Group Human Rights Policy

JULY 2026

Version 2

Approved by the Maybank Group Board of Directors

INTRODUCTION

The Group believes that respect for human rights is fundamental to building a responsible, inclusive and values-driven organisation. As a leading financial institution in Southeast Asia, we recognise our role and influence in promoting human rights, not only within our own operations, but also across our value chain, including employees, clients, customers, vendors and the communities in which we operate.

Respecting human rights is not just a moral obligation, but is also essential for maintaining trust and advancing sustainable business development. This is in line with the Group's mission of *Humanising Financial Services*, which places people at the heart of everything we do. By embedding human rights considerations into our business practices, we are better positioned to deliver inclusive growth, mitigate risks and support rightsholders in navigating an evolving global landscape.

We remain committed to strengthening our sustainability agenda by aligning the Maybank Group Sustainability Framework with internationally recognised human rights principles and standards. This alignment is aimed at preventing the risk of causing, contributing to, or being directly linked to adverse human rights impacts, while ensuring that our grievance mechanisms are accessible, transparent and equitable.

HUMAN RIGHTS GOVERNANCE STRUCTURE

Group Board of Directors (BOD)

Board Sustainability Committee (BSC)

EXCO Sustainability Committee (ESC)

Human Rights Working Group (HRWG)

- Group Community Financial Services (GCFS)
- Group Global Banking (GGB)
- Group Human Capital (GHC)
- Group Sustainability & Maybank Foundation
- Group Strategic Procurement (GSP)
- Group Legal
- Group Non-Financial Risk (GNFR)
- Group Compliance

GOVERNANCE FOR HUMAN RIGHTS IMPLEMENTATION

Embedding sustainability and the respect for human rights in the Group's business processes is driven by top-level leadership, reflecting a strong commitment to responsible and ethical operations.

The **BOD** provides strategic oversight and direction for the overall sustainability agenda, ensuring these principles are integrated across the Group's strategy, governance and operations. This includes upholding human rights and promoting responsible, ethical and sustainable practices that support long-term value creation for all stakeholders.

All policies and processes related to sustainability are endorsed by the **BSC**, chaired by a Non-Executive Independent Director. The BSC has responsibility for overseeing and monitoring the execution of the Group's sustainability strategy and its integration.

The Group Chief Sustainability Officer (**GCSO**) provides periodic updates on sustainability, including the progress of the Group's human rights commitments, to the BSC and the ESC, chaired by the President and Group Chief Executive Officer (**PGCEO**). The **ESC** is responsible for steering and ensuring the effective implementation of the Group's sustainability commitments.

This Group Human Rights Policy (the Policy) was developed by the **HRWG**, a senior management-led, cross-functional team responsible for its implementation and continuous enhancement. The HRWG plays a key role in integrating human rights considerations at strategic, tactical and operational levels across the Group and value chain. This includes reviewing and assessing initiatives, identifying areas for improvement, and guiding the establishment of procedures to address salient human rights risks across geographies, business sectors and entities.

The HRWG also oversees stakeholder engagement, strategic partnerships and affiliations on human rights matters, while supporting the development and communication of the Group's human rights strategies, targets and performance indicators. It is responsible for monitoring the integration of human rights considerations into business plans and operational frameworks, ensuring robust systems are in place to track progress and maintain compliance with applicable legal and regulatory requirements.

OUR COMMITMENT

We are committed to respecting human rights in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs). We recognise our responsibility to respect human rights and take steps to ensure that our operations, financing activities and business relationships do not cause or contribute to harm, while addressing any risks or adverse impacts that may arise. Under Pillar II of the UNGPs – Corporate Responsibility to Respect Human Rights, we are committed to upholding this responsibility across our activities and value chain.

Avoiding the causation or contribution to adverse human rights impacts through our core business functions such as lending, investment and client engagements	Taking appropriate steps to prevent or mitigate human rights risks that are directly and indirectly linked to our products, services or operations	Establishing and supporting grievance mechanisms that enable affected rightholders to raise concerns and access remedy, where relevant
Principles 13, 19	***Principles 13, 17-20***	***Principles 29, 31***

We uphold human rights and labour standards in accordance with internationally recognised principles and standards.

International Bill of Rights

- **United Nations Universal Declaration of Human Rights (UDHR)**
- **International Covenant on Economic, Social & Cultural Rights (ICESCR)**
- **International Covenant on Civil & Political Rights (ICCPR)**

We adhere to the International Labour Organisation's (ILO) 1998 Declaration on Fundamental Principles and Rights at Work and its core Conventions. Our approach is further guided by the National Action Plans on Business and Human Rights (NAPBHRs) in the jurisdictions where we operate. As a signatory and active member of the United Nations Global Compact (UNGC), we support the Ten (10) Principles covering human rights, labour, environment and anti-corruption. This Policy will be embedded across the Group's relevant processes and management systems to support effective implementation and operationalisation.

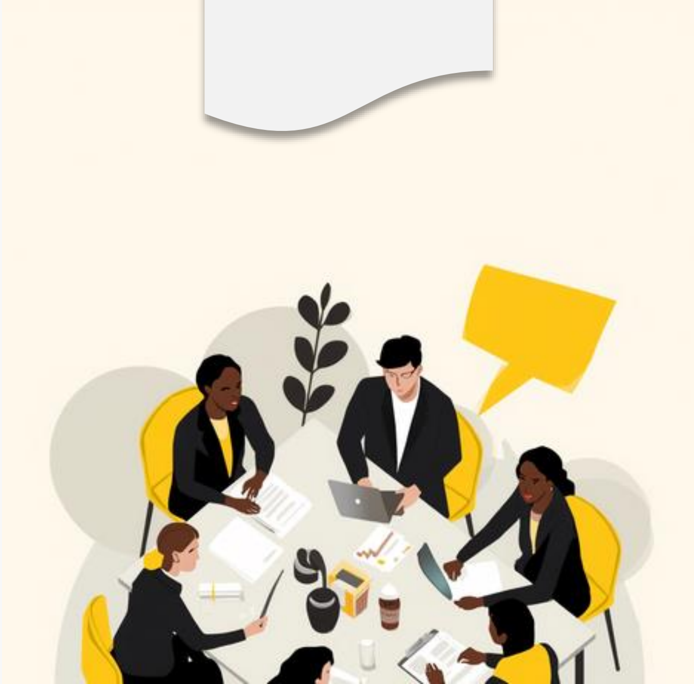
The Group complies with all applicable national laws and regulations across our operating jurisdictions. Where international standards exceed local laws, or where there are conflicts, we will seek to uphold internationally recognised human rights principles, while remaining sensitive to local contexts and stakeholder concerns.

OUR APPROACH TO HUMAN RIGHTS

The Group is committed to respecting human rights across all our operations and value chain, with particular attention to vulnerable and disadvantaged groups including children, women, persons with disabilities (PwD), migrant workers, indigenous peoples and marginalised communities. This Policy is integral to the Group's approach across our role as an employer, provider of financial services, lender/financier and investor, and purchaser of goods and services. We adopt a **risk-based approach** to human rights, aligned with the UNGPs, by strengthening our processes across operations, business activities, and the value chain.

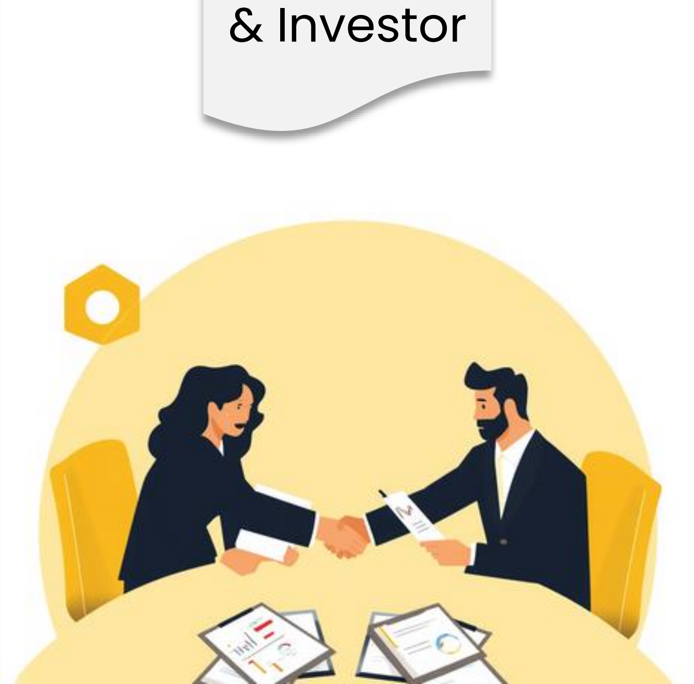
Our **Human Rights Due Diligence (HRDD)** is an ongoing process to identify and address potential adverse impacts, while integrating human rights considerations into decision-making. We are committed to monitoring and evaluating the effectiveness of our measures to drive continuous improvement. We also engage proactively with relevant stakeholders and external experts to ensure our procedures are robust and aligned with emerging best practices. The Group's objective is to identify, prevent, mitigate and account for actual or potential adverse human rights impacts that we may cause, contribute to, or be directly linked to through our operations, products or services.

As an Employer



As a Provider of Financial Services

As a Lender / Financier & Investor



As a Purchaser of Goods & Services

As an Employer

We are committed to the fair and equitable treatment of our employees, fostering diversity and inclusion, ensuring safe working conditions, and prioritising health and safety.

We offer competitive compensation and respect the rights to freedom of association and collective bargaining.

As a Provider of Financial Services

We are committed to advancing financial inclusion by ensuring equitable access to services for all individuals, including those from underserved and unserved communities, regardless of background or socioeconomic status.

We uphold consumer rights, ensure product integrity and transparency, and safeguard customer privacy and data, strengthening trust and security across our offerings.

As a Lender / Financier & Investor

We assess potential investments and financing activities to ensure that we do not support entities or projects associated with human rights violations, while actively supporting investments that generate positive social impact.

We also monitor ongoing compliance to uphold ethical standards.

As a Purchaser of Goods & Services

We hold our suppliers to stringent ESG and human rights principles, ensuring that all procured goods and services comply with the Group’s vendor policies and due diligence processes.

We conduct regular assessments and ongoing engagements to mitigate the risk of association with exploitative or unethical practices.

OUR RIGHTSHOLDERS

EMPLOYEES

CLIENTS & CUSTOMERS

VENDORS

LOCAL COMMUNITIES

This Policy applies to all principal activities of the Group, including business pillars and support functions across key subsidiaries and international operations. It covers **employees**, **clients**, **customers**, **vendors** and the **communities** we engage with or impact through our operations. Vendors refer to suppliers, business partners, joint ventures (JV), distributors, brokers, professional advisors, outsourced third-party service providers, contractors, and their respective employees, agents, subcontractors, parent companies, affiliates, and overseas entities (hereinafter referred to as vendors).

It also applies to all work-related environments, including the Group's offices, work locations, business travel, social events and external communications.

The Group engages periodically with regulators and other government authorities through roundtables and forums on a broad range of human rights-related matters, including regulatory compliance, risk management, professional business conduct and the fair treatment of consumers.

Leveraging both internal and external human rights expertise, we are committed to fostering meaningful stakeholder engagement on salient human rights issues.

EMPLOYEES

The Group is committed to fostering a workplace that upholds the dignity and wellbeing of all employees. The **Maybank Group People Policies (MGPPs)** comprise a suite of policies and guidelines, anchored by the **Maybank Group Code of Ethics and Conduct**, covering key aspects of human capital management, including human rights safeguards, prevention of harassment, talent acquisition, learning and development, and performance and consequence management. Through the MGPPs we ensure that our employees are treated fairly, work in safe and inclusive environments, and have equal opportunities for growth and development. These policies cover critical areas such as non-discrimination, fair remuneration, freedom of association and grievance mechanisms, reinforcing our role as a responsible employer.

As the Group continues to expand digital presence in line with our strategy to accelerate digitalisation and technology modernisation, we recognise the importance of equipping our workforce with future-ready capabilities. We have implemented digital upskilling and reskilling initiatives aimed at ensuring our employees remain relevant in an increasingly dynamic environment, including advancements in artificial intelligence (AI). Our strong learning culture is supported by comprehensive learning and development programmes, enabling employees to pursue industry-recognised professional certifications, in-house training and remote learning platforms designed to build essential skills.

We also foster a sustainability mindset beyond the workplace, nurturing a sense of purpose and belonging amongst employees as a core element of our mission.

Our human capital strategies, policies, practices and performance metrics are captured through the Group's People Dashboard, with salient data disclosed annually in public reports.

CLIENTS & CUSTOMERS (1/2)

In line with the Maybank Group Code of Ethics and Conduct and Maybank Group Business Ethics Charter, we require that all dealings with current and potential customers are conducted fairly and equitably. The Group upholds the highest standards of professional conduct and strives to avoid business activities that may cause or contribute to harm, which includes adverse impacts on people, communities or the environment, whether physical, economic or psychological in nature.

The Group's broader Environmental, Social and Governance (ESG) position is also defined across six (6) key sectors, namely agriculture, forestry and logging, construction and real estate, power, oil and gas, as well as mining and quarrying, as detailed in the Maybank ESG Position available on our corporate website. In assessing clients within these sectors, we aim to conduct thorough due diligence to evaluate human rights risks and proactively engage clients to ensure that their practices align with our standards.

Human rights considerations are embedded within our Maybank Group Transition Finance Framework (TFF) and Maybank Group Sustainable Product Framework (SPF), which align our business practices with international standards and industry best practices. These frameworks serve as key instruments in guiding the assessment and evaluation of sustainable and transition finance transactions. The Group does not condone any form of exploitation, including child labour, forced labour or payment of wages below minimum legal requirements, across any part of the value chain. This is reinforced through our No Deforestation, No New Peat, No Exploitation (NDPE) stance, applicable to relevant sectors. This Policy reflects our broader commitment to responsible financing that does not support human rights violations.

CLIENTS & CUSTOMERS (2/2)

All clients are subject to Anti-Money Laundering (AML)/Counter Financing of Terrorism (CFT) controls to prevent the misuse of our financial services for illicit purposes. Other ESG risk considerations, including a broad range of human rights and environmental concerns, are integrated into the Group's credit and risk management processes through the use of the **ESG Screening Document** and **Risk Acceptance Criteria (RAC)**. These measures are reinforced by the **Maybank Group ESG Risk Management Framework (ESGRMF)** and **Climate Risk Policy**. As part of our approach, climate and human rights-related criteria are incorporated into ESG assessments across lending, investment, insurance and asset management activities.

Where risks are identified, we will work collaboratively to implement corrective actions, or where necessary, disengage appropriately. The Group will not provide financing for activities that contravene our core values, especially those involving harmful and exploitative practices.

VENDORS

The Maybank Vendor Code of Conduct (VCoC) and Sustainable Procurement Principles (SPP) set clear expectations for vendors on human rights, labour standards, environmental protection and ethical business conduct. These include prohibitions on child labour, forced labour, bribery and corruption, as well as requirements for safe working conditions, data protection and fair treatment.

In line with the Group's zero-tolerance stance on modern slavery, the SPP prohibits all forms of exploitation and requires vendors to uphold legal and voluntary employment practices that meet or exceed applicable labour standards. Vendors are also expected to have **effective grievance mechanisms** and **whistleblowing channels** in place to address violations. Additionally, the Group encourages vendor diversity, with focus on supporting small and medium enterprises (SMEs) owned by women, minorities and local communities.

All vendors must acknowledge the VCoC and SPP during onboarding, contract renewal and tender processes. The Group also accepts vendors' own codes of conduct or comparable policies for alignment and review. **Vendor ESG Assessments** are conducted to evaluate compliance with labour laws, employment practices, occupational health and safety, migrant worker protections, non-discrimination, and freedom of association. These assessments are conducted regularly and serve as a tool for ongoing monitoring of human rights practices throughout our procurement operations. The **Watchlist Vendor Committee (WVC)** oversees vendor ESG performance, ensures accountability and provides guidance on corrective actions.

We aim to engage collaboratively with vendors to provide guidance on the standards set out in the VCoC and SPP, and to deepen understanding of human rights risks within the supply chain. This includes strengthening engagement with key vendors, certification bodies and industry associations. Through these efforts, we encourage vendors to assess and address human rights risks within their own operations and value chains, and to ensure that their suppliers also uphold these standards.

LOCAL COMMUNITIES (1/2)

The Group strives to advance human rights through meaningful engagement with local communities across the region. Through Maybank Foundation and business initiatives supporting marginalised communities, we deliver community development programmes that promote social inclusion, economic empowerment, access to education and cultural preservation, as detailed in the Maybank Social Impact Report.

Our local operating units in ASEAN countries regularly engage with a broad range of stakeholders, including individual community members, women's groups, village leaders, Non-Governmental Organisations (NGOs), private foundations, social enterprises and local authorities to ensure that development efforts are responsive to community needs and aligned with human rights principles.

As part of our ongoing efforts to enhance community engagement, we are strengthening our capacity to identify human rights risks that may result in severe adverse impacts arising from our business activities. Leveraging existing experience and methodologies, we seek to incorporate diverse perspectives, particularly from vulnerable and marginalised groups, to better inform risk mitigation and strategies. This participatory approach allows us to co-develop community-led solutions, enhance grievance mechanisms, and build long-term partnerships grounded in mutual respect and accountability.

LOCAL COMMUNITIES (2/2)

We uphold the principle of **Free, Prior and Informed Consent (FPIC)** in accordance with international standards, particularly for clients operating in sectors where FPIC is required and where activities may significantly impact indigenous peoples and local communities. We recognise their right to self-determination and control over their lands and resources, and will work with clients and stakeholders to ensure that community voices are heard and meaningfully reflected in project planning and decision-making.

Financial inclusion is also a key enabler of human rights and a driver of poverty reduction, economic resilience and social equity. We are committed to ensuring that all individuals, especially underserved and vulnerable communities, have access to essential financial services in a fair, affordable and responsible manner.

In addition, we aim to continuously develop inclusive and accessible financial products, eliminate discriminatory practices, and promote financial literacy through targeted community programmes. This includes leveraging digital platforms and aligning with national financial inclusion strategies to expand access across all markets where we operate.

OUR HUMAN RIGHTS FOCUS AREAS

As part of our commitment to respecting and upholding human rights, the Group conducted a Human Rights Salience Assessment (HRSA) to identify and prioritise the most salient human rights risks and impacts across our operations and value chain based on the evaluation of severity and likelihood.

This HRSA enabled the Group to determine issues that may result in the most severe adverse impacts on our rightsholders. Guided by these findings, we have established priority human rights focus areas that reflect our responsibility to prevent, mitigate and address these risks proactively and meaningfully.

- **Workforce Diversity & Workplace Inclusion**
- **Health & Safety**
- **Workplace Security**
- **Working Hours, Wages & Benefits**
- **Freedom of Association & Collective Bargaining**
- **Modern Slavery**
- **Anti-Bribery & Corruption**
- **Data Privacy & Protection**
- **Responsible Marketing & Product Integrity**
- **Environmental Impact on Human Rights**

WORKFORCE DIVERSITY & WORKPLACE INCLUSION

The Group's core values, **T.I.G.E.R. (Teamwork, Integrity, Growth, Excellence and Efficiency, and Relationship Building)**, guide our approach to innovation, performance and employee engagement, while ensuring that we remain responsive to the diverse needs of our customers and the communities we serve. We are committed to upholding **fair, equitable and inclusive practices** in all aspects of employment, including recruitment, career progression, remuneration and benefits.

The **Maybank Group Workforce Diversity and Workplace Inclusion Policy** states that all employees, regardless of gender, ethnicity, age or other distinctions, shall be treated fairly in a **workplace free from unlawful discrimination** and one that upholds the principles of diversity, equity and inclusion (DEI). Such distinctions may include race, disability, family or marital status, national origin, political affiliation, religion and socioeconomic background, depending on applicable jurisdictional considerations.

As part of this commitment, the Group ensures that our lending practices are fair and transparent. We are committed to **providing equitable access to financial services**, with decisions based on clear criteria to ensure that no individual is excluded because of unlawful discrimination. We work to remove any barriers that may prevent marginalised or vulnerable groups from accessing credit, fostering an environment where all customers are treated with **dignity and respect**.

Email	thrive@maybank.com
Centralised Helpdesk	+603 2630 1020 (ext. 3)
WeCare WhatsApp Account	

HEALTH & SAFETY (1/2)

The Group adopts a holistic approach to employee wellbeing, integrating mental, physical and emotional support to foster a resilient and high-performing workforce. We ensure compliance with all applicable occupational safety and health (OSH) standards and regulations across our operating jurisdictions, and take reasonable measures to prevent workplace accidents and illnesses. Regular risk and hazard assessments are conducted, with continuous improvements implemented as required.

The Group has a three (3)-tier OSH Committee structure, comprising both management representatives and employee unions, to oversee the implementation of the **Maybank Group OSH Policy** at an operational level. This committee is responsible for managing health and safety matters across the organisation, including addressing the needs of our mobile workforce as part of our broader efforts to enhance resilience.

Mental health is given equal priority under the **Maybank Group Employee Wellbeing Policy**, which includes the **Maybank Group Mental Health Procedure**. This aims to promote mental wellbeing and foster a productive and healthy workplace by outlining clear guidelines and accessible support channels for employees facing mental health challenges. We provide three (3) channels of support for employees to manage workplace and mental health-related concerns.

HEALTH & SAFETY (2/2)

Recognising our influence as a leading financial institution, the Group encourages responsible labour practices among our clients and vendors. We expect our business relationships to respect international standards and uphold the right to a safe and healthy working environment. Through our financing, procurement and investment decisions, we seek to strengthen health and safety management across our value chain, particularly in sectors and geographies where these risks are most significant. Where appropriate, we engage with clients and vendors to support continuous improvement in workplace health and safety practices.

The Group also strives to integrate health, safety and wellbeing considerations into our community-based programmes. We ensure that initiatives, particularly those involving children, marginalised populations or vulnerable workers, are designed and implemented with appropriate safeguards to minimise risks and promote both physical and psychological wellbeing.

To further strengthen business continuity and organisational resilience, the Group continues to institutionalise preventive measures for the early identification and mitigation of potential disruptions, ensuring uninterrupted operations even in times of crisis.

WORKPLACE SECURITY (1/2)

The Group recognises that an inclusive, respectful and prejudice-free workplace is fundamental to enabling all individuals to thrive and participate fully. As stated in our **Maybank Group Dignity Policy**, the Group does not tolerate unlawful discrimination, bullying, bias and harassment in the workplace, ensuring that all employees are provided with a safe environment where they are treated with dignity and respect.

Violence and harassment may occur in three (3) primary forms:
- Physical (e.g. beatings, kicking, slapping, pushing, unwelcome physical contact)
- Psychological (e.g. verbal abuse, bullying and cyberbullying)
- Sexual (e.g. sexual assaults, unwanted advances, sexual favours)

Within the workplace, violence and harassment may arise between co-workers, from supervisors or involve clients and customers. Contributing factors may include psychosocial hazards, unlawful discrimination and toxic cultures that normalise inappropriate behaviour. Certain roles, such as customer-facing positions or isolated work environments, may also present heightened risks.

These behaviours may affect both internal and external stakeholders. Employees may experience violence or harassment from colleagues, clients or vendors, while customers may be exposed to inappropriate conduct by the Group's personnel or other customers within our premises. All cases of harassment will be investigated in a fair, timely and impartial manner, with appropriate support provided to affected individuals.

WORKPLACE SECURITY (2/2)

To reinforce our commitment to a safe and dignified workplace, we conduct regular training programmes on sexual harassment and non-discrimination via e-learning platforms and interactive engagement sessions. These initiatives are designed to enhance awareness of employees' rights and responsibilities, as well as available reporting channels for misconduct. Information on how to raise concerns is readily accessible through internal communication platforms.

Unlawful discrimination, whether overt or systemic, primarily affects our employees by undermining morale, diminishing trust, increasing attrition and constraining innovation. However, its impact can also extend to external rightsholders, including customers and service providers, where unfair practices such as bias or preferential treatment based on individual characteristics rather than merit may arise. The Group is committed to identifying, preventing and addressing all forms of unlawful discrimination across our operations and value chain by embedding these principles into relevant policies, codes of conduct, and vendor expectations.

We hold both the Group and our stakeholders accountable to these standards to maintain a safe, respectful and inclusive environment that upholds the dignity and rights of all. Our clients and vendors are likewise expected to adopt a strict stance on harassment and maintain high standards of professional conduct and workplace integrity. Where cases of harassment are identified, the Group reserves the right to take appropriate remedial action, which may include disciplinary measures, contractual termination or legal action, in accordance with applicable laws and internal policies.

WORKING HOURS, WAGES & BENEFITS (1/2)

The Group is committed to remunerating employees above statutory minimum wage levels in each country of operation. As an employer, we recognise our responsibility to respect and promote fair labour practices.

We endeavour to enable all our employees to be in a position to earn a living wage by 2030, as encouraged by the UNGC and in line with national expectations. A living wage represents the minimum level of total remuneration, including salary and benefits-in-kind, required to achieve a decent standard of living, based on relevant cost-of-living benchmarks. This encompasses essential needs such as housing, food, healthcare, education, transportation and savings.

Employee compensation is benchmarked against industry and local labour market standards to remain competitive. To further strengthen our **Workforce Diversity & Workplace Inclusion** culture, we strive to maintain pay equity, ensuring remuneration is based on objective criteria such as roles, experience and performance, and is not influenced by gender, ethnicity, age or other personal characteristics. We continuously monitor and address pay disparities across the Group.

Anchored in the principles of pay-for-performance and affordability, our Total Rewards Framework ensures fair and appropriate, aligned with relevant market indices.

WORKING HOURS, WAGES & BENEFITS (2/2)

All employment terms and conditions are fully compliant with applicable local laws and regulations. Beyond compliance, we provide a comprehensive suite of benefits addressing diverse needs, including employee and family wellbeing, religious obligations, and education or career development assistance for employees and their dependents.

In support of gender equality, the Group acknowledges gender pay gap as a key indicator of income inequality and continues to implement measures to eliminate bias in remuneration practices, maintaining a focus on objective evaluation of skills, responsibilities and experience.

In accordance with ILO standards, we respect reasonable working hours, ensuring they remain within legal thresholds and do not compromise employee health and wellbeing. This includes fair compensation for work performed, alongside efforts to promote work-life balance through flexible and hybrid arrangements under the **Maybank Group Work Arrangement Policy**.

We also expect our vendors and clients to uphold fair labour practices in line with international standards, including providing wages that meet or exceed legal minimum requirements. Working hours must comply with legal limits, including provisions for overtime, rest periods, and leave entitlements, while benefits such as social security, medical coverage and paid leave are provided fairly and equitably.

FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING

The Group recognises and fully supports the rights of our employees to freely associate and engage in collective bargaining. We respect the right of all employees to form, join or participate in national and in-house unions of their choice, without fear of unlawful discrimination or retaliation. This commitment to freedom of association is integral to fostering a positive and productive working environment.

We maintain a longstanding, constructive relationship with unions, which play a vital role in representing the interests of employees. Through ongoing engagement, the Group ensures that employees have a meaningful voice in shaping their terms and conditions of employment through their unions.

Fair treatment and equitable terms of service are upheld as part of the Group's broader commitment to respecting freedom of association and collective bargaining, in alignment with international labour standards.

MODERN SLAVERY

The Group does not condone any form of modern slavery, such as child labour, forced labour and human trafficking across our global operations and value chain. We are committed to ensuring that no individual is subjected to involuntary, coerced or exploitative labour in any form.

We endeavour to operating free from child labour and strictly prohibit all forms of child exploitation. The employment of individuals below the legal minimum working age, as defined by applicable laws in the jurisdictions where we operate, is categorically prohibited.

The Group strives to uphold child safeguarding principles in the delivery of our social programmes, community initiatives and related engagements. We recognise the importance of protecting children from exploitation and will continue to strengthen safeguards across our operations and supply chain to prevent such risks. This includes measures to protect children from physical, mental and emotional abuse, as well as preventing their involvement in hazardous work or activities that interfere with their education.

It is our responsibility to prevent the misuse of our products and services for illicit purposes. The VCoC, SPP and NDPE stance set clear expectations for clients, vendors and business partners to uphold rigorous labour standards and respect human rights throughout our value chain. We aim to actively assess and monitor risks associated with forced labour practices, including debt bondage, withholding of wages, isolation and restriction of movement, to ensure that no form of exploitation or trafficking occurs.

ANTI-BRIBERY & CORRUPTION

Corruption is widely recognised as a facilitator of human rights abuses, as it can enable the exploitation of workers, silence whistleblowers and obstruct access to justice or equitable treatment, particularly for vulnerable groups such as migrant workers, women and local communities. Bribery may also obscure supply chain risks and weaken grievance mechanisms, allowing exploitative practices to persist unchecked.

By embedding anti-corruption measures across our operations and value chain, the Group seeks to prevent such abuses, protect the dignity and respect the rights of affected individuals, and uphold an ethical operating environment grounded in accountability.

The Group is committed to upholding the highest standards of integrity and transparency across all jurisdictions in which we operate. In line with applicable laws, we have implemented a comprehensive **Anti-Bribery and Corruption (AB&C) framework**, supported by the **Maybank Group AB&C Policy and Procedure**, as well as mandatory employee training programmes to enhance awareness and ensure compliance.

DATA PRIVACY & PROTECTION

Data privacy and the protection of personal data are fundamental to maintaining the trust of our employees, customers and other stakeholders, and are governed by the **Maybank Group Data Privacy Policy** and **Information Risk Management Guidelines**. As the Group accelerates the use of technology to drive the digitisation and modernisation of our products and services, we aim to ensure that robust data security controls are in place to safeguard privacy and protect personal data. This commitment extends to all individuals whose personal data may be collected or processed through our operations, and we ensure compliance with applicable data protection laws and regulations across our operating jurisdictions.

To safeguard stakeholder data and enhance cybersecurity resilience, we have implemented a range of security measures and risk management practices focused on preventing, detecting and responding to cyber threats, while strengthening user support. Through targeted training, awareness programmes and engagement initiatives, we equip employees at all levels to protect sensitive information, comply with regulatory requirements and effectively manage information security risks.

As digital adoption accelerates, privacy risks have become increasingly prominent. The misuse or mishandling of personal data can result in significant human rights impact, including violations of privacy, unwarranted surveillance and exploitation. The Group strives to remain vigilant in monitoring, mitigating and addressing these risks to safeguard individuals' rights and maintain stakeholder trust across our value chain.

RESPONSIBLE MARKETING & PRODUCT INTEGRITY (1/2)

The Group upholds the principle that all stakeholders have the right to access financial products and services that are fair, transparent and understandable. Ethical communication is key to empowering them to make informed financial decisions.

We endeavour to provide clear, accurate and accessible information, especially when engaging with vulnerable groups. This includes the responsible use of personal data for marketing purposes, careful handling of sensitive topics, and efforts to promote responsible consumption and financial literacy.

We recognise that financial products can be complex, and that inadequate or misleading communication may result in stakeholders purchasing products or services that they do not fully understand, potentially leading to debt, financial hardship or loss of savings.

RESPONSIBLE MARKETING & PRODUCT INTEGRITY (2/2)

Deceptive practices, such as unfair lending, can undermine consumer rights and disproportionately affect vulnerable groups. To address these risks, the Group strives to design marketing and communication activities with integrity by:

- Providing transparent and easily understood product information and marketing communications;
- Complying with all applicable laws, regulations and industry standards across the jurisdictions in which we operate;
- Ensuring that marketing communications are directed only to customers who have provided the necessary consent, while safeguarding data privacy and confidentiality;
- Clearly disclosing the risks, costs, terms and implications associated with financial products and services; and
- Avoiding aggressive or misleading sales and marketing practices, particularly when engaging with vulnerable or financially distressed individuals.

This approach supports the Group's commitment to responsible business conduct, consumer protection and the fair treatment of all.

ENVIRONMENTAL IMPACT ON HUMAN RIGHTS (1/2)

The interdependence between human rights and the environment is increasingly recognised, as the realisation of human rights depends on access to a clean and sustainable environment. Environmental degradation can adversely affect the enjoyment of fundamental rights, including those related to health, safety, livelihoods and wellbeing. Consequently, the advancement of sound environmental stewardship must be accompanied by an equally strong commitment to respecting and upholding human rights.

For the Group, this evolving landscape presents both reputational and operational risks as regulators, investors and civil society organisations (CSOs) increasingly scrutinise the environmental and human rights impacts associated with financing activities. In anticipation of emerging regulations and stakeholder expectations, the Group aims to strengthen our sustainability framework to reflect the interconnectedness of environmental and human rights considerations by:

- Enhancing due diligence processes to identify and assess environmental and human rights risks in lending and investment decisions, especially in high-risk sectors;
- Further integrating the UNGPs into existing ESG frameworks and risk management practices;
- Strengthening climate and environmental risk assessment tools to align with evolving international standards and best practices;
- Establishing stakeholder engagement mechanisms to identify, understand and respond to community concerns, particularly in affected regions; and
- Encouraging transparent disclosure of environmental and human rights impacts, supported by having effective grievance and remediation mechanisms.

ENVIRONMENTAL IMPACT ON HUMAN RIGHTS (2/2)

To ensure effective management of environmental and social risks, the ESGRMF is integrated into the Group's established risk management processes, namely risk identification, assessment and measurement, response and control, and monitoring and reporting. These four (4) components provide a structured and systematic approach to managing environmental and social risks across the Group's operations and value chain.

We publicly recognise and respect the rights of Environmental and Human Rights Defenders (EHRDs) and indigenous peoples, acknowledging their essential role in protecting ecosystems, safeguarding community rights and contributing to sustainable development.

The Group is committed to ensuring that our operations and financing activities do not contribute to threats, intimidation, retaliation or harm against these groups, and that they are meaningfully consulted and engaged in decisions that may affect their lands, resources, livelihoods and way of life.

AWARENESS TRAINING & CAPACITY BUILDING

To ensure the effective implementation of this Policy, the Group will provide appropriate training and awareness programmes to employees, ensuring they are aware of the Policy's requirements and understand their respective roles and responsibilities in supporting its implementation.

These programmes are designed to communicate expectations and promote the consistent application of the Policy across all levels of the organisation. Delivery channels may include employee induction sessions, roadshows across branches and regional offices, certification programmes, non-executive briefings, e-learning modules, and management-level trainings.

The Group also aims to conduct targeted workshops for employees in leadership and decision-making roles, equipping them with the knowledge and tools required to effectively integrate human rights considerations into their areas of responsibility. These sessions emphasise the importance of embedding human rights principles into business decisions, operational processes, and daily activities, while strengthening accountability for implementation across the Group.

REPORTING CHANNELS

Any person who is aware of, or has reasonable grounds to suspect, that any improper conduct has been committed by an employee, representative or business associate of the Group may make a disclosure. The Maybank Group Whistleblowing Policy Statement and information on disclosure channels for both internal and external stakeholders are available on our corporate website. Disclosures may be made via any of the following channels:

Automated Hotline	Secured voice recording: Toll-free number 1-800-38-8833 or +603-20268112 for callers overseas
Email	whistleblowing@maybank.com
Letter	Group Compliance, P.O. Box 11635, 50752 Kuala Lumpur
e-Form	Access the Maybank Group Whistleblowing e-Form at: https://www.maybank2u.com.my/maybank2u/malaysia/en/personal/about_us/whistleblowing-form.page

For further information on the list of tollfree lines in jurisdictions where the Group has presence, please click here.

We are committed to ensuring that each complaint is properly considered and managed through evidence-based procedures to enable informed decisions and avoid any form of bias. The identity of a whistleblower who makes a disclosure in good faith will be protected by the Group from any repercussion. Efforts will be made to maintain confidentiality, while recognising that certain situations may require the involvement of authorities, including participation in legal proceedings.

GRIEVANCE MECHANISMS

The Group ensures that individuals impacted by our operations have access to effective grievance mechanisms that are accessible, transparent, equitable and fair. We require that these mechanisms be in place for both the Group's own operations and those of our clients and vendors.

Our **Whistleblowing Governance Committee (WGC)** is chaired by an Independent Non-Executive Director. The WGC provides oversight to ensure that disclosures are made through the whistleblowing channels receive appropriate attention and are handled with independence, investigation and remedial action, where necessary. The WGC ensures that the grievance mechanisms are aligned with the following standards:

ACCESSIBILITY
Multiple whistleblowing channels are available for raising concerns, both online and in person, and in various languages to accommodate the diverse jurisdictions in which we operate.

TRANSPARENCY
Clear processes and indicative timelines are in place for resolving grievances, with information communicated appropriately in accordance with internal policies and procedures.

EQUITABILITY
Complaints are managed impartially and without bias.

PROTECTION
Individuals who make disclosures or raise concerns in good faith are safeguarded from any form of repercussion.

EFFECTIVENESS
The grievance mechanisms ensure meaningful resolution and the implementation of appropriate corrective actions.

Our ESG Screening Document for medium and large corporations, as well as Vendor ESG Assessment, includes questions on whistleblowing channels and grievance mechanisms. This allows us to determine if our clients and vendors have appropriate processes in place to address potential human rights issues and provide remedies to affected stakeholders.

KEY CONTACTS

If you have any queries regarding this Policy, do not hesitate to contact either of the following:

General Inquiries (Group Sustainability)	sustainability@maybank.com
Client / Customer-related Inquiries	esgbusiness@maybank.com
Supplier-related Inquiries	vendor.esgmailbox@maybank.com
Community-related Inquiries	mf.inquiry@maybank.com
Employee-related inquiries	ghc4u@maybank.com

APPROVALS & PERIODIC REVIEWS

This Policy was endorsed by the ESC on 3 September 2025 and the BSC on 10 June 2026, and subsequently approved by the Group Board of Directors on 25 June 2026.

It will be reviewed periodically to reflect ongoing developments in the Group's human rights initiatives. This includes efforts to further align human rights commitments with the Group's mission of *Humanising Financial Services*, strengthen human rights awareness and training across the workforce, and deepen engagement with key internal and external stakeholders.

Progress and developments will be communicated through periodic revisions to this Policy as a living document, as well as through the Maybank Group Sustainability & Environmental Report and other relevant communication channels.

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