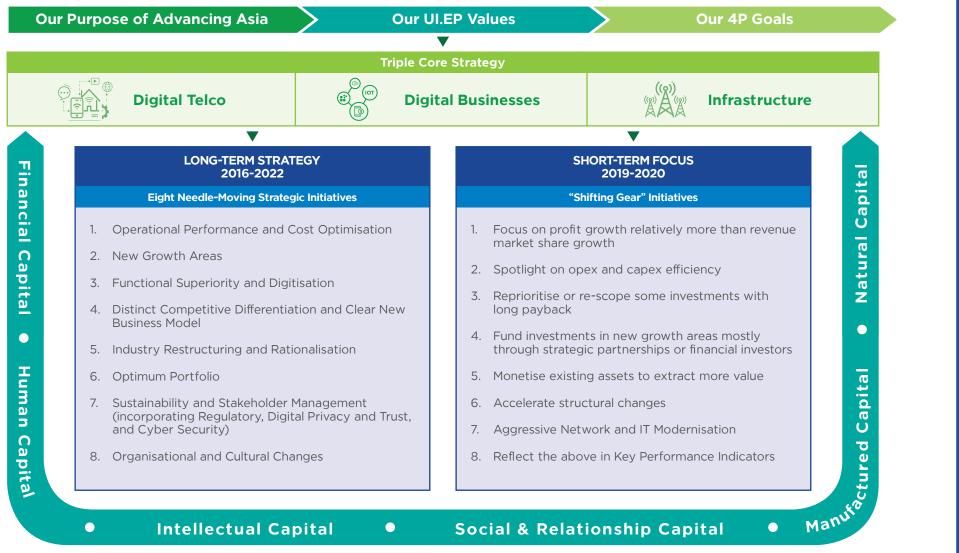
Our Strategy

Our Long-Term Strategy Towards Digital Market Leadership

- Guided by the Axiata 3.0 strategic blueprint, the Group is currently focused on executing our Triple Core Strategy to become a globally competitive Digital Champion in the IR 4.0 era
- Eight Needle-Moving Strategic Initiatives were identified within the Axiata 3.0 playbook to generate outcomes aligned with our New Generation Digital Champion ambition, including the execution of a Group-wide Digital Transformation Strategy which pervades all aspects of our business and operations to drive end-to-end digitisation
- Without taking our foot off the pedal in delivering our long-term goals, in the short-term, the Group will prioritise profitable growth and cash focus between 2019-2020 through our "Shifting Gear" initiatives as part of our commitment to maximise value creation in an increasingly challenging business landscape

AXIATA 3.0: BECOMING A NEW GENERATION DIGITAL CHAMPION BY 2022



te Our Performance

22

Integrated Annual Report 2018

> Operating Environment

Axiata operates in a complex environment exposed to macroeconomic and geo-political shifts, a tightening regulatory landscape, rapidly evolving telecommunications and technology trends, and disruptive competition, among others.

	Operating Environment	angle Implications for Our Strategy $ angle$	Way Forward
Macroeconomic Environment	 Global growth estimated at 3.9% in 2018, with increasing risks to the outlook for 2019¹: Increased growth anxieties in Asian emerging markets as spillover effect of US-China trade policy tensions Forex volatilities where the Ringgit Malaysia strengthened against regional OpCo currencies, whilst at the same time depreciating against the US Dollar 	 Exposure to unfavourable forex translation from regional OpCo contributions, and forex and derivatives losses Efficient cost management and optimum capital allocation is required to enable long-term growth 	 Disciplined implementation of "Shifting Gear" initiatives Continue to be a top performer in all metrics and capture or retain market leadership Continue portfolio optimisation and rationalisation in line with business goals
Regulatory Environment	 Axiata's regional OpCos operate within differing regulatory environments impacted by various factors: Regulations pertaining to Cyber Security, Data Protection and Customer Privacy Changing taxation structures and doing business fees to accommodate needs of emerging markets Political shifts in operating markets More stringent environmental regulations aimed at reducing radiation emissions from base transceiver stations (BTS) 	 Axiata employs studies on the impact of our businesses and corporate responsibility initiatives in all in-country engagements with policy makers and regulators Ensuring high levels of Cyber Security, Data Protection and Customer Privacy Group-wide to inspire customer trust and maintain network integrity 	 Axiata is working with like-minded industry partners to develop advocacy on issues and topics related to the digital economy and digital technologies Proactive engagements with relevant stakeholders including regulators and governments
Internalising the Digital Shift	It will be necessary for telco players to shift their operating models, processes and organisational culture to cope with the proliferation of Fourth Industrial Revolution (IR 4.0) technologies and related developments in order to remain competitive	• In order to maintain market relevance, the Group has to adopt and embed rapidly evolving IR 4.0 technologies to capture growth opportunities in our Triple Core Business segments	 Disciplined execution of Group-wide Digital Transformation Strategy Leveraging on Internet of Things (IoT) capabilities within the Group to capture high growth opportunities in Home and Enterprise segments Developing the three core digital businesses towards profitability by 2022
Competitive Landscape	 Telco companies operate in an environment rife with hypercompetition and structural challenges: The onset of IR 4.0, explosion in demand for data and technological disruptions by non-telco players such as Over-The-Top (OTT) players contribute to an overwhelmingly competitive environment Overcrowding in the telco industry in some markets is expected to further pressure telco players' bottom lines in countries such as Malaysia, Indonesia and Sri Lanka 	 In addition to achieving cost competitiveness and efficiencies, it is becoming increasingly critical to identify collaboration and partnership opportunities to adapt in this competitive environment Tapping into explosive data growth trends by expanding our digital product portfolio, as well as providing customers seamless connectivity via network upgrades and enhancements 	 To continue investing in network modernisation to offer best-in-class connectivity for customers Offer a clear and distinctive value driven customer proposition through product leadership and leading the way in innovative data-led products via collaborative opportunities and partnerships in the marketplace
Technology Shifts	Commercial deployments of 5G technologies have begun in more developed markets such as the US, Korea and Australia, and 5G smartphone releases have been announced by major manufacturers. IoT devices, custom business application and use cases will soon emerge. Key factors constraining rapid 5G deployment in emerging markets include access to affordable and sufficient spectrum, and a weak business case for deployment in markets where 4G is still only just reaching mass market adoption and coverage	 5G is the next evolutionary step in global mobile connectivity, bringing ultra-fast, high capacity and low latency broadband and IoT connectivity services. This aligns with Axiata's Digital Telco business which is focused on converged telecom and digital solutions for our Consumer, Home, Business and Government customers 	 In the medium-term, Axiata will follow a 5G "hot-spot" approach in 5G deployment combined with continual upgrading of the existing 4G networks to 4G LTE AdvancedPro with 5G plug-ins To explore 5G network sharing models to address some of the business challenges

Note:

Stakeholder Engagement

Axiata's continuous value creation efforts take into consideration our interactions and engagements with a diverse base of stakeholders across our regional footprint in ASEAN and South Asia. In developing and maintaining strong relationships, we take into account the Group's multiple roles within our different groups of stakeholders, including being an employer, communications provider, technology innovator and infrastructure developer. We engage our stakeholders through various channels on an annual basis. Details of our engagements for the year 2018 can be found in our standalone Sustainability and National Contribution Report (SNCR) 2018, as well as our website at www.axiata.com

In addition to these engagements, in 2018 we undertook a structured process to prioritise our stakeholder groups. The purpose of this exercise was to gain deeper insights into the nature of the relationships we have with our stakeholders and identify the Group's key stakeholders. For further information on our Stakeholder Prioritisation Exercise, please refer to the SNCR 2018.

The prioritisation exercise provided greater clarity on the degree of influence and dependence our stakeholders have on our business. Based on this, we were able to more effectively understand investor concerns as well as respond to legitimate needs and interests. The top seven priority stakeholder groups identified through this exercise were the Senior Management Team, Investors and Shareholders, Board of Directors, Regulators and Government, Employees, Business Partners and Customers.

In addition, Axiata, facilitated by an independent sustainability consultant, engaged our seven key stakeholders through a survey to gauge their perception and views on the relative importance of an array of matters which the Group should focus on, which was also a step within our materiality assessment process. Apart from providing an effective platform to address stakeholders' needs and concerns within the context of our operations, the survey provided an opportunity to exchange views and ideas, and explore new opportunities. We engaged a total of 120 stakeholders from these seven stakeholder groups.

As our different stakeholder groups are concerned with specific and particular matters, and have diverse ideas about what creates the most value, we understand these matters cannot be treated separately but rather as a coherent whole to the entire business. Descriptions of how the Group has taken into account and responded to the key stakeholders' legitimate needs and interests are available in the SNCR 2018.

Highlights of insights we obtained from the stakeholder engagement



Our Business

Statements and Analysis

Our Performance

Our Governance

Integrated Annual Report 2018

24



Risks and Materiality

Management of Material Business Risks & Opportunities

To drive our value creation efforts, Axiata uses an integrated assurance methodology to manage our material risks, which focuses on risk identification, along with the Group's exposure and potential impacts. Based on this, we identify mitigation measures and opportunities which are aligned with our New Generation Digital Champion ambition. The Group adopts the Axiata Enterprise Risk Management (ERM) Framework as a standardised approach for timely identification, reporting and management of principal business risks and ensures implementation, tracking and review of effectiveness of mitigation actions for the risks identified.

Risk Governance Structure

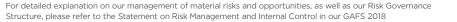
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The Board of Directors is at the apex of our risk governance structure, and is assisted by the Board Audit Committee in evaluating the adequacy of our risk management and internal control framework. A Board Risk Management Committee, which is supported by the Group Risk Management Department, oversees and assists our OpCos with the adoption of appropriate mitigations for material risks raised at OpCo level.

Our Risk Profile¹



	Category		
1) Strategic and Investment Risk	5 Financial Risk	 Governance and Integrity Risk 	
2 Geo-Political Risk	6 People Risk	(10) Cyber and Data Privacy Risk	
3 Regulatory Risk	⑦ Operational Risk	1) Digital Risk	
④ Market Risk	8 Technology Risk		
egend	🗕 High (H) 😑 Moderate (M)	Low (L)	



¹ The above Risk Profile reflects the aggregated risk rating across 2018

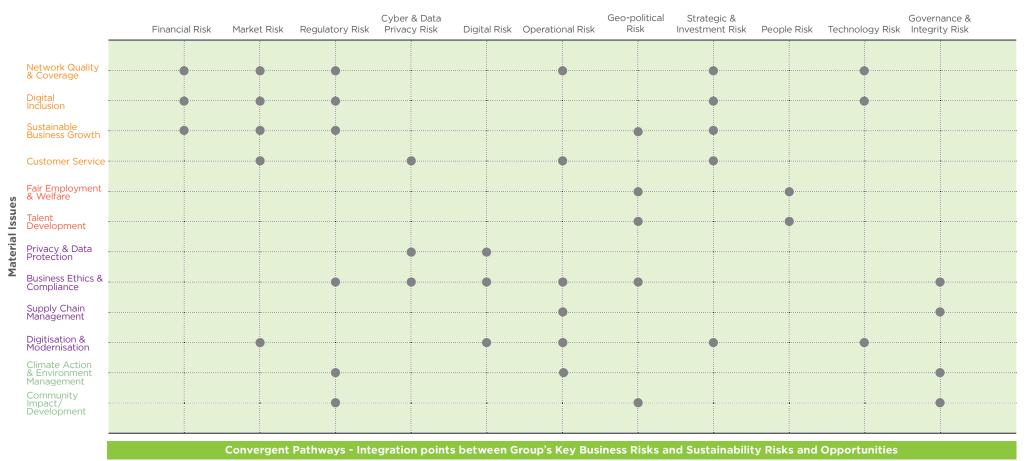
Note:



Material Convergence Process

In 2018, Axiata harmonised the risk assessment and materiality processes by integrating our risk assessment parameters as part of our materiality assessment. Additionally, we strengthened our approach in conducting stakeholder engagements specific for materiality assessment purposes. These efforts signify a key milestone in our journey towards cultivating integrated thinking Groupwide. The convergent pathways and/or integration points between the Group's business risks and

material matters are illustrated in the figure below. These material issues are centrally managed through the implementation of our Eight Needle-Moving Strategic Initiatives and are discussed in detail throughout the IAR 2018, SNCR and GAFS 2018. A comprehensive discussion of our materiality assessment is disclosed in the SNCR 2018.



Our Key Business Risks

Integrated Annual Report 2018

26



Risks and Materiality

Risks and Opportunities

The table below presents a summary of our most material business risks for the year 2018, along with mitigations taken, and opportunities identified arising from these risks. We have also defined our risk levels, indicating if the risk has increased, decreased or remained stable from the previous

year, as well as linked each risk to our material issues. For a detailed dicussion on other linked material issues, please refer to the GAFS and SNCR 2018.

Risk	Context	Risk Level and Movement	Mitigating Actions and Opportunities Arising	Key Risk Indicators	Link to Material Issues
Strategic and Investment	Venturing into new growth areas to create additional revenue streams such as participating in digital and OTT initiatives, and investing in new markets and connectivity services	High level, unchanged since 2017	 The Mergers and Acquisition Committee oversees all acquisitions and divestments, whilst maintaining a robust due diligence process to evaluate and manage the potential risks involved Risk Owner: Mergers and Acquisition Committee 	Return on Invested Capital (ROIC) < Weighted Average Cost of Capital (WACC)	 Sustainable business growth Other linked material issues: Digitisation and modernisation Network quality and coverage Digital inclusion Customer service
Geo- Political	The Group operates in markets affected by political instability, civil unrest and other social tensions	High level, unchanged since 2017	 Working closely with OpCos and leveraging on their local expertise, knowledge and ability to continually assess the changing political scenario, with various measures in place to ensure a timely response in the event of such occurrences Risk Owner: OpCo Management 	General Election	 Business ethics and compliance Other linked material issues: Fair employment and welfare Talent development Community impact/ development
Regulatory	The telecoms sector is subjected to a range of rules and regulations by various regulatory bodies. Telcos are subject to high tax rates and significant spectrum acquisition costs in auctions, in addition to multiple levies such as service taxes, excise duties and Value Added Tax (VAT)	High level, unchanged since 2017	 Advocating strict compliance, and fair and transparent practices of government policies Dedicated personnel and resources to constantly monitor all relevant developments, and maintain regular contact and relationships with the authorities Continuously enhancing process flows to encourage quick and cost-effective responses to changing regulations Regularly engaging with regulatory officials to implement sustainable regulatory regimes which will lead to the development of healthy regimes Participating in government consultations and industry association events to foster collaboration and knowledge sharing for best industry policies and practices Risk Owner: Group Regulatory 	Change in regulatory regime due to change in government or introduction of new laws	 Business ethics and compliance Other linked material issues: Climate action and environmental management Sustainable business growth Digital inclusion Network quality and coverage

Risks and Materiality

Risk	Context	Risk Level and Movement	Mitigating Actions and Opportunities Arising	Key Risk Indicators	Link to Material Issues
Market	Our key markets are predominantly emerging markets generally characterised as being economically less developed, prone to economic uncertainties and sensitive towards any changes in developed countries. Our OpCos continue to be challenged by stiff price competition with little certainty of possible market consolidation in certain markets. In some markets, overall industry revenue suffered a Year on Year decline	High level, unchanged since 2017	 Taking the necessary measures to drive efficiencies and innovations by investing in new technologies Cost efficiency programmes Establishing strategic ties with OTT and other digital product developers to create products and services that meet evolving customer needs, increase the Group's share of customer wallet, retain customers and maintain our Profit After Tax Risk Owner: OpCo CEOs 	ROIC < WACC	 Network quality and coverage Digital inclusion Sustainable business growth Customer service Other linked material issues: Digitisation and modernisation
Financial	As a global player with presence across 11 countries, Axiata is exposed to foreign currency exchange volatilities which could adversely affect our cash flow and financial performance. The Group has borrowings in foreign currencies and are cognisant of our foreign exchange and interest rates exposures	High level, unchanged since 2017	 Axiata Treasury Management Centre oversees and controls the Group's treasury and funding matters, and develops hedging strategies governed strictly by treasury policies, taking into consideration current and future outlook of the relevant economies and foreign exchange markets with the ultimate objective of preserving the Group's profitability and sustainability Risk Owner: Treasury Management Centre 	50:50 mix of local currency borrowings and foreign currency borrowings	 Sustainable business growth Other linked material issues: Network quality and coverage Digital inclusion
People	People are one of the key pillars of success for the Group as it underpins our ability to implement our strategy and deliver superior services to our customers	Medium level, unchanged since 2017	 Actively seek people who are capable and motivated to live the Group's values, and having in place robust talent development programmes, attractive performance-based rewards, and providing a safe and healthy work environment Risk Owner: Talent Management Team 	Turnover rate of talents and key influencers	Fair employment and welfareTalent development
Operational	As a result of our reliance on third party vendors in many aspects of our business, their performance will have an impact on our operations. As the industry is dominated by a handful of vendors, loss of supply due to a key vendor suffering business failure may significantly affect our core business and operations The Group's operations and assets span across wide geographical locations and are subject to risks of technical failures, partner failures, human errors, willful acts and natural disasters	Medium level, unchanged since 2017	 Axiata Procurement Centre's key role is to manage these risks, monitor the performance of vendors and develop new relationships to reduce dependencies Group Enterprise Risk Management continuously addresses issues such as network congestion, dropped calls and upgrades to network coverage to ensure better quality network and service delivery. Operating procedures with appropriate incident escalation procedures and adequate disaster recovery plans are in place at each OpCo to ensure seamless business continuity, as well as a global insurance programme to mitigate business losses Risk Owner: Group Enterprise Risk Management 	Disruption to service availability	 Network quality and coverage Sustainable supply chain Customer service Other linked material issues: Business ethics and compliance Supply chain management Digitisation and modernisation Climate action and environmental management

Statements and Analysis

Our Strategy The Value We Create

e Our Performance

Our Governance

28

Risks and Materiality

well

Integrated Annual Report 2018 🔀

Risk	Context	Risk Level and Movement	Mitigating Actions and Opportunities Arising	Key Risk Indicators	Link to Material Issues
Technology	Constantly striving to be at the forefront of technology and innovation in all our operating markets	Medium level, unchanged since 2017	 To remain relevant, it is imperative that we constantly review and refresh our technology, and yet maintain financial prudence. Our capital expenditure intensity remains high as a result of the need to constantly invest in technology Risk Owner: Group Finance, Group Technology 	ROIC < WACC	 Digital inclusion Digitisation and modernisation Network quality and coverage
Governance and Integrity	The Group is driven by our key values of UI.EP to maintain high ethical standards and good corporate governance, which we believe to be a key success factor when conducting business in a global, highly competitive, regulated and changing market	Low level, unchanged since 2017	 The Axiata Code of Conduct sets out rules and guidelines on how personnel acting for or on behalf of the Group are expected to conduct business Risk Owner: Group Human Resource, Group Company Secretary 	Deviation from Group's set standards and governance framework	 Business ethics and compliance Other linked material issues: Supply chain management Climate action and environmental management Community impact/ development
Cyber and Data Privacy	Axiata is cognisant of the sensitivity of our customers' information, which includes their personal data, records of communications information, Internet behaviours and locations, as well as digital applications. We recognise the importance of having effective and meaningful privacy protection in place when we collect, use and share personal data. We aim to instill digital trust and confidence in our customers through robust Privacy and Information Security policies, frameworks and management. Our vendors and business partners too must adhere to a high standard of data protection and compliance with the Axiata Supplier Code of Conduct principles	High level, unchanged since 2017	 Established the Axiata Privacy Council in 2018 to set the Privacy and Data Protection baseline expectations in all OpCos Defined an aggressive three-year cyber security strategy - Digital Trust 2020 - to improve our processes, technology and people by 2020 Adopted the National Institute of Standards and Technology (NIST) framework and targeting improvement to our ability to effectively detect and respond to incidents Risk Owner: Group Cyber Security Steering Committee 	The Group's cyber security maturity as measured using the NIST Cybersecurity Framework	 Privacy and data protection Customer service Business ethics and compliance
Digital	As the telco industry continues to digitise, relevant laws and regulations may not have caught up with the new lines of businesses in the digital economy. Local governments within the Group's footprint are looking to impose OTT regulations requiring OTT players' compliance to create a level playing field for telcos. However, as the Group embraces Digital Businesses within our Triple Core Strategy, we will be affected by these new regulations as	Medium level, unchanged since 2017	 Given the uncertainties and inconsistencies in legal and regulatory requirements, it is important for the Group to keep pace with policy initiatives at national and international levels, and expedite the implementation of action plans to ensure compliance, as well as strengthening cyber security measures to safeguard data security and integrity Risk Owner: Group Executive Vice President 	Deviation from agreed project timeline	 Privacy and data protection Customer service Business ethics and compliance Other linked material issues: Digitisation and modernisation

Eight Needle-Moving Strategic Initiatives

Based on the Axiata 3.0 blueprint, we have identified Eight Needle-Moving Strategic Initiatives which form the measures and actions we are undertaking operationally to execute the Triple Core Strategy. All our strategic initiatives are aligned Group-wide, with our OpCos having clear Key

Performance Indicators (KPIs) to ensure they remain on track. Our Eight Needle-Moving Strategic Initiatives are mapped against our overarching 4P Goals of Performance, People, Partnership, and Planet and Society.

	Initiatives	Our Key Prog	ress in 2018	Score	Targets by 2022	Lini 4P C
R	Operational Performance and Cost Optimisation	 Cost optimisation programme delivered RM1.5 billion savings All OpCos performed best in their markets for revenue growth 	 Four OpCos performed best in their markets for EBITDA growth Two OpCos performed best in their markets for profit growth 		Top Performer in all Markets in all Key Metrics	
) EX	New Growth Areas	 Refined Digital Telco focus in the Home/Convergence segments with a fixed wireless led strategy Built a strong sales funnel for actualisation of Enterprise Businesses in 2019 	 Launched home broadband in four OpCos - Celcom, XL, Dialog and Smart Digital businesses delivered the strongest operational performance to-date and established path to profitability 		Triple Core: Digital Telco + Digital Businesses + Infrastructure = Collaboration/Group Synergy	
	Functional Superiority and Digitisation	 Using Robotics Process Automation and AI to improve our customer experience responsiveness, as well as Analytics and Contextual Marketing to better serve them Simplified our Internal Processes and modernised IT and Network Systems Digitised backend processes to provide significantly improved and paperless customer onboarding, at less than one minute, via e-Know- Your-Customer 	 All OpCos improved in digitising and modernising the core, with a blended average of approximately 50%¹ from a 2017 baseline measurement. One OpCo measured on par with the Emerging Market Top Quartile Average 		Digitised and Modernised functions	
Ŷ	Distinct Competitive Differentiation and Clear New Business Model	 All OpCos have now established their respective value discipline and are tracking well in their chosen focus of either Customer Intimacy, Product Innovation or Price Leadership 	 edotco partnered with Aerodyne Group, a leading Unmanned Aerial Systems (UAS) solutions provider, to implement innovative drone technology in its business operations 	•	Value Discipline with Clear and Distinct Customer Proposition	(
88 88	Industry Restructuring and Rationalisation	 Rationalised non-core portfolio in line with Triple Core Strategy as follows: Deconsolidated Idea investment through reclassification as a simple investment from associate 	 Disposed of entire non-strategic stake in M1 for approximately RM1.65 billion and estimated gain of RM126.5 million (completed in February 2019) 	•	Sustainable Market Structure	
Ţĵ	Optimum Portfolio	 Smart's strategic partner, Mitsui Co., Ltd. (Mitsui), exercised its call option of 10% on Smart at USD92.4 million ada secured USD20 million funds from new strategic partner Sumitomo Corporation 	 ADS' non-strategic digital venture assets were carved-out to an independent Singapore-based fund (completed in February 2019) Axiata Digital Services (ADS) obtained a strategic minority investment from Mitsui (completed in April 2019) 		Optimum Capital Allocation for Growth and Dividend	
(fref)	Sustainability and Stakeholder Management (incorporating Regulatory, Digital Privacy and Trust, and Cyber Security)	 Enhanced and strengthened cyber security and data privacy through the following measures: Established Group Cyber Security Steering Committee and Group Security Operations Centre Implemented three-year cyber security strategy Group-wide – Digital Trust 2020 Devised innovative solutions to bridge the digital divide, including new digital products beyond pure connectivity such as IoT solutions in Connected Weather Systems, Connected Agriculture and Smart 	 Poultry Farming to assist entrepreneurs and rural communities, and Social Reseller App to help our customers generate income Digital venture funds providing investment to new startups in Malaysia, Sri Lanka and Cambodia, namely Axiata Digital Innovation Fund, Dialog Axiata Digital Innovation Fund and Smart Axiata Digital Innovation Fund Launched Axiata Young Talent Programme in Cambodia to identify and nurture future leaders with a digital midset edotco's life cycle assessment of its leaner tower design found that it exceeded its 40% carbon reduction target 		Exemplary Long- term Corporate Citizen, Holistic Focus, Regulatory Fairness	
£31	Organisational and Cultural Changes	 Progressed with our ambition to empower a Modern, Agile and Digital (M.A.D.) workforce through the following initiatives: Two OpCos have started to implement Agile methodology Launched Knowledge Sharing Platform to enable and empower our employees to contribute and share ideas across the Group 	 Launched the Learning, Engagement and Accelerating Performance (LEAP) programme New performance management system "IGNITE" to boost performance and development 	٠	Modern, Agile and Digital (M.A.D.) Organisation	

¹ As assessed and validated by an independent third party in 2018

Our Business

Statements and Analysis

Our Strategy The Value We Create

Our Governance

