



WHISTLEBLOWING /  
SPEAKING UP POLICY  
AND PROCEDURES

## Document Revisions Record

Version	Release Date	Description / Summary of Changes	Approved and Reviewed by
1.0	28 May 2020	Initial version	Duly approved and adopted by the Board of Directors of Axiata Group Berhad via Directors' Circular Resolution [No. 21-20] dated 28 May 2020.
1.1	28 September 2021	URL for Speak Up channel was updated due to change of service provider	Approved by Axiata Group Chief Internal Auditor on 28 September 2021.
1.2	22 May 2023	Adopted and implemented by PT Link Net Tbk	Legally approved by the Board of Commissioners of PT Link Net Tbk dated 22 May 2023.

## Table of Contents

1.	INTRODUCTION .....	4
2.	SCOPE.....	4
3.	WHAT TO INCLUDE WHEN REPORTING A CONCERN .....	5
4.	PROTECTION FROM RETALIATION.....	6
5.	PROCESSING OF CONCERNS RECEIVED .....	6
6.	OVERSIGHT AND OWNERSHIP OF POLICY .....	7

## Definition

Terms	Definition
Axiata Group or Axiata Group Berhad	Parent company of PT Link Net Tbk
BAC	Board Audit Committee
HIA	Head of Internal Audit
Reporter	Whistleblower; person who comes forward with certain concern and/or facts of wrongdoing/misconduct
Speak Up Channel	Link Net's Speak Up/Whistleblowing channel i.e. <a href="https://axiatagroup.integrityline.com">https://axiatagroup.integrityline.com</a>

## **1. INTRODUCTION**

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

## **2. SCOPE**

- 2.1 This Policy applies to Link Net, all wholly owned Link Net subsidiaries and joint ventures and other companies where Link Net – directly or indirectly – has a controlling interest/majority stake.
- 2.2 Employees, suppliers, business partners, contractors, customers, associates and other stakeholders/counter parties shall voice their concerns (“Reporter”), so long as there is a reasonable belief or basis for the concern and the disclosure is made in good faith and not for personal gain or motivated by ill or malicious intention.
- 2.3 Reporter shall ensure that mere rumour or hearsay information is not the basis for speaking up or to whistle blow.
- 2.4 The official Speak Up channel is <https://axiatagroup.integrityline.com>. It can be used to report any concerns related to Link Net business practices and non-compliances relating to, but not limited to, the areas mentioned below. This channel is not meant for anyone to report customer complaints or to make enquiries on any of the services that Link Net provides to its customers. In order for us to serve you better, please visit Link Net’s website or call the local customer service number.
  - (a) Abuse of Power/Authority
  - (b) Accounting, internal controls, auditing or IT
  - (c) Anti-competition
  - (d) Breach of company policy
  - (e) Bribery & corruption
  - (f) Data confidentiality or privacy
  - (g) Conflict of interest
  - (h) Fraud & breach of trust
  - (i) Gifts, sponsorships, donations, entertainment & hospitality

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

### **3. WHAT TO INCLUDE WHEN REPORTING A CONCERN**

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

#### **4. PROTECTION FROM RETALIATION**

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

#### **5. PROCESSING OF CONCERNS RECEIVED**

- 5.1 Concerns reported via the official Speak Up channel will be received by the Administrators of the Speak Up channel (comprised of Link Net's Head of Internal Audit ("HIA"), a staff member from Link Net's Investigations Unit, a function of Link Net's Internal Audit Department.
- 5.2 The Administrators of the Speak Up channel shall assess the concern based on the information provided by the Reporter such as nature of the concern, when and where did the alleged misconduct happened, details of the person(s) involved, witnesses, supporting evidences and other relevant information provided.
- 5.3 Employment related complaints or grievances shall be referred to Link Net's Human Capital Department to be addressed in accordance with their policies and procedures.
- 5.4 If the reported concern warrants an investigation, the Administrators of the Speak Up channel assign the reported concern to an Investigator to conduct the investigation in a fair, objective and confidential manner, within a reasonable period depending on the nature of the concern.
- 5.5 On completion of the investigation, a report shall be prepared and submitted to the relevant stakeholders according to Link Net's Speaking Up/Whistleblowing Governance Matrix.
- 5.6 Consequence management, including disciplinary actions, shall be meted out according to Link Net's Disciplinary Policy and Code of Conduct; documented and monitored. Where the findings of a case disclose a possible criminal offence, the case shall be escalated to Link Net's Board of Audit Committee ("BAC") and Board of Commissioners for deliberation. Link Net will report criminal matters to the police or relevant regulatory bodies/authorities if such reporting is required by the applicable law based on the results of the investigation.
- 5.7 The person who reported the concern will be updated on the status and/or progress of the investigation subject to Link Net's policies and procedures.
- 5.8 Details of all the concerns raised (investigated or not) shall be maintained. Respective status, reports, supporting documents, evidence, and monitoring of corrective action shall be retained and securely filed by the Administrators of the Speak Up channel, for a minimum period of retention according to local Indonesian laws.

5.9 Any leakages or exposure of the investigation results will be treated as a major misconduct and subject to disciplinary action, as stipulated in the applicable Link Net's Disciplinary Policy.

**6. OVERSIGHT AND OWNERSHIP OF POLICY**

6.1 Link Net's BAC has overall responsibility for this Policy and oversees the implementation of this Policy. Link Net's HIA has the day-to-day responsibilities of administering and implementing this Policy directly reporting to the BAC. The use and effectiveness of this Policy shall be regularly monitored and reviewed by the Link Net's HIA.

6.2 The owner of this Policy is Link Net's HIA who shall be responsible for incorporating any amendments and updates after obtaining the approvals of Link Net's BAC and Axiata Group's Chief Internal Auditor for all amendments and updates and distributing the same to the relevant parties.