

Axiata Supplier Code of Conduct

Axiata is strongly committed to observing the highest ethical standards in all its procurement activities. As such, this Supplier Code of Conduct has been prepared to provide a clear statement of Axiata's expectation from Suppliers in all procurement dealings, ensuring that internationally recognised procurement ethics are followed. Transparency and accountability should be strictly adhered to in all procurement activities. This Axiata Supplier Code of Conduct establishes the standards required for conducting business with Axiata. Our goal is to work with our Suppliers to ensure full compliance with these principles. These requirements set out the minimum levels of compliance required of Axiata's Suppliers. As a Supplier you are encouraged to exceed the requirements wherever possible. We will consider these principles in our selection of Suppliers and will actively monitor Suppliers' compliance.

Laws, Including Regulations and Other Legal Requirements

Axiata Suppliers shall comply with all applicable laws and regulations in all locations and jurisdiction where they conduct business.

Policy on Corruption and Position on Conflict of Interest

Axiata expects all contracted Suppliers and companies seeking to sell goods or services to conduct their business in accordance with the highest ethical standards. Suppliers shall never offer a bribe or kickback in any form to Axiata employees, their families or nominees, or engage in unethical or unacceptable business practices in order to obtain or maintain Axiata's business. Suppliers must report to Axiata if any Axiata employees or business associates requests any such incentive. During a bid or evaluation process, suppliers should not entertain Axiata employees involved in the bid or evaluation or their families by for example, providing hospitality to special events or other functions. Any gifts given or received shall be in compliance with the law and shall not violate Axiata's policies. It is understandable that the giving of promotional items of nominal value are part of normal business practice and it is Axiata's policy that employees declare any gifts received.

Forced or Involuntary Labour

Axiata Suppliers shall not use forced or involuntary labour of any type (e.g., forced, bonded, indentured or involuntary prison labour); employment is voluntary.

Child Labour Avoidance

Axiata Suppliers shall not use child labour. The term "child" refers to any person employed under the age of 15 (or such other age where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is lowest. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported. Workers under the age of 18 shall not perform work that is likely to jeopardise the health or safety of young workers.

Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. The basis on which each worker is being paid is to be provided each such worker in a timely manner via pay stub or similar documentation.

Working Hours

Axiata expects its Suppliers to comply with industry norms and applicable local laws on working hour requirements as stipulated in any applicable country's governing labour laws. Suppliers shall ensure that all overtime work is voluntary and compensated at the prevailing overtime rates. Employees should be allowed at least one day off per seven-day week.

Respect and Dignity

Axiata Suppliers shall treat all employees with respect and shall not use corporal punishment, threats of violence or other forms of physical coercion or harassment.

Non-discrimination

Axiata Suppliers shall not discriminate in its hiring and employment practices on grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, or disability.

Freedom of Association

Suppliers shall recognise their employees' rights to join or refuse to join labour unions or associations and to bargain collectively as permitted by law. Suppliers have the right to establish favourable employment conditions and to maintain open communication and direct engagement between workers and management as a means to resolve workplace and compensation issues and promoting positive employee relations that make employees view third-party representation as unnecessary.

Health and Safety

Suppliers shall provide their employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Consistent with these obligations, Axiata Suppliers shall have and implement effective programmes that include effective safety programmes covering such areas as: human safety, emergency preparedness, chemical, physical and biological agent exposure, ergonomics, and incident reporting and investigation.

Protection of the Environment

Axiata Suppliers shall operate in a manner that is protective of the environment. At a minimum, Suppliers shall comply with all applicable environmental laws, regulations and standards, such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits and environmental reporting. Suppliers shall

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also comply with any additional environmental requirements specific to the products or services being provided to Axiata as called for in design and product specifications, and contract documents. Suppliers should strive to implement management systems to meet these requirements.

Applicability of the Code of Conduct

This Code of Conduct shall apply to all Suppliers including all Axiata-approved sub-contractors and other entities acting on the Suppliers' behalf. Suppliers including such sub-contractors shall make this Axiata Supplier Code of Conduct and other relevant information available to their respective employees in the native language(s) of the employees and supervisors.

Monitoring compliance to the Code of Conduct

To facilitate the monitoring of Suppliers' compliance with this Code of Conduct, Axiata expects Suppliers to:

- Develop and maintain all necessary documentation to support compliance with the described standards; such documentation shall be accurate and complete;
- Provide Axiata's representatives with access to all relevant records, upon Axiata's request;
- Allow Axiata's representatives to conduct interviews with the Supplier's employees and management separately;
- Allow Axiata's representatives to conduct announced and unannounced site visits of Supplier locations; and
- Respond promptly to reasonable inquiries from Axiata's representatives in relation to the implementation of this Code of Conduct

Representation

Suppliers shall provide honest, accurate and open representation of their organisation, its qualification, experience and capabilities. Suppliers shall also disclose, if requested, accurate references of previous work undertaken. Where references of previous work undertaken cannot be disclosed due to confidentiality obligations, the Supplier shall reasonably endeavour to obtain the appropriate permissions and shall at a minimum disclose such information without breaching such obligations of confidentiality.

Raising Concerns

If a Supplier wishes to report a questionable act or possible violation of this Axiata Supplier Code of Conduct, the Supplier is encouraged to engage with their primary Axiata contact to resolve the concern. However Axiata recognises there may be times when this is not possible or appropriate. In such instances a Supplier should write to Axiata's dedicated whistle-blowing email address at wisel@axiata.com or such other addresses given on Axiata's official website. Axiata will carefully evaluate and respond to concerns received. The outcome of any investigations or any follow-up actions is confidential and will be shared as and when Axiata deems appropriate. Axiata will not tolerate any retribution or retaliation taken against any Supplier who has, in good faith and with reasonable basis sought advice or reported a questionable act or possible violation.

Sanctions

A Breach of the Code of Conduct may result in actions being invoked against that Supplier, in addition to any contractual or legal remedies. The actions applied will depend on the nature and seriousness of the breach and on the degree of commitment shown by the Supplier in breach to its obligations under the Code of Conduct. The range of actions available to be imposed on the Supplier includes but is not restricted to the following:

- Formal warnings – that the continued non-compliance will lead to more severe actions;
- Disclosure of nature of breach to all Axiata subsidiaries and associate companies; or
- Immediate termination of contract, without recourse.

We, _____ hereby agree to the terms of the Axiata Supplier Code of Conduct and warrant, undertake and represent to be bound by its terms.

Authorised signatory

Name:

Designation:

Date: