society.

What is expected of all of us

- We take necessary measures in order not to violate, nor are we complicit in violations by others, of the human rights and labour rights of our colleagues, the employees of our business partners, our customers and anyone impacted by our operations.
- We will report on any actual or potential violation of human rights or labour rights to our manager or through other existing mechanisms, such as the Integrity Hotline.
- We will contribute to positive human rights impacts, including children's rights and digital inclusion.

What to look out for

- If we experience, become aware of, or suspect any violation of human rights of our colleagues, employees of business partners or of any people where we operate.
- If we, or one of our colleagues, are prevented from joining legitimate employee engagement forums, e.g., labour unions.
- If anyone, including public officials, asks for personal data on CT Sabah employees, customers, or business partners without the right authorization and without following due process.
- If a contract, we are negotiating has such a low price or short delivery period that it will likely lead to low wages or excessive working hours for business partner employees.
- If an existing or potential business partner refuses to commit to the *Supplier Conduct Principles* or is not willing to collaborate in relation to inspections, audits, or other transparency efforts.

Insider Trading

We do not share or act on inside information.

What we need to know

- Inside information is any non-public information that would impact the stock price of a Company if it was known to the -public, such as financial results not yet disclosed publicly, potential mergers and acquisitions, senior management changes and significant legal matter.
- Trading on inside information violates our ethical standards and is a personal criminal violation under any jurisdiction's laws and may lead to severe consequences for you personally and for CT Sabah as a Company.
- Sharing inside information with others who then trade on that information is considered tipping and is a violation of both our governing documents and the law.



What is expected of all of us

- When in possession of inside information about CT Sabah or any other Company, we do not trade, engage in tipping, or suggest that others trade in any securities.
- We treat all inside information that is not generally available to the investing public as proprietary and confidential.

What to look out for

- If we become aware of a business or legal issue that may have positive or negative consequences for the price of CT Sabah's stock or that of a customer or business partner.
- If someone suggests that we buy or sell a security based on material non-public information.
- If we are notified that we are on an insider list.
- If we are part of a merger acquisition or key strategic project.

Money Laundering

CT Sabah is opposed to all forms of money laundering.

What we need to know

- Money laundering is the process of hiding or disguising the proceeds of a crime.
- The proceeds of a crime can be anything of value including money, goods, assets, and real estate
- Money laundering may take many forms and can occur in all kinds of deals and transactions, including banking, investments, invoicing, and property.
- Trusts and shell companies may disguise the true owners of money and increase the risk of money laundering.
- Money laundering also includes the use of legitimate funds to support criminal activity or terrorism.

What is expected of all of us

- CT Sabah seeks to engage business partners involved in legitimate business activities with funds derived from lawful sources.
- We avoid money laundering by screening and monitoring our business partners in accordance with CT Sabah's procedures.
- We question unusual payments or banking arrangements and report unusual requests.
- We always consult the Legal and/or Tax Function if we are in doubt about the origin or destination of money and property.
- We promptly report suspicious transactions or incidents of money laundering.
- We are attentive to potential under or overvaluing of invoices or assets.

What to look out for

- If payments are performed by or through someone who is not a party to the contract.
- If payments are requested or performed in a different manner than what is agreed to in the contract.
- If payments are received in cash and are not customarily paid in this way.
- If payments come from offshore bank accounts.
- If payments come from unusual accounts not typically used by the party in question.



News and Social Media

We always act responsibly in our external communications.

What we need to know

- CT Sabah employees are encouraged to share non-confidential news, milestones and achievements related to CT Sabah on their social media account(s).
- However, only mandated individuals are allowed to speak on behalf of CT Sabah, including on social media or other digital platforms.
- CT Sabah does not take political positions or associate with political movements, though we may participate in public debates on topics important to our strategy and business performance.
- CT Sabah does not support political parties, neither in the form of direct financial support, in-kind donations, nor paid time.

What is expected of all of us

- We do not engage in external discussions, including on social media, on behalf of CT Sabah unless we have been previously authorized to do so.
- We do not discuss sensitive or confidential information from our work in public or social media.
- We reflect only our personal views in social media. However, as a CT Sabah employee we are mindful that social media posts can spread rapidly and are difficult to retract, and therefore exercise caution before we post.
- We refer external questions about CT Sabah from journalists/media to the Communication Function and appropriate spokespersons.
- We are mindful that CT Sabah operates across multiple countries with diverse values and legal frameworks, which means that local communication can have global impact.
- We may participate in political activity provided it is lawful, conducted in our own time, with our own resources, and not linked to our employment in CT Sabah.

What to look out for

- If we become aware of public discussions on social media or other media platforms with a potential reputational risk to CT Sabah.
- When planning to speak at external events or other forums where we represent CT Sabah If we are concerned that our communications with outside sources could reflect negatively on the Company.
- If we promote our Company and receive backlash from an external audience on social media or other media platforms.

Privacy

We earn trust by protecting all personal data.

What we need to know

- We hold personal data on all our customers and employees, and we have an obligation to protect it and only use it for legitimate business purposes.
- Personal data includes employee, customer, and business partner information such as content of communications, phone numbers, e-mails, addresses, locations, call and payment history, salaries, and health information.
- All personal data is to be considered confidential.
- Responsible use of personal data is instrumental in maintaining our customers' and employees' trust.



What is expected of all of us

- We do not share personal data with anyone who does not have a specific business purpose for it, unless sharing the data has been authorized or is legally required.
- We only access personal data for specific business purposes.
- We are open and honest with our customers and employees about how we use their data.
- We ensure that personal data is processed with proper access control, security, and data protection measures in place.
- We stay informed of our responsibilities related to privacy when we work with projects or initiatives that involve personal data processing.
- We follow established privacy procedures and processes.

What to look out for

- If there is unauthorized access to personal data, including sharing of data with third parties without appropriate privacy safeguards in place.
- If we are collecting data about our employees or customers which they would not reasonably expect us to collect or use in this way.
- If the personal data of our employees or customers is being used in a way that may be considered intrusive.
- If a government official requests information about an employee or a customer, including business records without following proper procedure.
- If there are any indications that personal data has been or may be compromised.

Public Officials

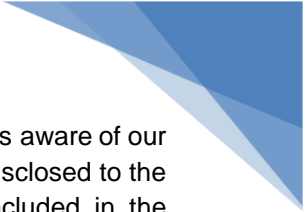
We follow high ethical standards when interacting with

What we need to know

- Public officials include all individuals employed by or acting on behalf of a government including anyone holding a legislative, administrative, executive, or military office.
- Public officials execute governance functions that are vital to the societies in which we operate and are also vital to our license to operate there.
- CT Sabah interacts with public officials at various levels and for many different purposes.
- Information shared with public officials may become public due to laws regulating public access to government-held information.
- Individuals employed by state-owned companies may be considered public officials.

What is expected of all of us

- We do not engage in conduct which could, or could be perceived to, improperly influence a public official.
- We exercise appropriate caution toward public officials when CT Sabah is engaging in a commercial or approval process.
- We are always compliant with local laws or rules that apply to public officials.
- We do not offer gifts to public officials except promotional items of minimal value, and only when it would be customary to do so.
- We do not pay for travel, accommodation, or related expenses for public officials.
- We offer only modest hospitality to public officials and only when there is a clear and legitimate business purpose, the costs are reasonable, and the context is open and transparent.
- We always discuss offering business courtesies to public officials with our manager and seek guidance from the Compliance Function as needed.
- We do not make facilitation payments to public officials, and we report requests for such payments to the Compliance Function.
- We only use lobbyists to advocate on our behalf in special circumstances with full transparency and with prior written approval by the CEO.

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- We ensure the third party towards whom any lobbying activity is being conducted is aware of our relationship with the lobbyist. In the event a lobbyist is used, it shall be promptly disclosed to the third party that the lobbyist represents CT Sabah. The obligation shall be included in the agreement with the lobbyist.
 - We do not engage in external discussions with public officials on behalf of CT Sabah unless we have been previously authorized to do so.

What to look out for

- If a business partner directly or indirectly interacts with public officials on our behalf
- If a public official asks for the personal data of CT Sabah employees, customers, or any other individual.
- If a public official requests CT Sabah to send information or messages to our subscribers.
- If a public official owns, manages, or is affiliated with a business partner.
- If a public official, or a close family member or business associate of the public official, applies for a position within CT Sabah.

Safeguarding our Assets

Security is embedded in everything we do.

What we need to know

- Company assets are everything that our Company owns or uses to conduct business including equipment, facilities, systems, and information.
- Protecting Company assets is a core responsibility for all of us.
- Intellectual property such as trademarks, copyrighted works, inventions, trade secrets and know-how, are often valuable and may be important to CT Sabah's success in the market.
- Security threats can affect our assets and have significant financial, operational, and reputational impact.

What is expected of all of us

- We always assess the security risks and follow security policies and requirements when we make business decisions.
- We report any security incidents immediately and in accordance with local procedures, laws, and regulations.
- We protect Company assets from loss, damage, theft, waste, and improper use.
- We limit employee and third-party access to Company assets to what is necessary to accomplish assigned work.
- We always follow proper protocols for granting access and do not share our access credentials, including PIN codes, tokens, and passwords.
- We only use CT Sabah approved systems for information sharing and storage.
- We protect our premises from unauthorized access, and we wear our CT Sabah badge visible when in the office.
- We protect CT Sabah's intellectual property as appropriate and respect the intellectual property rights of others.

What to look out for

- If we observe people on our premises or trying to enter our premises without authorization or properly displayed credentials
- If our cell phone, laptop, or computer is lost, stolen or suddenly behaves differently.
- If we receive emails, messages, or calls that are suspicious.
- If we detect vulnerabilities in our systems, processes, or facilities.



Workplace Environment

We treat each other with respect and dignity.

What we need to know

- All employees deserve a workplace environment, independent of work location, that is free from harassment, intimidation, discrimination, or threats of violence for any reason, including actions based on gender, sexual orientation or identity, race, ethnicity, disability, national origin, religious or cultural beliefs or citizenship.
- We view employee diversity as a competitive advantage, as it broadens our perspectives and allows us to better understand our customers' needs.
- CT Sabah does its utmost to actively promote equality in all employment practices.
- We foster a working environment where people are treated honestly and professionally and are valued for their unique ideas and differences.

What is expected of all of us

- We show respect for our co-workers and treat them as we ourselves would like to be treated.
- We do not retaliate against any employee, business partner or customer for raising a good faith concern.
- We do not engage in conversations or send communications of any kind that contain offensive name-calling, jokes, slurs, stereotyping, blackmailing or threats, nor do we display or share offensive pictures, cartoons, drawings, or gestures.
- We actively listen to different points of view and consider those perspectives exclusively on their own merits.
- We confront any incidents of harassment or inappropriate behaviour and proactively protect our work environment.
- We do not use alcohol or illegal drugs in the workplace, or abuse prescription medication, and we never purchase sexual services on business trips or other assignments.


What to look out for

- If we experience, witness, or hear of any form of bullying, mocking, or harassment of any kind.
- If we experience or become aware of incidents of harassment, sexual harassment, or discrimination of any kind, involving anyone.
- If our managers and supervisors are repeatedly identifying one colleague or a specific Company of colleagues for criticism or special treatment based on characteristics unrelated to their work
- If we suspect that certain colleagues are not receiving fair consideration for promotions or project assignments
- If we are concerned that certain individuals or groups of colleagues are excluded from participating in activities or discussions

How to Speak Up

One of the Code Principles is that we “speak up.” We ask our managers and the Compliance Function when we have questions about whether activities are ethical or compliant with our Code, and we always challenge and report activities that we believe may breach our Code or applicable law. Through reporting we enable CT Sabah to keep its promise to operate legally and ethically and we help the Company to protect its good reputation. It is a responsibility that we share as CT Sabah employees.

It sometimes takes courage to come forward and share your concerns. If you are not comfortable discussing or reporting an issue to your manager or the Compliance Function, you may use the *Integrity Hotline* which is available to all employees, business partners and stakeholders. The Integrity Hotline is designed to protect the privacy of individuals who report a concern, and individuals who are the subject of a reported concern, through a reporting channel that is directly to the Company's Head of Compliance. All reports are treated as confidential, and only the Company's Head of Compliance, Head of HRAC and CEO have access to them.



The channel is always open and is available in most local languages. **You may choose to remain anonymous.** Your identity is kept confidential unless you agree otherwise.

All reported concerns are taken seriously and given fair and objective follow-up. The reports are first received and reviewed by CT Sabah Head of Compliance. In cases that present serious allegations or concerns CT Sabah Head of Compliance will undertake an independent investigation to clarify relevant facts. Other cases are transferred to and managed by an appointed independent function. All functions are required to maintain information in the strictest confidence to ensure the integrity of the process.

An important part of our compliance program is taking effective corrective action and, where appropriate, employee discipline. In all cases, the Compliance Function supports management in resolving the investigated concerns to determine whether disciplinary or corrective actions are required. Anyone who violates the law, the Code, or a CT Sabah Policy may be subject to disciplinary action, up to and including termination of employment. Such violations may damage CT Sabah's reputation and result in commercial loss, and violations of the law may expose CT Sabah, and even the individual violator, to fines, penalties, damages and, in some cases, imprisonment.

It is important to remember that we can all report suspected unethical or illegal behaviour without fear of retaliation. CT Sabah does not tolerate retaliation of any kind against those who speak up in good faith. Contact the CT Sabah Integrity Hotline at compliance@ctsabah.com.my.