

TALENT DEVELOPMENT & ATTRACTION

Talent Factory: Leadership Development and Talent Growth

Talent growth and development are integral to the Group’s overarching objectives. As the primary catalysts for our talent development initiatives, our Talent Councils ensure their efforts align with our organisational transformation and aspirations across the Group, OpCos, and Functional levels. The Councils collaborate closely with OpCos to conduct thorough planning and preparation, aligning talent priorities that accommodate the Group’s various needs and objectives. Investing in our people and providing them with opportunities to gain diverse experiences, fosters a continuous learning and development culture that fuels our long-term success.

AXcellence – Axiata CC’s first OADP (OpCo Accelerated Development Programme)



In collaboration with Melbourne Business School, AXcellence is Axiata CC’s first OpCo Accelerated Development Programme (OADP) designed for selected Axiata CC’s middle management to cultivate the next generation of thought leaders.

Anchored by the Axiata PQF, the programme comprises an experiential learning module, coaching, project-based assignments, engagements with internal and external leaders, and various other interventions to enhance participants’ thought leadership through virtual and face-to-face interactions. The programme, which was initially planned to span three years, was later refined to two years and condensed to 18 months, ensuring maximum impact and value for the participants.

Launched in August 2021 with 34 participants following an extensive selection process, the programme culminated in a Business Challenge Pitch and a graduation ceremony on 3 August 2023, with the participation of 19 attendees. The graduation ceremony was attended virtually by Axiata GCEO and Managing Director Vivek Sood, Axiata CGPO Norlida Azmi, the Melbourne Business School’s Chief Executive Education Officer, Magnus Gittins, and the participants’ line managers.



Senior Management Positions Filled Group-wide:



5 external
24%

16 internal
76%

Total: 21

Senior Management Appointment by Gender Group-wide:



3 Female
14%

18 Male
86%

Total: 21

Championship Leadership Senior & Middle Management Programmes



This programme is intricately designed to align with Axiata’s commitment to instilling a Championship Mindset, recognising winning leadership as pivotal for business scaling and success. The programme also contributes significantly to Axiata’s ambitious aim of securing a position in the Top 5 globally, perfectly mirroring AXIATA’s Winning Culture. Moreover, this initiative aims to foster a Championship mindset across all offices, synergising seamlessly with EDOTCO’s dedication to excellence and winning leadership.

Key Highlights

- Rolled out Senior Management Championship Leadership in collaboration with Asian School of Business and MIT Sloan School of Management
- Engaged 60 senior leaders across all National Tower Companies
- Achieved an impressive average effectiveness rating of 4.8/5
- Virtual Coaching Sessions with Gilbert Enoka, who is a renowned All Blacks Mental Coach and has been appointed as EDOTCO’s global leadership mental coach

Notes: ¹ Senior management is defined as CEO and CEO-1 (Direct report of Chief Executive Officer)

TALENT DEVELOPMENT & ATTRACTION

Learning and Development

We focus on improving our people’s core functional skills and enhancing their abilities in digital and innovative areas. Our strategy is not only based on educational programmes delivered through online and offline courses, but also through active engagement with our people. By providing opportunities for self-directed learning and growth, we empower individuals to drive their own career progression.

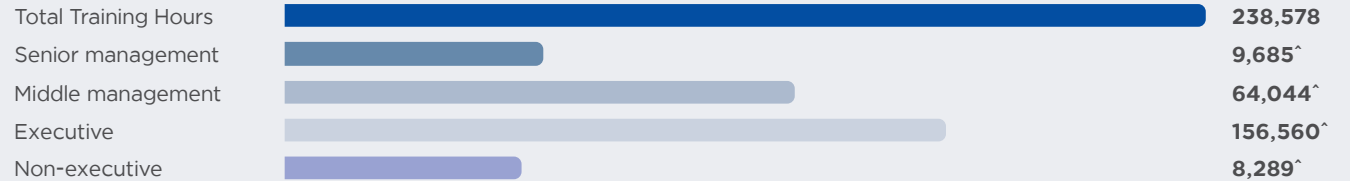
Amidst rapid technological advancements, it is paramount for our people to constantly upskill and acquire new knowledge. To address this demand, the Group is proactive in offering technical training programmes which leverage technology to deliver learning experiences in various formats, encompassing both virtual and in-person modalities.

A notable initiative is the Axiata Fast Forward (AFF) learning platform, which underscores the importance of continuous learning and upskilling in today’s dynamic job market. By providing our people with access to curated learning opportunities and integrating with popular online learning platforms from seven virtual academies, Axiata demonstrates its commitment to investing in talent development and staying competitive in the industry. The seven academies are Governance & Regulatory, Customer Experience, Finance & Business, Ways of Working, DigitalTech & Analytics, Sales & Marketing and Leadership & Management.

The emphasis on certifications in areas such as cyber security, AI, and data science reflects the growing demand for specialised skills in technology-driven fields. Our people have found these resources beneficial and have voluntarily pursued skill certifications as remote learning continues to gain traction.

In addition, we have launched two group-wide initiatives, the Learning Month and the Digital Month. These initiatives encourage us to broaden and advance our skills by taking ownership of our development. Axiata’s Telco-TechCo transformation, ensures we remain relevant and ahead of the curve.

Total Training Hours by Employee Category



Notes: ¹ Training includes all types of vocational training and instruction paid educational leave provided by a company for its employees, training or education pursued externally and paid for in whole or in part by a company and training on specific topics. Training does not include on-site coaching by supervisors
² An employee is defined as an individual who is in an employment relationship with the company, according to national law or its application
³ Employee category, refers to the breakdown of employees by level (such as senior management, middle management) and function (such as technical, administrative, production)
⁴ This data was subjected to external independent limited assurance. Refer to the independent assurance report on pages 138 to 139

ADA Academy



Number of Talents Recruited and Nurtured:

22 Young Graduates

Targeted Markets:



Malaysia



Indonesia



Thailand

Core Modules:

Media Planning & Buying | Marketing Automation | Marketing Data & Analytics

The ADA Academy, the pioneering cross-border digital marketing young talent development initiative, cultivated the potential of 22 talents, transforming it into boundless possibilities. Our ambitious Academicians embarked on a comprehensive two-stag, 360-degree digital marketing bootcamp in less than six months. This training equipped them with the skills and knowledge to navigate and excel in the ever-evolving digital landscape. As a result, they emerged prepared to make meaningful contributions to the industry.

Stage 1: Immersive Learning Journey

During this three-month phase, all participants receive mentorship from top digital media experts within ADA, and earn digital certificates from renowned platforms like Meta and Google. They also gain the theoretical knowledge to master the realm of digital performance media through case studies and hands-on projects.

Stage 2: Real-World Practical Experience

Successful participants from stage 1 shadow ADA teams, gaining real-world practical experience by actively contributing to actual client campaigns for three months.

After completing both stages and a final interview, participants can begin their careers at ADA. Those who successfully pass both stages and the interview are offered positions at ADA.

TALENT DEVELOPMENT & ATTRACTION


Mandatory Compliance Training Programmes

We prioritise compliance training initiatives involving nearly everyone in the Group to maintain standards and enhance skills. This commitment is rooted in integrity, guiding every decision and action we take.


Training Programme	Attendees
Data Privacy Refresher	All Employees
Cyber Security Refresher	
Enterprise Risk Management	
Speaking Up/ Whistleblowing	
ABAC Refresher	Existing Employees
ABAC	New Joiners
Code of Conduct	
Digital Trust	

Telco and Technological Trends Training


We further empower our people with comprehensive training at the intersection of Telco, Tech, Analytics, and AI. It equips them with the skills and knowledge essential to navigate and thrive in today's rapidly evolving digital landscape.



- Our comprehensive training programmes aim to empower an AI culture in Axiata, covering critical skillsets within the AI Factory to address talent shortages in the industry. This includes making AI knowledge accessible to all employees, addressing diversity, equality and inclusiveness and promoting talent retention and acquisition. Additionally, to better equip Axiata's talent to lead the AI & ML Ops project and as part of the company's Digital Transformation journey, Axiata Group Analytics (AGA) and Amazon Web Services (AWS) collaborated to organise a skill gap analysis, which involved the participation of over 300 talents




- Robi places a strong emphasis on Analytics & AI Training as critical components of skill development for its resources, investing significantly in developing its employees' analytics and AI capabilities through the following in-person classroom training:
 - Data Analytics Phase 1**
28 selected individuals underwent tailored Data Analytics Phase 1 training facilitated by an external trainer to align with their non-technical backgrounds and job roles' requirements
 - Data Analytics Phase 2**
28 personnel from the Market Operation team participated in the Data Analytics Phase 2 training conducted by an external trainer, to obtain the necessary data analytics expertise to make data-driven decisions
 - AI Democratisation**
36 members from the Market Operation, Technology, and Corporate Strategy Division joined the AI Democratisation training led by Robi's internal Analytics Centre of Excellence Team, focusing on enhancing analytics skills and knowledge through practical use cases in Q4 FY2023




- ADL took the initiative to host a series of Telco trainings across the practices to empower internal trainers and foster collaboration with other OpCos. The training was pioneered by Telco Solutions Practice in ADL, which was then expanded with assistance from Dialog subject matter experts to involve more than 110 cross-practice teams. These in-person training sessions garnered an overall NPS feedback rating of "Very Good"

Agile Methodology Training

Our training in Agile Methodology enables our people to adapt and innovate swiftly in the dynamic digital realm to navigate today's challenges.



- The People Development team organised a two-day Certified Scrum Product Owner training on the 15 and 16 May 2023. The training was facilitated by a certified external trainer. With 30 participants from multiple divisions across the Group attending, the training enables individuals to balance the various stakeholders' demands, develop a product vision, and make informed decisions to meet customer needs, thus, enhancing the organisation's agility



- To drive the Agile transformation within ADL, an Agile Training Programme was offered to 35 selected participants. Serving as "Agile Change Agents" across all practices, they underwent guided training by an experienced Agile coach. This comprehensive hybrid programme, comprising group activities and ongoing assessments, runs from 2023 to 2024, ensuring the effectiveness of the training

Targeted Training Initiatives

In addition to technical requirements, we have implemented targeted training initiatives that strategically addressed the OpCos and Group's needs. Our **Corporate Centre** Functions are constantly developing and providing specialised training programmes for capability building, ensuring that our talents remain relevant and current with the knowledge industry and changes. In 2023, as part of its preparation for the launch of Digital Bank, **Boost** prioritised specific essential training initiatives for its employees such as Power Pivot Beginner, AWS Certified Cloud Practitioner Essentials, AWS Certified Solutions Architect – Associate, AWS Security Specialty Certification and CFA Level 1, among others.

EMPLOYEE HEALTH, SAFETY & WELLBEING

The evolving landscape of work underscores the need for companies to establish environments that are conducive to the mental and physical wellbeing of employees. As our people are central to our operations, the Group strives to provide a safe work environment and enhance the health, safety and wellbeing of all employees and stakeholders.

Why Is This Important

As a responsible employer, our employees rely on us to establish a conducive work environment, with comprehensive safety regulations and protocols to keep them safe from health and safety hazards while ensuring that prompt and appropriate actions are taken to mitigate incidents when they arise.

Outlook

In the future, Axiata and its OpCos will focus on enhancing employee health, safety and wellbeing. We remain committed to looking after our people and will actively monitor our health and safety indicators to effectively address any issues. Additionally, our digital businesses will introduce more Occupational Health and Safety (OHS) initiatives to foster a culture of safety across Axiata.

Our Approach

We are committed to strictly adhering to all environmental, health and safety laws and regulations to create a safe work environment that prioritises physical and mental wellbeing. Employees are given access to a wide range of initiatives and programmes designed to improve safety, work-life balance and enhance physical and mental wellbeing. Axiata is committed to complying with all relevant local health and safety laws and regulations while improving its management systems to protect its people. Our commitment towards health and safety is reflected in the Axiata Group Berhad Safety Policy with respective OpCos tasked with continuously executing and reviewing their OHS policies and management systems. This ensures that employees fully understand and comply with these policies effectively.

In addition to local regulations, our OpCos also adhere to international standards and management systems, such as the Occupational Health and Safety Assessment Series (OHSAS) certification and ISO 45001:2018.

The following OpCos have attained ISO 45001 Occupational Health & Safety (OHS) Management System certification:



For our operations in Malaysia, Bangladesh, Pakistan, Cambodia, Philippines and Myanmar

Moreover, the Health and Safety Committees of OpCos implement efforts to raise awareness of OHS to minimise injuries, accidents and exposure to health risks. Our Group People Function Circles facilitate Group-wide cross collaboration and knowledge sharing through the Wellbeing Circle, a platform dedicated to continuously supporting employee wellbeing and implementing New Ways of Working strategies.

Our Progress

Health & Safety

We remain committed to identifying and mitigating operational hazards and risks to ensure the safety of our people, prevent injuries and comply with OHS standards. Axiata prioritises safety across its operations by implementing Environmental, Safety and Health (ESH) systems and monitoring processes.

Our OpCos conduct regular reviews and internal assessments to identify risks and take the necessary measures to mitigate them. While most of our operations occur in the office and retail environments, EDOTCO faces higher safety risks due to the nature of its operations, including working at height or performing electrical work for network construction and maintenance. To mitigate these risks, our suppliers must adhere to the health and safety requirements outlined in our Supplier Code of Conduct.

We prioritise employee training programmes to enhance awareness and knowledge of safety and health matters. Refresher courses are mandatory for employees in high-risk roles, such as those involved working at height or in emergency response. Moreover, site supervisors undergo Competency Programme sessions to ensure compliance with safety standards and regulations.

Additionally, we disseminate general health and safety information regularly across OpCos to ensure that employees clearly understand and implement operational health and safety practices. Digital systems are also utilised to monitor risks, accident data and the enforcement of organisational performance measures to achieve health and safety targets.

Number Of Work Related Fatalities	Lost Time Incident Frequency Rate (LTIFR)	Number of employees trained on health and safety standards
Zero	0.04	5,906

EMPLOYEE HEALTH, SAFETY & WELLBEING

CASE STUDY



In its commitment to embedding a safety culture and preventing injuries and fatalities, EDOTCO intensified its efforts to foster a safe environment for everyone. National Tower Companies (NTC) have an established OHS committee overseen by the Director of Operations. These committees comprise employee and management representatives who meet every quarter to discuss safety issues and action plans.

In 2023, the HSE committee implemented the following activities to enhance OHS:

- Continuous training sessions
- Inspections (Minimum 10% of total sites)
- Hazard reporting/observations
- Yearly Vendor Performance Evaluations (VPE)
- Quarterly OHS Committee Meetings
- Monthly Joint OHS Audits (EDOTCO & Vendors)
- Quarterly Audits (By OHS Committee)
- Emergency Response Exercise/Drills (NTC's Office)

To identify and mitigate risks, EDOTCO's OHS committee reviews all activities listed in the Hazard Identification, Risk Analysis and Risk Control (HIRARC) Document.

Enhancing Safety Knowledge

EDOTCO provided comprehensive health and safety training for employees and vendors to enhance awareness and equip them with the proper knowledge. The following is a list of OHS training implemented during the year:

- Working at Height - Competency course
- Induction - Competency course for all
- Electrical safety - Competency for field staff
- First Aider & Fire Fighting - Competency for ERT
- OHS Coordinator - Competency course
- Ergonomic training & assessment
- Road safety - Defensive driving

In 2023, EDOTCO implemented a Working at Height Competency programme, Vendor Site Supervisor Development programme, Incident Management programme for field staff and OHS monthly report writing workshop.

A total of **2,548** employees attended **57** training sessions.

EDOTCO also implemented programmes to promote physical, mental health and wellbeing among employees through the OHS School programme, conducting a total of 12 sessions across all NTC. Additionally, OHS week was conducted in November 2023, featuring activities including an office evacuation drill, talks on mental health, firefighting and rescue, OHS seminar and dialogue with third parties, blood donation drives, wellness/fitness programmes, working at height demonstrations, and awareness session, along with a quiz and contest.



Empowering our Team with Safety Training Initiatives



To cultivate a robust safety culture and mitigate risks, Robi's Health and Safety Committee has been pivotal in driving continuous improvement towards achieving its safety objectives for 2023. The committee assigns specific action roles to each member, fostering a proactive and effective approach to health and safety. Quarterly meetings are held to address safety initiatives and propose new ones involving various cross-functional divisions and stakeholders.

In 2023, the committee reviewed safety processes and policies and introduced the Robi Health and Safety Framework. Additionally, the committee played a significant role in overseeing the relocation project of Robi's Corporate Office, conducting a pre-launch safety inspection at the New RCO - The FORUM. The committee also spearheaded regular floor-wise safety awareness activities and contributed to the planning and execution of the Robi Health and Safety Week 2023.

Robi Health and Safety Week

- Encompassed topics such as nutrition, diabetes awareness, ergonomics, fire safety, work environment safety and road safety
- Aimed at equipping employees with valuable insights and skills to protect their overall health and safety

Health & Safety Training

During the year, Robi focused on promoting employee safety and wellbeing through an extensive series of health and safety training programmes, comprising fire and earthquake preparedness, first aid training and safe driving training.



700
Employees

received training on health and safety standards.

EMPLOYEE HEALTH, SAFETY & WELLBEING

Building a Safety Culture



Various safety initiatives were implemented in 2023 to enhance employees' safety knowledge and skills to mitigate hazards throughout its operations.

- Visual and hearing medical screening
- Screening for Thyroid Cancer
- Monitored harmful radiation levels in four high-rise buildings in Urban Colombo city
- Developed the OH&S web portal incorporated with new topics, including ergonomics and fire safety principles
- Examined the Indoor Air Quality of five buildings (CO₂, CO, temperature, O₂ levels) and light levels of one building, which was refurbished in 2020. These checks were conducted by the National Institute of Occupational Health and Safety, Sri Lanka
- Updated the OH&S Policy to comply with ISO 45001:2018 and completed the OHS Management System Master Manual
- Developed guidelines for OH&S-related topics (e.g. medical emergencies, natural disasters, etc.)
- Initiated an OH&S induction training for students graduating from the vocational training centre as part of Dialog's Community Service programme

Employee Wellness & Wellbeing

Axiata recognises the importance of ensuring employees' physical and mental health and wellness. Throughout the year, we implemented initiatives to engage with our employees and address their needs. The following are initiatives undertaken across OpCos to promote physical and mental wellbeing.

Enhancing Employee Health & Wellness



ADA prioritises the wellbeing of its employees by dedicating an entire month each year to Health & Wellbeing initiatives. In 2023, ADA's goal for Health & Wellness Month was to further develop a culture of health and wellness within the organisation through fun and engaging activities to meet ADA employees' diverse interests and needs. ADA implemented the initiatives below:

• ADA Fitness Challenge

Employees at ADA formed groups of five and participated in a series of fitness challenges over five weeks, competing for the title of ADA's fittest team. Each team comprised members of both genders and one manager. The challenges varied each week throughout the five-week period, as shown below:

	Week 1	Week 2	Week 3	Week 4	Week 5
ADA Fitness Challenge	Triceps & Shoulders	Abs	Biceps & Chest	Legs & Glutes	Total Step Count

• Health & Wellness Communication

ADA conducted an internal panel session and disseminated useful resources to employees on various themes every week on topics such as work-life balance, ergonomics and posture, work environment mindfulness, emotional wellbeing, and healthy work environment and relationships.

• Team Building with Wellness In Mind

ADA's leadership team trained together to climb Mount Kinabalu, the highest peak in South East Asia to strengthen their bond and wellbeing.



- Organised Mental Health Month to heighten awareness of the importance of mental health at home and at work



- Smart organised two employee marathons to encourage physical activity through sports and to motivate employees to adopt a healthy lifestyle



- Conducted a Wellness Seminar, which garnered a positive response, showing increased awareness among employees



- ADL executed a three-pronged approach to promote physical and mental wellbeing among its employees, offering comprehensive wellbeing support, holistic wellbeing initiatives and physical wellbeing programmes:
 - **Comprehensive Wellbeing Support** – includes coverage for employees' medical, life and accident insurance, special COVID-19 care, and thoughtful gestures like "Get Well Soon" gifts
 - **Holistic Wellbeing Initiatives** – provides support for work-life balance, health screenings, fitness programmes, team gatherings, flexible benefit plans, learning opportunities and lifestyle initiatives across all locations
 - **Physical Wellbeing Programmes** – encompasses an exciting range of sports and fitness activities for employees, including Zumba and yoga sessions, mini soccer events and Pound Fit in Indonesia. Employee participation was at an all-time high across all locations in Sri Lanka, Malaysia and Indonesia

COMMUNITY DEVELOPMENT

Axiata’s commitment to leveraging our presence across diverse markets is rooted in a deep understanding of local needs, a dedication to making a positive impact, and a belief in the power of collective action to drive meaningful change. By working hand in hand with communities, stakeholders, and partners, we aspire to create a brighter future for all.

Why Is This Important

We see ourselves as part of the communities we serve, and take that responsibility seriously. By focusing on long-term sustainable development, we aim to create lasting impacts that benefit everyone. Through community engagement and investment, we listen closely to local stakeholders, working to enhance the quality of life for every individual. We aim to ensure that everyone feels valued and supported along the way.

Outlook

Across Axiata Group and Axiata Foundation, we aspire to build a digital society where everyone thrives. We aim to achieve this goal through identifying genuine local partnerships across our markets with governments, businesses, and non-profit organisations worldwide. Our upcoming focus centres on empowering youth and local communities through enhanced digital, financial, and environmental literacy.

Our Approach

We aspire to build a future where everyone can thrive in a world undergoing rapid digital transformation. To make this happen, we engage closely with local partners, leveraging the unique strengths of our OpCos to tailor projects to the distinct needs of communities across our markets. Through our work with the Axiata Foundation and various initiatives across our OpCos, we are committed to making a positive difference in advancing Asia. We spearhead community programmes and initiatives, focusing our efforts on the following key areas:

Our Programmes

- Education**
Nurturing Future Leaders & Providing Quality Education
- Community Investment**
Uplifting the Quality of Life for Communities (Including Connecting to Basic Utilities)
- Environment**
Building a Healthier Planet Through Collaboration and Advocacy
- Promoting Digital Advancement**
SNCR, Digital Inclusion on page 39
- Supporting Disaster Management and Response**
SNCR, Emergency & Disaster Response on page 86

Our Progress

At the heart of **Axiata Foundation’s** mission is the dedication to building an inclusive and sustainable digital society through the power of connectivity. We deeply understand that genuine change necessitates collaboration. That is why we actively seek partnerships with organisations and individuals who share our vision for a better world. Through these strategic collaborations, we develop scalable solutions to make a positive difference in global communities. We believe in the profound ability of connectivity to transform lives for the better, guiding our work and inspiring us to create impactful change in communities worldwide.

Contributed a value of **RM16.5 million**, enriching the lives of **13,415 individuals** across various demographics through the Axiata Foundation.

Axiata Foundation		
Our mission is to pave the way for a digitally inclusive future where our communities thrive. We do this via three focus areas, where our programmes address specific community needs and empower greater self-sufficiency.		
Focus Areas		
Education Nurturing young generations with critical skills to develop them into future digital leaders.	Community Investments Providing sustainable solutions to elevate quality of life for underserved and marginalised communities.	Environment Building a healthier planet through collaboration, advocacy and innovation.
Amount of Investment		
RM12 million	RM3.3 million	RM1.2 million
Number of Beneficiaries		
3,747	8,258	1,410

Axiata Foundation’s UN SDGs



Refer to website [here](#)



COMMUNITY DEVELOPMENT

Employee Volunteerism

Our community initiatives at Axiata are powered by dedicated volunteers from both Axiata and our OpCos. Their commitment breathes life into the Group's collective efforts, allowing us to connect with communities meaningfully. Through their actions, our volunteers represent and demonstrate Axiata's purpose and shared responsibility to make a positive impact wherever we can.

Empowering Change Through Our AxiataCares Volunteers



In Malaysia, the AxiataCares Volunteers (ACV) embodies the Group's commitment to unity and collaboration. The programme brings our people together, fostering a collaborative environment where every input is acknowledged and appreciated amidst mutual respect and support. Beyond the confines of the workplace, ACV empowers our people to embark on a journey of personal and professional growth. Through hands-on experiences and meaningful interactions, our people have the opportunity to develop essential skills such as leadership, communication, and teamwork.

With **238 dedicated volunteers on board**, ACV has made a significant impact by dedicating over **4,112 hours** to meaningful initiatives to-date. Their commitment has made a lasting impression on Malaysia's B40 and underprivileged communities, showcasing our collective commitment to creating positive change where it matters most.

Throughout 2023, **133 ACVs** volunteered their time, contributing **147 hours** to support Axiata's Community Investment and Environmental initiatives.



Axiata Volun-tastic Day by Axiata Foundation



With the dedication of **78 AxiataCares Volunteers (ACVs)**, we conducted five programmes simultaneously at various locations across Malaysia in collaboration with our existing partners, both physical and virtual, demonstrating our unwavering commitment to creating a positive impact on the community.

Impacts:

- Volunteering hours - **23 Hours**
- Amount invested - **RM16,650**



Initiatives	Key Highlights
Small Changes: Tuai Kasih Virtual Learning	11 ACVs conducted virtual sessions via Zoom to educate orphans from Rumah Raudhatul Al-Faez on English comprehension, social awareness, internet safety and digital literacy. Benefitted: 20 Orphans
Saora x EDOTCO: Seeds of Unity	12 ACVs made a difference by helping the Orang Asli Community at Kg. Sungai Kepong to install solar streetlights and plant pineapple saplings. Benefitted: 85 Orang Asli families
MRA Basic Sign Language & Treasure Hunt with the Hearing-Impaired Community	21 enthusiastic ACVs learned basic sign language and engaged in interactive communication through a lively treasure hunt activity organised by AF and the Malaysian Relief Agency (MRA). Benefitted: 17 hearing-impaired Individuals
MIASA: Outreach Programme with the B40 group & Homeless Folks	19 ACVs joined forces with the Mental Illness Awareness and Support Association (MIASA) Malaysia to extend care, assistance, and mental health support to the homeless community. They also distributed groceries to B40 families and homeless individuals, actively participating in packing and distribution. Benefitted: 100 homeless families
TrEES x Yayasan Bursa Malaysia: Building Resilience of Orang Asli at Carey Island & Protecting the Natural Environment Supporting Them	15 ACVs partnered with Treat Every Environment Special Sdn. Bhd (TrEES) and Yayasan Bursa Malaysia to plant coconut saplings on the Orang Asli farm at Kg. Orang Asli Sungai Bumbun and mangrove saplings at the Kg. Melayu jetty area on Carey Island. Planted: • 310 coconut saplings • 210 mangrove saplings

Read more information about Axiata Volun-tastic Day [here](#)

COMMUNITY DEVELOPMENT

Making An Impact Through Our OpCos

By embracing the intertwined spirits of volunteerism and creativity, we embark on a journey of collaborative action, pooling together resources and expertise across our OpCos to spearhead transformative change through joint initiatives focusing on funding and donations.

Empowering Fund



The Empowering Fund initiative catalyses community engagement and corporate culture integration, aligning OpCo's values with social responsibility. Active participation and investment in local initiatives for various societal needs, foster profound connections between employees and communities. This stimulates economic growth and cultivates a culture of empathy and positive impact within the organisation.



Recipient of CSR Award 2023

Recognised for outstanding Corporate Social Responsibility efforts.

Annual NGOs Collaboration

Collaborated with Sokola Institute, Yayasan Menembus Batas, and Inisiatif Bisnis dan Ekonomi Kerakyatan (IBEKA) in 2023.

First Squad, through its corporate culture programme, plays a crucial role in fulfilling corporate social responsibility objectives, earning points for completed challenges. These points are converted into funds and directed towards non-profit organisations and social businesses, making a tangible and compassionate impact.

[Read more information about Link Net's Empowering Fund here](#)

Karuna.lk Mobilising and Connecting People for Good



Karuna.lk, a collaborative effort between Dialog Foundation, the Sarvodaya Shramadana Movement, and PwC Sri Lanka, represents a significant mobilisation of goodwill in Sri Lanka. Serving as the country's first crowdfunding platform, it epitomises a collective spirit of compassion and solidarity.

Through its innovative approach, Karuna.lk seamlessly connects verified non-profit organisations and causes with individuals eager to extend a helping hand. The platform provides flexible funding options for campaign organisers, including debit/credit cards, eZ Cash, Dialog add-to-bill, and online bank transfers, while empowering donors to make a meaningful impact and ensuring that support reaches those in need. Rooted in the ethos of social stewardship, Karuna.lk extends its reach beyond financial transactions, offering a lifeline to organisations and local businesses often overlooked by traditional funding sources.

With PwC's commitment to transparency, every donation carries the promise of accountability, ensuring that funds flow directly to beneficiaries. From healthcare to education, emergency relief to environmental conservation, Karuna.lk aids a broad spectrum of social causes, reflecting the diverse needs of Sri Lankan society. The platform opens avenues for all to contribute towards building a brighter future for Sri Lanka, one act of kindness at a time.

[Read more about Dialog's Karuna.lk here](#)



LKR 22,803,069.61

Donations Raised

256

Fundraising Campaigns

9362

Patrons

150

Organisations

Nurturing Future Leaders & Providing Quality Education

We recognise today's youth's immense talent, energy, and creativity, and believe in investing in their development to shape a brighter future for all. Through mentorship, guidance, and access to meaningful learning opportunities, we strive to equip the young generation with the skills, knowledge, and values they need to thrive in an ever-changing world.

Future Leaders (XLFL)



After a decade of unwavering commitment to nurturing Indonesia's future leaders, XL Axiata's XL Future Leaders (XLFL) programme officially concluded in 2023. Its aim was to develop Indonesia's young generation and prepare them to become future leaders who are not only intellectually strong and capable of competing at the global level but also groomed with professional and soft skills. In addition, this scholarship programme was crafted with a curriculum specifically tailored to meet the needs of young Indonesian leaders in facing global competition. The programme was conducted by professional facilitators using face-to-face and distance learning methods.

XL's Impact (2013 - 2023)



>350,000

Youth Beneficiaries



>60

Universities



168

Roadshows and Connected with **38,256** Beneficiaries



1,500

XLFL Alumni



177

Social Innovation Project



>72,000

eLearn.id Beneficiaries



95

Internet of Things (IoT) Project

[Read more about XL Future Leaders here](#)

Utilising IoT for Economic Empowerment

Through its Pesantren Digital (digital boarding school), XL nurtured students by focusing on technology utilisation, especially on IoT that leads to positive economic impact. One of the outcomes of the initiative was the digitalisation of organic waste by using X-Maggot prototype, an IoT based solution for maggot-based waste management. The system controls the temperate and humidity, while an AI based system continuously calibrates to identify the best environmental conditions.

COMMUNITY DEVELOPMENT

With this, Axiata Group Berhad has pledged RM115 million to Axiata Foundation for its Education Pillar initiatives over the next ten years (2022-2031) to promote accessible quality education and nurture young Malaysian talents. By investing in the potential of the young generations, we are investing in the future prosperity and wellbeing of our communities and the world at large.

Axiata Young Talent Programme (AYTP)

The Axiata Young Talent Programme (AYTP) aims to equip young Malaysians with leadership and business capabilities to be highly employable to become future corporate leaders. Established in 2012, the AYTP has benefitted **2,456 Malaysian youths** as of 2023 through various initiatives tailored to enhance their leadership capabilities and employability. These programmes provide participants with the tools and knowledge necessary to emerge as future leaders in the corporate sphere, contributing to Malaysia's socioeconomic development.



School Leadership Development Programme (SLDP)

Five-year programme exclusively provided to selected high potential Maktab Rendah Sains Mara (MRSM) students who are the beneficiaries of the Back To School (BTS) programme and students at Kolej Yayasan Saad (KYS).

- **430** new students benefitted from the programme in 2023
- **1,100** students have been nurtured through SLDP its since inception in 2011

University Leadership Development Programme (ULDP)

Two-week leadership development programme for Malaysian undergraduates studying locally or abroad that provides its participants the opportunity to learn critical skills and business knowledge required of a future CEO.

- **59** new undergraduates enrolled in 2023
- **895** university students have been developed through the ULDP since 2013

Young CEO Development Programme (YCDP)

The one-and-a-half-year leadership development programme aims to equip Malaysian youths with essential values, critical skills and leadership qualities to transform them into world-class CEOs.

- **125** active participants as of 2023
- **451** young professionals have been developed through the YCDP since 2012

Moreover, all AYTP participants will automatically become part of the AYTP Alumni Association > Emerging Leaders Asia. This vibrant platform is specifically created to empower and foster connections among AYTP alumni participating in the prestigious AYTP programmes. Besides providing a supportive network and access to resources, the platform enables alumni to stay connected, exchange insights and collaborate on initiatives aimed at driving positive change in their communities and industries.

The AYTP Alumni Association > Emerging Leaders Asia's alumni network has grown to **about 2,000 members**.

[Read more about the AYTP here](#)

SmartEdu University Student Development Programme (SmartEdu USDP)



In 2023, Smart continued implementing its SmartEdu USDP, which aims to foster Cambodia's next generation of corporate leaders in Cambodia. Nurturing values and critical competencies essential for resilient corporate digital leadership, SmartEdu USDP is an intensive boot camp that equips participants with the necessary skills and knowledge to navigate challenges and seize opportunities in rapidly evolving digital environments. The programme emphasises a learn-by-doing methodology to ensure participants gain theoretical knowledge and practical skills. Through hands-on experiences and practical challenges, participants develop insights into the dynamics of the business world, preparing them for success in today's competitive landscape.

48 students enrolled in the SmartEdu USDP for the academic year 2023

Total SmartEdu USDP Alumni Students **240 (5 cohorts)**

SmartEdu USDP Participants' Endorsement

Strong likelihood of recommending this programme to others at 9.69 .	Significant positive impact across study, career, business, and personal life at 8.71 .	Remarkable knowledge and skills boosted at 8.49 post-programme, compared to previous average of 5.47 .	11 students graduated and are currently holding leadership positions such as managing director and other leadership roles.
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[Read more about SmartEdu USDP here](#)



COMMUNITY DEVELOPMENT

Axiata Equity-in-Education Fund (AEIEF)



We believe in ensuring equal opportunities for a better education for all. Axiata is committed to leading the way as a forward-thinking organisation, supporting future generations through a wide range of educational initiatives. Through strategic partnerships, innovative programmes, and community engagement, we actively strive to remove barriers to education, ensuring that no individual is left behind.

Initiatives	Key Highlights for 2023
Back-to-School (BTS) 1.0 and 2.0	<p>Aids underprivileged students in pursuing their education comfortably by providing them with the necessary resources and access to leadership development opportunities through the School Leadership Development Programme.</p> <p>BTS 1.0 (Phase 2) Three zones in the east coast regions of Kelantan, Terengganu, and Pahang were selected for the School Leadership Development Programmes for MRSM schools.</p> <p>BTS 2.0 (Phase 1) 700 deserving students each from SBP and MRSM schools will receive essential school supplies, ensuring they have the tools they need to excel academically.</p> <p>More than 2,600 students to date have benefitted from the BTS programme:</p> <ul style="list-style-type: none"> • BTS 2022 Phase 1 & 2 - 692 • BTS 2023 Phase 1 - 1,391 • BTS 2023 Phase 2 - 533 (Southern and Eastern only)
Edutuition (Previously Tuisyen Pintar)	<p>Assisted in organising supplementary academic classes aimed at enhancing the academic performance of average-performing students from underprivileged communities residing near MRSM tuition centres. These students, coming from neighbouring schools of AF-sponsored tuition centres, benefit from attending ten tuition classes conducted by MRSM teachers across MRSM Bentong, MRSM Bera, MRSM Transkrian, and MRSM Jeli.</p> <p>Benefitted: 400 Form 5 students</p>
Enterprise Data Practitioner (EDPP)	<p>Implemented a comprehensive digital upskilling and reskilling programme focused on cultivating skilled digital leaders for the 4th Industrial Revolution and beyond. Through workshops, we foster essential values, attitudes, and critical skills. Participants developed proficiency in Microsoft tools, big data analytics, data visualisation, and data storytelling, equipping them with the necessary digital competencies to excel and lead in the digital specialist's domain.</p> <p>For Cohort 2 (2023), 45 individuals were initially onboarded. As of June 2023, 43 individuals have successfully completed the programme.</p> <p>Cohort 3 (2023): Onboarded - 36 Completed - 33</p>
All-Star Bestari Scholarship	<p>Aims to empower students from underprivileged backgrounds and marginalised communities to pursue their pre-university and undergraduate studies whilst nurturing their potential beyond academics.</p> <p>11 undergraduate students 24 pre-university students</p>
All-Star Bestari Scholarship for School (KYS)	<p>Provides a five-year secondary school scholarship at Kolej Yayasan Saad (KYS) to high-potential students from underprivileged backgrounds, enabling them to achieve academic success and nurturing their development beyond academics.</p> <p>3 secondary school students</p>

Uplifting The Quality Of Life For Communities

We are dedicated to enriching community life by improving access to a wide range of basic needs, fostering socioeconomic improvements and encouraging social, educational, and digital participation within our community.

Empowering Communities Through E-Learning



Robi's latest CSR initiative, Haate Kolome, provides e-learning courses aimed at supporting struggling youth. These free training programmes are accessible on Haate Kolome's YouTube channel, Facebook page and website, reflecting Robi's commitment to fostering self-belief, as embodied in their motto, "Believe, You Can". Looking ahead, Robi plans to expand the platform by introducing additional courses such as graphic design, housekeeping, plumbing and electrician work since its launch in December 2023.

- **Enriched 20,000 lives** through its Facebook page and YouTube channel by offering courses in mobile repairing and caregiving

Enabling Access to Safe Drinking Water

Bangladesh faces a water crisis in certain areas. Collaborating with WaterAid Bangladesh and Bangladesh Railway since 2011, Robi has been working to supply safe drinking water across significant railway stations in the country.

- **Benefitted: Over one million** railway passengers in 10 railway stations
- Total annual investment for maintenance: **BDT4 million**

Supporting Infant Nutrition



ADL Heartbeat donated essential items to the Sarvodaya Suwasetha Nutrition Centre, Moratuwa, in March 2023, an orphanage focuses on infant nutrition, catering to babies under the age of 4. Additionally, the contribution included extra items donated by employees.

- **Benefitted: 25 infants** under their care

Enhancing Young Patients' Healthcare

ADL Heartbeat provided supplies of essential drugs and surgical consumables to Lady Ridgeway Hospital, Colombo, in October 2023. In addition to vital medical provisions, the ADL team collected storybooks, drawing books, and stationery for the children undergoing medical treatment in LRH.

- **Benefitted: 550 young patients**

COMMUNITY DEVELOPMENT



Jalanan Kasih Murni

CelcomDigi x UTHM x Planet Mahir

Provided essential online business and IT literacy training, along with hybrid SPM tuition classes in Pos Orang Asli Kuala Mu, Sg. Siput, Perak in partnership with Celcom, Planet Mahir, and Universiti Tun Hussein Onn (UTHM).

Benefitted: 1,040 Participants

Impact Borneo

Implemented Atmospheric Water Generation (AWG) technology to provide clean water for essential activities, supplied Air2Water Machines for safe drinking water and installed Community Solar Systems in two longhouses in Ulu Ketibas, Song, Sarawak. Additionally, constructed two new toilets for the Nanga Bulu Longhouse.

Benefitted: 1,248 Orang Asli

Saora Industries: Advancing Rural Communities through Digital Agriculture

Delivered Digital Agriculture Training to the Orang Asli community in Bentong, Pahang, aiming to establish a sustainable livelihood and narrow the socioeconomic disparity within the Orang Asli community. This initiative has boosted local food supply accessibility, increasing in household income by over RM600.

Benefitted: 340 Orang Asli participants

MARA Excellent Ventures: Spaoh Entrepreneurship Development Programme

Facilitated a six-month comprehensive learning courses in mind development, business management, and digital business, empowering 200 participants in Daerah Kecil Kampung Spaoh, Betong, Sarawak, in alignment with the EPU's efforts via the Spaoh District Office.

Benefitted: 800 Participants

QSC Outreach Services: Enabling Life Achievement in Rural Sarawak & Orang Asal Students

Conducted Social & Emotional Learning Programme (SELP) in Sarawak & Perak and a Digital Learning Programme (DLP) in ASDAF, KL. These initiatives effectively instilled core values, encouraged education, and cultivated a strong sense of purpose in the students while simultaneously advancing our goals of nurturing self-efficacy, increasing productivity, and proficiency in Microsoft skills.

Benefitted: 646 Students

Impact Borneo: Empowering Liveability in Rural Sarawak – Socioeconomic Livelihood Project

Executed several transformative opportunities initiatives such as revitalised coconut and Madu Kelulut programmes, Skill development in agriculture knowledge and Branding & Financial knowledge training for the Orang Asal community in Ulu Ketibas and Bintulu, Sarawak. Increased household income by RM650 monthly.

Benefitted: 200 Orang Asal participants

Jalanan Kasih Bakti

Purple Lily

Organised a Women Empowerment Bootcamp and Digital Literacy in Kuching, Sarawak. This programme aims to educate and empower underprivileged women on the importance of understanding women's health-related issues, mental health, and digital financial literacy. It also seeks to enhance the wellbeing of the women community and their families, leading to improved livelihood opportunities.

Benefitted: 158 Women

Make It Right Movement

Supported in bridging the digital gap and improving information accessibility in promoting inclusivity for PWDs with visual impairments.

Benefitted: 70 PWDs

Small Changes Malaysia

Implemented the following initiatives to empower underprivileged students and orphans through enhanced English proficiency, EQ skills, and lifelong educational development:

Tuai Kasih Programme

67 student participants received digital literacy and social media training

Project Beanstalk

38 orphanage students benefitted from this English-focused outreach programme

Seeds of Deeds Programme

155 secondary students were provided with career insights over the four-day course

Benefitted: 70 PWDs

Mental Illness Awareness & Support Association (MIASA)

Guided individuals facing mental health challenges in their recovery journey by promoting supported decision-making, liberty, and autonomy, with a strict policy against coercion and a focus on reducing stigma and discrimination. Provided free medical check-ups and grocery packs, along with suicide prevention training, informational sessions, crisis management, and support for mental health services. This ongoing initiative engaged 30 ACVs and has benefitted 3,350 individuals from the homeless and the B40 Group.

Benefitted:




- **1,020 individuals via Santai Minda Sihat**
- **30 ACVs (as of 27 December 2023)**
- **20 participants from ASIST Programme**

COMMUNITY DEVELOPMENT

Building A Healthier Planet Through Collaboration And Advocacy

We unite stakeholders from diverse sectors through collaborative efforts to promote sustainable practices. Each stakeholder group plays a crucial role in advancing sustainability initiatives, as they bring unique perspectives, resources and expertise. By joining our resources, we advocate policies that protect the environment for future generations.



Change4Climate	Innovate4Earth
<p>Mangrove Conservation Experience Project With the Sabah Wetlands Conservation Society, we aim to educate secondary and university students on environmental conservation whilst gaining hands-on experience. The programme will run until June 2024 with the below targets and progress:</p> <p>Mangrove saplings planted: 2,952 / 6,000</p> <p>Secondary and university students: 540 / 1,500</p> <p>Refer to Sabah Wetlands Conservation Society here</p>	<p>Climate Change Awareness Through Development & Promotion of Captain Eeklim App We supported Sabah's Environment Protection Department's aspiration to expand the Captain Eeklim Mobile Application Game to raise awareness among children aged five to nine years old and communities about climate change and environmental issues in Sabah, including waste management and water pollution through the Captain Eeklim Roadshow and Climate Change Awareness Programme.</p> <p>Benefitted: 400 children from Roadshows Downloads: 400</p> <div style="display: flex; justify-content: space-around; align-items: center;">    </div> <p>Apple Store Google Playstore</p> <p>Refer to SEA Youth Summit's here</p>

SayNo2Waste	Green Wira Programme
<p>Green Bean Environmental Education Programme Alongside Forest Interactive Foundation, students learned to protect and care for the environment via a two-day adventure of learning and fun, with 16 ACVs contributing their time and effort to share valuable environmental knowledge. Through indoor and outdoor activities, the programme aims to nurture young eco-warriors, cultivating their environmental stewardship and honing critical thinking and problem-solving skills.</p> <p>Benefitted: 120 children aged 10 to 12</p> <p>Refer to Forest Interactive Foundation's here</p>	<p>Together with Zero Waste Malaysia, we trained educators in selected schools in Malaysia on sustainability and zero waste living implementation through online modules and webinars. By equipping educators with the necessary skill sets and tools, the project strives to empower the next young generation to build a waste-free and sustainable Malaysia.</p> <p>Benefitted: 50 educators</p> <div style="border: 1px solid #ccc; padding: 5px; margin-bottom: 5px;"> <p>Phase 1: Online Module Training on Open Learning</p> <p>Phase 2: Zero Waste Boot Camp</p> <p>Phase 3 (2024): Programme Implementation for top 2 Projects that received seed funding</p> </div> <p>Refer to Zero Waste Malaysia's here</p>

National Eco-School Competition



Cambodia's National Eco-School competition, jointly organised by the Ministry of Environment (MoE) and the Ministry of Education, Youth, and Sport (MoEYS) celebrates environmentally conscious educational institutions nationwide. The prestigious award, which began in 2012 evaluates various criteria such as green space, recycling programmes, waste management and biodiversity initiatives in public schools, with recognition given to schools that excel in implementing practices in these areas. As part of the national evaluation committee, Smart provided technical and financial support to the winners of the National Eco-school Awards. The top-winning school at the national level was also awarded at the ASEAN level.

Engaged with **31,050** students and **2,924** teachers in **69** schools that applied for the competition in 2023

Smart's Head of Corporate Affairs was the Private Sector Representative, Cambodian Committee Member for the National Eco-school Awards

Project R

In partnership with the Cambodia Rural Student Trust (CRST) and with support from Cambodia's MoE and MoEYS, Smart is actively engaging rural secondary students in Siem Reap Province to educate them on the detrimental impacts of single-use plastics on the environment, and equip them with practical solutions through the 4R principles - Refuse, Reduce, Reuse and Recycle.

32,231 direct beneficiaries in 2023
(**17,334** students since its inception in 2022)

48 Hours contributed by **42** Employee Volunteers

Earth Hour 2023

Since 2012, Smart has been actively involved in the annual global Earth Hour initiative, organised by WWF and Cambodia's MoE, by turning off electricity for one hour as a symbolic commitment to our planet. In 2023, Smart disseminated additional educational messages focusing on critical subjects related to plastic reduction, wildlife conservation, the consequences of illicit environmental activities and the dangers of wildlife meat consumption. These messages successfully reached a significant audience, igniting conversations and inspiring action toward more sustainable living practices.

2,000 people participated in the Earth Hour 2023 event, workshop and seminar

7 million were reached via SMS, while **4.5** million were reached through social media and out of home ads

EMERGENCY & DISASTER RESPONSE

Disasters can have devastating effects on communities, resulting in harm to individuals, the economy and the environment. As a telecommunications and digital business, we understand the importance of our role within communities during times of need. Our services provide essential channels for information, support, and coordination, fostering resilience and connectivity in times of adversity.

Why Is This Important

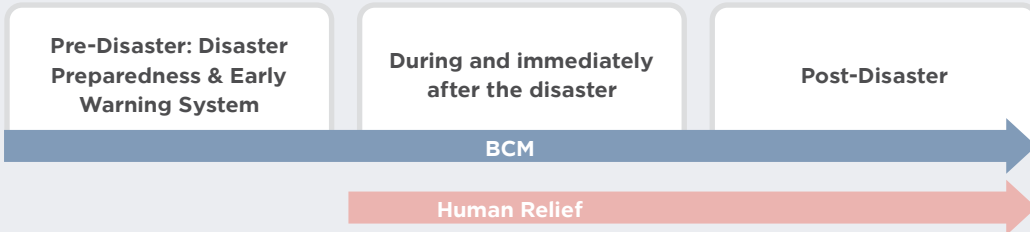
In today's highly networked and globalised society, information communication and mobile technology have emerged as crucial lifelines for governments, humanitarian organisations and individuals alike. Preparedness, early warnings and coordination are key - with the right tools, infrastructure and resources, we can support communities and contribute effectively to humanitarian responses during disasters.

Outlook

We are committed to ensuring uninterrupted service by maintaining reliable connections and providing essential information for effective disaster management. We place a strong emphasis on robust Business Continuity Management (BCM) strategies and actively strengthen ties with local disaster agencies, non-profits, and government entities. Our future efforts will focus on initiating early warning systems aligned with the United Nations' "Early Warnings for All" initiative. The initiative, launched in 2022, aims to ensure that everyone is covered by an early warning system by 2027, a crucial step towards greater security worldwide. As a member of GSMA, we will explore avenues to contribute meaningfully to this vital initiative within our operational reach by leveraging GSMA as a platform for collaboration and engaging in regional early warning initiatives.

Our Approach

At the heart of our Group's operations lies a dual commitment: business continuity and humanitarian relief.



✓ We are fully committed to the ISO 22301 standard, and meticulously embed its principles within the operations of our OpCos.

Each OpCo has adopted a robust BCM Framework and is entrusted with overseeing comprehensive BCM programmes. Through our OpCos, we strive to ensure the continuity of essential services and to serve as a lifeline during times of need.

We also proudly stand as one of the signatories of the GSMA's Humanitarian Connectivity Charter. Through this commitment, we leverage our resources and expertise to improve disaster preparedness, resilience and coordination with the humanitarian sector. We aim to provide timely information to affected individuals, facilitating more effective response efforts between MNOs, governments and NGOs.

In addition, Axiata Foundation's Jalinan Kasih Budi programme and OpCos' activities testify to our unwavering dedication to humanitarian relief. We provide training courses for employees and volunteers across the Group to enhance their abilities in disaster response, emergency aid and humanitarian relief efforts. These initiatives aim to empower individuals to make meaningful contributions to society, especially in support of vulnerable communities.

Our Progress

Pre-Disaster

Disaster Response Preparedness and Early Warning System

Our Group prioritises preparedness for disasters and emergencies across all Operational OpCos, ensuring readiness for potential events like floods or other natural disasters in the countries where we operate. Adopting the ISO 22301 standard, we integrate it into the OpCos, with each establishing a BCM Framework. This framework oversees BCM programmes, business continuity plans, crisis management plans, and related testing and training initiatives.

We emphasise our commitment to bolstering business resilience through clearly defined roles and responsibilities within the BCM structure. Looking ahead, we remain dedicated to maintaining robust BCM strategies through independent review of our BCM programmes, assessing documentation completeness, and conducting comprehensive maturity assessments to validate our BCM controls' effectiveness.

Our Strategy for Organisational Resilience

BCM is as a critical aspect of our Group's organisational resilience, ensuring the continued operation of essential functions during unforeseen disruptions. Our BCM process begins with a meticulous risk identification process and a detailed Business Impact Analysis (BIA) to prioritise critical functions. From there, we develop strategies encompassing various aspects, such as alternate workspaces and clear role definitions.

To minimise the impacts of any disruptions to our operations, we develop plans which include communication protocols and recovery strategies. We also provide employee training programmes and drills to ensure awareness and preparedness at all levels of the Group. Additionally, we conduct periodic testing to validate the effectiveness of our plans, ensuring that we are always ready to respond effectively to any unforeseen events. Overall, we have implemented a range of testing methodologies to strengthen our BCM framework, ensuring a comprehensive assessment of strategies' effectiveness and reliability in diverse scenarios.

EMERGENCY & DISASTER RESPONSE

Pre-Disaster (cont'd)

Our Shared Commitment

Our OpCos are fully dedicated to Business Continuity Management (BCM), demonstrating their shared commitment to utilising frameworks, plans and testing procedures. This dedication ensures organisational resilience and continuity during disruptions. They continuously review and adapt, staying prepared to tackle unforeseen challenges and safeguard operations effectively. The following are among the key initiatives implemented by some of our OpCos to ensure business continuity:



- Implemented a comprehensive BCM programme guided by the ISO 22301:2012(E) and ISO 22313:2012(E)
- Conducted various testing exercises, including a tabletop exercise and disaster recovery testing



- Established a comprehensive BCM policy and framework which oversees the implementation of various business continuity strategy documents, including:
 - Business Continuity Plan
 - Disaster Recovery Plan
 - Emergency Evacuation Plan
 - Cyber Security Incident Plan
 - Crisis Communication Plan
 - Pandemic Plan
- Conducted regular periodic tests, exercises and awareness programmes to ensure the effectiveness of each plan



- Applied a comprehensive process that identifies potential threats to the organisation and assesses their potential impacts on operations
- Structured the processes with the primary objective of ensuring uninterrupted delivery of critical services and products to minimise disruptions and safeguard the organisation's reputation
- Successfully implemented thorough Business Continuity Management System (BCMS) and achieved ISO 22301:2019 standard Certification status post facing a rigorous Audit conducted by a world-renowned auditing body
- This is a testament to ADL's commitment to excellence and preparedness which reflects our proactive approach in mitigating business continuity risks and ensuring the seamless delivery of products/services to our clients



- Adhered to the ISO22301 standard, emphasising a holistic BCM process focused on identifying potential threats and minimising disruption to critical services and products

Our Preparedness in Action

Throughout the financial year, Axiata Group Berhad, alongside its OpCos have actively participated in national-level preparedness initiatives, extending their efforts beyond their regular mandates to ensure community readiness. Their involvement in key disaster preparedness activities has been extensive and diverse, encompassing everything from risk assessment to emergency response planning.

Moreover, the increase in the number of crises and natural disasters related to climate change, coupled with significant gaps in early warning systems in various countries, highlight the importance

of ensuring comprehensive early warning system coverage for everyone. This is a crucial step towards enhancing security within our markets. At the Group level, we have enhanced disaster preparedness by conducting various BCM testing methods and raising cyber awareness among employees.



- Played a significant role in the Government Task Force on Risk Communication and Community Engagement led by UNDP. Other organisations which also played a crucial role in the task force included Red Cross, Health Ministry, A2i and Grameen Phone
- Involved in raising awareness during cyclone and dengue outbreaks utilising social media and SMS broadcasts to disseminate vital information
- Raised awareness through programmes, demonstrating proactive efforts to educate its customers on disaster preparedness



- Implemented the Readiness in Emergencies (RED) framework to effectively manage disaster scenarios. The framework adapts to natural and human-made disasters, including earthquakes, hurricanes, floods and man-made incidents. It incorporates detailed procedures for emergency response, communication and relief efforts



- Focused primarily on preparedness for early prevention, adding another layer of resilience to the group's disaster preparedness efforts



Case Study



Smart's Contribution to Enhancing Climate Disaster Resilience

Since 2013, Smart has played a pivotal role as a committed partner in supporting Cambodia's groundbreaking early warning system, EWS 1294, by issuing timely alerts about upcoming disasters. This initiative has been crucial in mitigating the impact of floods, helping to preserve lives and communities. Leveraging its technological prowess, Smart has effectively disseminated critical alerts through SMS, particularly for flood warnings, as part of its successful second round of pilot testing. This effort ensures that communities are better equipped to handle such catastrophes.

In 2023, Smart's relentless commitment to safety and awareness received accolades from prominent organisations, including the National Committee for Disaster Management and People in Need. This recognition highlights Smart's significant role in bolstering climate disaster resilience in Cambodia.

By focusing on community support and collaborative efforts, Smart is dedicated to further enhancing Cambodia's ability to withstand disasters, aiming for a safer and more secure future for everyone.

EMERGENCY & DISASTER RESPONSE

During and Immediately Post-Disaster

Across various OpCos, a range of proactive measures have been taken to enhance disaster preparedness and response efforts within communities. Leveraging mobile technology, OpCos have implemented early warning systems to rapidly disseminate crucial information via SMS alerts. These systems serve to enhance community readiness and ensure swift responses to potential disasters.

EDOTCO has also implemented an emergency communication process for their alerting system, enabling efficient communication during emergencies.

In instances of specific disaster situations, OpCos have demonstrated effective response mechanisms tailored to the respective countries or regions.



Robi has actively engaged in humanitarian efforts to support the local communities in Bangladesh.

- Collaborating with local administrations, **Robi** distributed relief to **3,000** families in Banshkhali, Chandanaish and Maheshkhali regions of Chittagong, including **113** affected Field Forces who are severely impacted by Cyclone Hamun. **Robi** also deployed portable generators in cyclone-affected areas to sustain network services and enable mobile recharge facilities
- Additionally, **Robi** extended support to **1,300** flood-affected families in the Bandarban district, demonstrating a commitment to comprehensive disaster relief efforts

These initiatives aimed to alleviate immediate suffering by providing essential supplies and assistance to those in need.

Post-Disaster

In our OpCos' post-disaster response activities, we have forged a long-term collaboration with government institutions for effective coordination and humanitarian organisations to enhance support and assistance delivery. **Smart** has established a long-term partnership with People in Need and the National Committee for Disaster Management (NCDM) to develop broadcasting technology in 2023. Meanwhile, **EDOTCO** engages with government institutions such as NADMA and MKN on a case-by-case basis and refers to its Humanitarian Aid Policy for collaborations with humanitarian institutions.

Nurturing Preparedness for A Better Tomorrow

Within our OpCos, we actively maintain dedicated teams that are trained to respond to emergencies and natural disasters, equipping them through specialised programmes, regular drills and real-world experience to ensure swift and effective response.



- Organised a five-day training on BCM led by an international trainer, aimed at equipping staff with essential skills and knowledge
- Implemented designated teams and scheduled drills and training sessions to ensure readiness, coordinate business continuity and oversee facilities and employee safety during emergencies and natural disasters



- Focused on fire drills and training for fire wardens, with periodic refreshers for business continuity programme participants



- Held a disaster simulation in 2023 to assess the effectiveness of their emergency response protocols, which enhanced the preparedness for real-world crises by identifying strengths and weaknesses in their response strategies, ultimately bolstering their ability to protect lives and resources during emergencies



- Prioritised training on emergency response. Fire wardens were also trained in fire safety and first aid measures

EMERGENCY & DISASTER RESPONSE

Response and Contribution During Disasters and Times of Crisis

We were actively involved in disaster relief efforts across our operational areas throughout the past year, demonstrating our dedication to community support:

Case Study



Equipping Volunteers for Disaster Preparedness & Response

In our ongoing commitment to disaster response and community support, Axiata Foundation has forged a significant partnership with the Malaysian Relief Agency since 2022. This collaborative effort has extended beyond contributions to flood relief assistance, encompassing a comprehensive approach towards empowering volunteers and bolstering disaster preparedness initiatives.

Throughout the financial year, Axiata Foundation Community Investments has remained steadfast in its dedication to enhancing disaster preparedness. We have implemented a Basic Disaster Preparedness Workshop in collaboration with the Malaysian Relief Agency. This workshop has served as a pivotal platform for equipping our AxiataCares Volunteers (ACVs) with indispensable skills in disaster preparedness. Participants were provided training in critical areas such as Psychological First Aid. They gained a nuanced understanding of disaster management mechanisms, fostering effective coordination between the authorities and the communities.

2023 ACVS Trained: 11 (57 in 2022)

Impacts

Building Resilient Communities

Minimising Disaster Impact

Facilitating Rapid & Impactful Response

Furthermore, in response to specific disaster situations in Johor and Kedah, the Axiata Foundation, and the Malaysian Relief Agency, swiftly mobilised to provide essential aid to flood victims. This assistance included the provision of hygiene kits, food packs, baby kits, and other urgent necessities. Additionally, the Axiata Foundation contributed to the establishment of mobile clinics, ensuring that affected communities received vital medical attention.

In summary, through our enduring collaboration with the Malaysian Relief Agency and our proactive engagement in disaster preparedness activities, Axiata Foundation reaffirms its commitment to fostering resilient communities and mitigating the impact of disasters through timely and effective response measures.

Case Study



Manudam Mehewara Relief Distribution

The world may have moved on from the COVID-19 pandemic, but the socioeconomic effects of the health crisis linger on families whose livelihoods were impacted by it. As such, Dialog continued to raise funds for vulnerable communities across Sri Lanka through the Manudam Mehewara multi-corporation humanitarian alliance. The initiative was implemented to address food insecurity caused by the economic crisis.



Provided emergency relief of **Rs 324.5 million** to over 120,000 families in need

In 2023, Dialog collaborated with various leading corporations to continue championing the cause of the alliance. These included MAS Holdings, Hemas Holdings PLC, Sarvodaya Shramadana Movement and PwC Sri Lanka. Other corporate partners were CBL Group, Citibank, Sunshine Holdings PLC, Huawei Technologies Lanka Co. Pvt Ltd and Unilever Sri Lanka. London Stock Exchange Group and Roar Global also contributed to the initiative, which provided emergency relief amounting to Rs. 324.5 million to over 120,000 families in need across all 25 districts of the country by October 2023.

This significant aid was made possible through the contribution of over 325 million rupees collected from corporate partners, employees, and the general public, demonstrating a concerted effort to alleviate hardships faced by vulnerable communities in the wake of the pandemic-induced economic crisis.

DRIVING GOVERNANCE & RISK



What This Means to Us

We are committed to building a culture of trust and resilience to seize new opportunities and create value for customers, shareholders and communities. We demonstrate our genuine commitment and integrity in building long-term digital trust through robust measures to enhance cyber security and data protection. Axiata's values and dedication to integrity are articulated in its Code of Conduct, serving as a unifying force that guides the commitment of each member of our workforce.

Material Matters

- ▶ **Digital Integrity - page 90**
 - Top 30% in the ASEAN region on the NIST maturity industry benchmark
 - Axiata Aggregate Cyber Security Maturity Level at 3.4/5
 - Axiata Aggregate Privacy Maturity Level at 3.0/5
- ▶ **Business Ethics & Governance - page 94**
 - Enhanced corporate governance framework under New Operating Model
 - ABAC Plan 2021–2023 completed with 100% of plans executed
 - > 90% completion Group-wide for mandatory training
- ▶ **Regulatory & Political Risk - page 100**
 - Mitigated regulatory risks and achieved positive outcomes across markets
 - Dialog renewed its core mobile license for the next 10 years
 - Robi's pricing spectrum allocation in local currency advocacy reduced almost 30% of spectrum acquisition costs
- ▶ **Sustainable Supply Chain - page 102**
 - 69% of spending on local suppliers
 - Corporate Centre enhancing risk management and ESG integration in the procurement process

Prioritised UN SDGs



DIGITAL INTEGRITY

Axiata is committed to protecting the data entrusted to us by our customers, employees and business partners. Our cyber security and data privacy strategies are built on robust governance principles, with emphasis on preventive, detective and responsive controls, and fostering a culture of responsibility throughout our business operations. We will continue striving towards Axiata’s 5.0 Vision to become The Next Generation Digital Champion.

Why Is This Important

Given the rapidly changing technological, threat landscape and regulatory ecosystem, cyber security threats have become increasingly prevalent and data privacy has emerged as a primary concern among customers of telco and digital companies. To this end, we make every effort to maintain customers’ trust in us and secure the long-term sustainability of our business.

Outlook

Key initiatives for 2024 include enhancing integration between cyber capabilities and privacy objectives, standardising Board reporting and augmenting Third Party Privacy Risk Assessments. Other initiatives involve leveraging the DevSecOps framework for Data Privacy controls, implementing privacy checkpoints in CI-CD pipelines, conducting transfer impact assessments and raising internal and external awareness on Privacy Risk Quantification.

Our Approach

Our approach to ensuring digital integrity involves proactive measures to mitigate the risks of data breaches. Apart from robust policies, we comply with regulations throughout our business operations. This includes assessing vendors’ data practices and providing comprehensive employee training on effective risk management. We expect all our stakeholders, including employees, business partners and vendors, to adhere to our data privacy and cyber security standards outlined in our Employee and Supplier Code of Conduct.

To remain updated on emerging risks and trends, we collaborate with external analysts and think tanks such as GSMA, ITU, Gartner and the World Economic Forum. We use their insights to develop actions and programmes to protect our data and ensure the Group’s long-term sustainability, adaptability and resilience.

Our approach to data privacy and cyber security is guided by the following frameworks, policies and strategies:


Data Privacy


- Axiata’s Privacy Commitment based on the T.R.U.S.T principles (Transparent, Rights, Use, Security and Transfer)
- Group Data Privacy Policy and Privacy Notices
- #ASH 3.0: 2024-2026 Roadmap

Cyber Security

- Digital Trust and Resilience (DT&R) 2023 Strategy
- Group Information Security Policy
- NIST Cyber Security Framework
- Zero Trust Principles

The Board Risk and Compliance Committee (BRCC) is responsible for overseeing cyber security risks and risks relating to data privacy, with support from the Risk and Compliance Department. To ensure execution, Board Risk and Compliance Committees of OpCos are tasked with reviewing OpCos’ performance. The Group monitors the implementation of the strategy and reports to the Group Board of Directors periodically to facilitate risk-based decisions.

 **IAR.** Board Committees on pages 97 to 98

 **GAFS.** Building Digital Trust Through Data Privacy and Cyber Security on pages 40 to 42

Our Progress

Data Privacy

In today’s evolving landscape, risks related to data, digitisation, connectivity and consumer privacy have increased due to consumer distrust, government regulations and market competition. Therefore, strengthening data privacy and security has become a top priority for organisations. As personal data protection laws have become more stringent, Axiata has adapted to these changes by fostering a progressive culture of risk, privacy and compliance.

The BRCC is responsible for overseeing data privacy and is supported by the Risk and Compliance Department. As part of our commitment to enhancing data privacy measures, each OpCo has appointed a Data Privacy Officer (DPO) or Privacy Lead.

Our Commitment

Customer Data Privacy takes centre stage in the Data Privacy and Cyber Security Roadmap, as Axiata’s new business strategy transitions from being a Digital Telco to a Digital Solutions Provider. Axiata’s Data Privacy initiatives are based on T.R.U.S.T principles and consider the legal and regulatory requirements of respective markets when conducting data privacy assessments and implementing controls to protect customer and employee data.

The Data Privacy risk landscape is assessed through internal and external key risk indicators, including external indicators sourced from reputable publications like the World Economic Forum. Axiata’s Data Privacy team engages with various sources to identify trending technologies and risks. Based on the evaluation of key risk indicators, Axiata’s Privacy Roadmap adopts a forward-looking approach to ensure proactive risk treatment plans are initiated immediately to address future risks.

Over the years, Axiata has developed a risk-based ecosystem to ensure data privacy, allowing OpCos visibility over critical data flows and processes, while adhering to regulatory standards. In 2023, the Axiata Data Privacy Team began updating the Privacy Strategy, considering technological and risk trends. Three themes were developed for 2024 to 2026: Augment, Integrate and Automate.


DIGITAL INTEGRITY

Our Strategy and Management

At Axiata, data privacy is managed through a dedicated strategy which was implemented from 2020 to 2022. This strategy encompasses various elements, including the data privacy framework, breach management process, data retention schedules, data subject rights, data privacy impact assessments, entity-level assessments and vendor privacy management framework. The data privacy organisation is led by the Data Privacy Officer, who is guided by a three-line defence model which is implemented across the Group. This model ensures the execution of controls, governance of the execution and independent validation of progress.

By the end of 2023, Axiata Group's Privacy journey showed a maturity level of 3.0 out of 5.0, with better visibility over process and data risks across business functions. This allows senior management to assess risks and validate controls more effectively. During the year, Axiata Group developed the 2024-2026 Roadmap, known as #ASH 3.0. The roadmap aims to expand the scope of implementation, integrate specialised capabilities across the Group, enhance data privacy maturity and visibility, and automate controls to achieve synergies and streamline information for better management.

ISO Certification



Obtained certification for ISO 27701:2019 Privacy Information Management System (PIMS).

In 2023, Axiata also implemented multiple initiatives and programmes to strengthen data privacy, identification management and remediation by conducting the following:

- Data Privacy Impact Assessments
- Third Party Security Assessments
- Data Privacy Maturity Assessments
- Implementation of Data Privacy control points aligned with gap assessment outcomes and the Privacy Roadmap
- Data Privacy Strategy Refresh Programme and #ASH Strategy

Furthermore, data privacy audits were conducted alongside our maturity assessment and the implementation roadmap for control gates, guided by our three-year strategy. We also have a process for Data Subject rights, which includes standardised templates for requesting access to data, correcting data and responding to these requests.

To strengthen data privacy, our OpCos followed suit by implementing their own initiatives in 2023, as shown in the following non-exhaustive list:

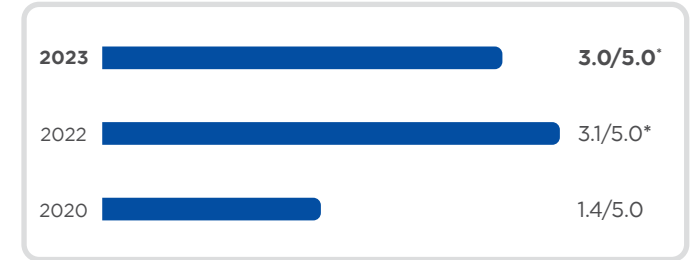
- Organised Data Privacy Awareness Week 2023
- Implemented Deployment of Data Loss Prevention (DLP)
- Achieved data privacy maturity index of 3.9

- Established a Digital Rights Policy. This policy ensures digital rights protection, transparency, privacy and freedom of expression, while complying to government mandates regarding access restrictions and data requests. It outlines the company's data collection practices, sharing data with third parties and granting users access to personal information

- Conducted training on personal data for new employees
- Provided mandatory training on data privacy modules and data privacy refresher
- Implemented Deployment of Data Loss Prevention (DLP)

During the year, we continued to measure our progress in data privacy and we implemented a maturity rating capability model across the Group. This serves as a self-assessment tool to enhance our maturity level and refine privacy controls. We plan to incorporate digital rights-related metrics into future Key Performance Indicators (KPIs) to further improve our privacy maturity levels.

Aggregate Privacy Maturity Level for Axiata Group



Notes: * The assessment for the Privacy Maturity Level is conducted internally based on self-assessment and excludes Boost, ADA, ADL and Link Net

Cyber Security

Axiata strives to build trust and confidence among stakeholders as The Next Generation Digital Champion. By aligning our vision with our shared principles, we can focus on key initiatives to establish ourselves as a trusted digital leader in the industry. This allows us to inspire trust and confidence among our peers and customers. To achieve this, we need to change how we usually approach information security. Notably, our adaptability during the pandemic has increased our resilience and awareness. We constantly face attempts to bypass our security measures and we need to reinforce our resilience through robust measures and cyber security governance.

The cyber security team within the Risk and Compliance Department oversees cyber security governance at Axiata. The team reports directly to the Group Chief Risk & Compliance Officer, with oversight from the Risk Compliance and Management Committee (RCMC) and the BRCC. Roles and responsibilities within the cyber security team are established by the Group Chief Risk & Compliance Officer (GCRCO). The RCMC and the BRCC adhere to their respective Terms of Reference (TORs), which encompass cyber security functions. The charter, policy, collective standards, guidelines and procedures for cyber security are reviewed and approved annually by the RCMC, BRCC and the Board. Additionally, we have in place a clear escalation process for employees to directly report any suspicious activity found in the system to the IT Support team.

DIGITAL INTEGRITY

Our Commitment to Enhancing Cyber Resilience

To address evolving and complex cyber threats, we continued to implement the strategies laid out in the three-year Digital Trust and Resilience (DT&R) 2023 cyber security plan. This strategy is designed to enhance our cyber resilience and manage emerging threats and risks effectively. In 2023, our DT&R was delivered through five strategic goals:



Synergy

Aligning common cyber security goals and approaches, including talent, delivery and cyber readiness across Axiata.



Risk-Based Approach

Accelerating business go-to-market efforts through informed decisions based on industry benchmarks and data points.



Crown Jewels

Protecting business-critical assets by enhancing monitoring and detection coverage beyond essential assets.



Future Fit

Embracing new ways of working by developing expertise in cloud computing, networks, APIs, DevSecOps and telco assessments.



Culture

Fostering a cyber security awareness culture within the Axiata ecosystem through the right people, awareness and employee actions.

The key strategic initiatives outlined in the DT&R 2023 were successfully implemented, resulting in tangible benefits such as reduced vulnerabilities, quicker incident response times and reduced potential losses. This has led to improved data protection and strengthened business continuity for long-term cyber resilience. We provided employees with cyber security awareness training programmes to enhance knowledge and engagement, promoting a culture of vigilance and shared responsibility. Employees were also encouraged to engage in cross-divisional collaboration, promoting integrated enterprise risk management through collective brainstorming initiatives.

Valuable partnerships were established with government agencies, allowing us to leverage expertise from both the public and private sectors to enhance our cyber defence capabilities

and acquire critical threat intelligence. In addition, the DT&R 2023 strategy prioritised resilience through a risk-based approach, incorporating frameworks such as Enterprise Risk Management, Enterprise Security Architecture, Zero Trust, Threat Management and enhancing the NIST Framework maturity. As we move towards the next three-year DT&R cyber security strategy, our emphasis shifts to optimising current capabilities while fostering synergy and efficiency through automation and innovation.

Axiata will strategically invest in AI-powered automation to bolster threat detection, incident response and security management. We will remain proactive and explore emerging technologies like AI-powered security solutions, advanced threat intelligence solutions and predictive attack tools to stay ahead of evolving threats.

ISO Certification



ISO/IEC 27001:2013 Information Security Management System (ISMS)



- ISO 20000-1:2018 Information Technology Service Management System (SMS)
- ISO 27001:2013 Information Security Management System (ISMS)



ISO 27001:2022 Information Security Management System (ISMS)



ISO 27001:2022 Information Security Management System (ISMS)

In 2023, multiple initiatives were implemented to enhance cyber security in Axiata and across our OpCos. We implemented a risk management framework aligned with ERM, ensuring business and risk owners were actively involved. Cyber and technical matters were also communicated to business leaders to enhance their understanding of risks and prioritise security investments.

Additionally, to enhance NIST maturity across OpCos, we rolled out strategic initiatives, bolstering our collective cyber resilience and reducing potential risks. We equipped the Senior Leadership Team with awareness in cyber security through a ransomware wargame, enabling informed decision-making and proactive risk mitigation.

DIGITAL INTEGRITY

Cyber Fusion Centre Receives Recognition



In August 2022, Axiata launched its Cyber Fusion Centre as part of its DT&R strategy. This centre not only enhances situational awareness in cyber security but also promotes public-private partnerships to bolster cyber resilience in the region. It offers advanced support and protection for digital data, enabling modern threat monitoring and hunting to ensure business continuity.

The cutting-edge cyber security facility was awarded the Malaysia Cybersecurity Awards 2003 Cyber Security Project of the Year and its operational standards were accredited with CREST Certification, making it a FIRST Member. Customer data privacy controls are evaluated through 24/7 monitoring of critical applications, penetration tests, vulnerability assessments, Red Team exercises, threat intelligence functions and incident management protocols.

In 2023, we hosted YB Ahmad Fahmi (Minister of Digital Communications) at the Axiata Cyber Fusion Centre, emphasising the crucial role in enhancing Malaysia's cyber security through public-private collaboration. We also conducted impactful campus visits for university students to bridge the gap between industry requirements and the academic curriculum, nurturing talent pipelines and contributing to a future-ready workforce.

In 2023, our internal audit team audited our IT infrastructure and Information Security Management systems. We also conducted third party vulnerability analysis through the Axiata Cyber Fusion Centre.

In our commitment to address threats promptly and efficiently, we accelerated response capabilities by automating processes and integrating threat intelligence tools. Red Team exercises were also organised annually, to ensure that our team is able to operate independently in real-time scenarios and identify potential vulnerabilities across all our OpCos.

- Axiata Group Cyber Security team obtained CREST accreditation, validating adherence to industry-leading cyber security standards and meeting Bank Negara's RMIT mandatory requirements
- Our Red Team members secured second place in the Cyber Nations Championship, displaying exceptional skills among participants from 24 countries, highlighting our global competitiveness and the talent of our team
- We successfully transitioned from an outsourced security operation centre model to a fully insourced model, resulting in improved control, efficiency and significant cost savings

During the year, the OpCos implemented various initiatives to enhance cyber security:



- Initiated transition to ISO 27001:2022 from ISO 27001:213 for cyber security
- Implemented Data Leakage Prevention (DLP) to protect and mitigate data breaches
- Achieved NIST overall maturity score of 3.54
- Appointed a Data Privacy Officer to oversee the implementation of controls aimed at protecting and preventing data breaches within our organisation



- Implemented Phase 1 of the Zero Trust Maturity Programme



- Implemented Data Leakage Prevention (DLP) to mitigate data security risk
- Leveraged NIST Cyber Security Framework to improve overall cyber security maturity



- Launched a Data Loss Prevention (DLP) Project to improve DLP standards and deploy DLP technology within our Office 365 system
- Established information labels and identified sensitive information, especially in Personal Identifiable Information (PII)

Improving the Maturity Level of Our Cyber Security

We are committed to collaborating, knowledge-sharing and safeguarding our most critical assets while embracing new technologies. To ensure the maturity of our security programme, we continuously monitor and enhance our controls based on the National Institute of Standards and Technology (NIST) framework. Our progress and effectiveness are evaluated using the globally recognised NIST Cyber Security Framework, which assesses five key areas: Identify, Protect, Detect, Respond and Recover. This framework serves as a comprehensive structure for our cyber security maturity programme. An independent NIST assessment is conducted every two years, while regular self-assessments are carried out to continuously enhance our security measures.

Aggregate Cyber Security Maturity Level for Axiata Group



Target

To rank among the top 25% in the ASEAN region on the NIST maturity industry benchmark by 2025

We continued to rank **in the top 30%** in 2023, exceeding the regional average of companies across Asia Pacific, Europe and Latin America.

In 2023, NIST refined the assessment criteria and updated the methodology to ensure that practices remain aligned with the evolving global threat landscape. Consequently, the adjustment led to a slight drop in our rating compared to 2022. Despite undergoing several mergers and acquisitions during the year, we maintained an overall cyber security maturity of 3.4 across the Group. This was due to our focus on enhancing maturity in specific areas of cyber security, including Zero Trust, Telco Security and Cyber Resilience.

There were no substantiated complaints concerning breaches of customer privacy or loss of data in the year under review.

BUSINESS ETHICS & GOVERNANCE

To establish ourselves as The Next Generation Digital Champion in the ASEAN and South Asia region, we focus on fostering a culture of good governance and ethical business conduct. We are committed to maintaining stringent compliance standards, preventing bribery, corruption and anti-competitive practices, while ensuring transparency in taxation, respecting human rights and upholding freedom of expression. We adhere to applicable laws and regulations across all the countries where we operate.

Why Is This Important

Upholding strict business ethics is a crucial focus at Axiata. To this end, we have implemented robust governance practices and aligned all business activities with our Code of Conduct, which follows the T.R.U.S.T principles outlined in the Malaysian Anti-Corruption Commission (MACC) Act. We believe that by nurturing a culture of ethics, we can promote transparency and trust in our relationships with stakeholders.

Outlook

We strive to conduct our business responsibly to comply with changing regulations. Our actions are guided by vigorous policies and procedures, and we remain committed to promoting ethical practices throughout our supply chain. We will continue to enhance our efforts to foster a culture of compliance and integrity within our operations to gain customers' trust and meet stakeholder interests.

Our Approach

To strengthen our position as the Next Generation Digital Champion in ASEAN and South Asia, we are committed to embedding a culture of good governance and ethical business practices. We ensure that we comply with regulatory requirements, laws and industry best practices in every country that we operate in to ensure transparency and accountability in all that we do. Our approach to business ethics encompasses the following areas:



Our efforts in business ethics are guided by the core values of the three C's under our Winning Culture: Obsession for Customers, Courage for Change and Passion for Collaboration. This is delivered through Uncompromising Integrity, Exceptional Performance (UI.EP), which is embedded in our business operations and supply chain activities.



BUSINESS ETHICS & GOVERNANCE

Our Progress

Corporate Governance Framework

The Board of Directors of Axiata Group Berhad (Board or BOD) strongly advocate and support the principles of good corporate governance. The Board has continually strived to enhance and strengthen the Group’s governance system and processes to ensure that the highest levels of corporate governance is practised Group-wide.

The Board is committed to maintaining the highest standards of good governance to promote quality decision making and the execution of those decisions within a disciplined framework of policies and procedures.

Good governance exists in an environment where roles and responsibilities are clearly defined, forums are conducive for a robust debate, and performance is regularly reviewed. We outline our progress and describe our governance efforts over the following pages. The Board provides effective leadership to the Group and embraces the principles of ethical leadership in setting and implementing the Group’s strategy.

To ensure we make and execute good decisions and direction in the interest of the Group, its shareholders and other stakeholders, the Board works continuously to maintain and develop its governance framework. The Board exercises independent judgement on all issues reserved for the Board’s review and approval while simultaneously considering the needs of all stakeholders, and take full responsibility for the management, direction and performance of the Group.

Among the key changes to our governance framework include:

Axiata Enterprise Investment Board (AEIB) Committee Expansion

In efforts to refine attention on investment activities within the Group, the Board had expanded the scope of the previously named Axiata Enterprise Investment Board Committee (AEIB) to encompass a broader range of investment activities. The AEIB was renamed as the Axiata Board Investment Committee (ABIC) effective 28 August 2023 and further mandated in line with the committee’s broader scope. At the same time, similar committees have been rolled out at PT XL Axiata Tbk, PT Link Net Tbk, Robi Axiata Limited, Dialog Axiata PLC and Smart Axiata Co., Ltd. emulating the same function as ABIC.

Sharpening Our Focus on ESG

Since the inaugural issue of our annual report in an integrated manner, in the IAR 2017 issued in 2018, matters relating to Environment, Social and Governance (ESG) remain a core focus of Axiata and command significant attention. In keeping with the growing importance of ESG, we welcome the introduction of various ESG recommended practices in MCGG 2021 as well as the Listing Requirements by introducing key performance indicators (KPIs) on ESG matters for the Group Chief Executive Officer (GCEO) and OpCo CEOs as well as designating the Group Chief Corporate Officer as the senior management member in charge of ESG matters. The Board also plans for at least a twice-yearly tabling of ESG matters at Board meetings.

Implementing the Fit & Proper (F&P) Policy

Following the introduction of a Fit & Proper Policy for Axiata (F&P Policy) in July 2022 that require assessments of fitness and probity of individuals nominated as directors and senior management of the Group before their appointment and employment as the case may be, the BNRC has monitored the implementation of the F&P Policy. The F&P Policy meets and exceeds the provisions of the Listing Requirements in its scope of application. Since its implementation, a number of appointments to the Axiata Board have had an assessment of fitness and probity conducted prior to the appointments and the policy has also been applied on the re-election of directors who are standing for re-election following mandatory rotational retirement.

Our Governance Structure



Compliance Guidelines

Main LR of Bursa Securities & Companies Act 2016	MCGG 2021	Axiata’s Corporate Governance Framework
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Notes: * Previously known as the Axiata Enterprise Investments Board Committee. The renaming and rescoping of the committee took effect from 28 August 2023
¹ Previously known as Group AI, Analytics and Digitisation Council upon consolidation of Group Analytics Council and Digitisation Expert Working Group in Q3 2023 and thereafter, renamed to its current name in March 2024
² Consolidation of Enterprise Business Expert Working Group and Group Wholesale Council in Q1 2024

BUSINESS ETHICS & GOVERNANCE

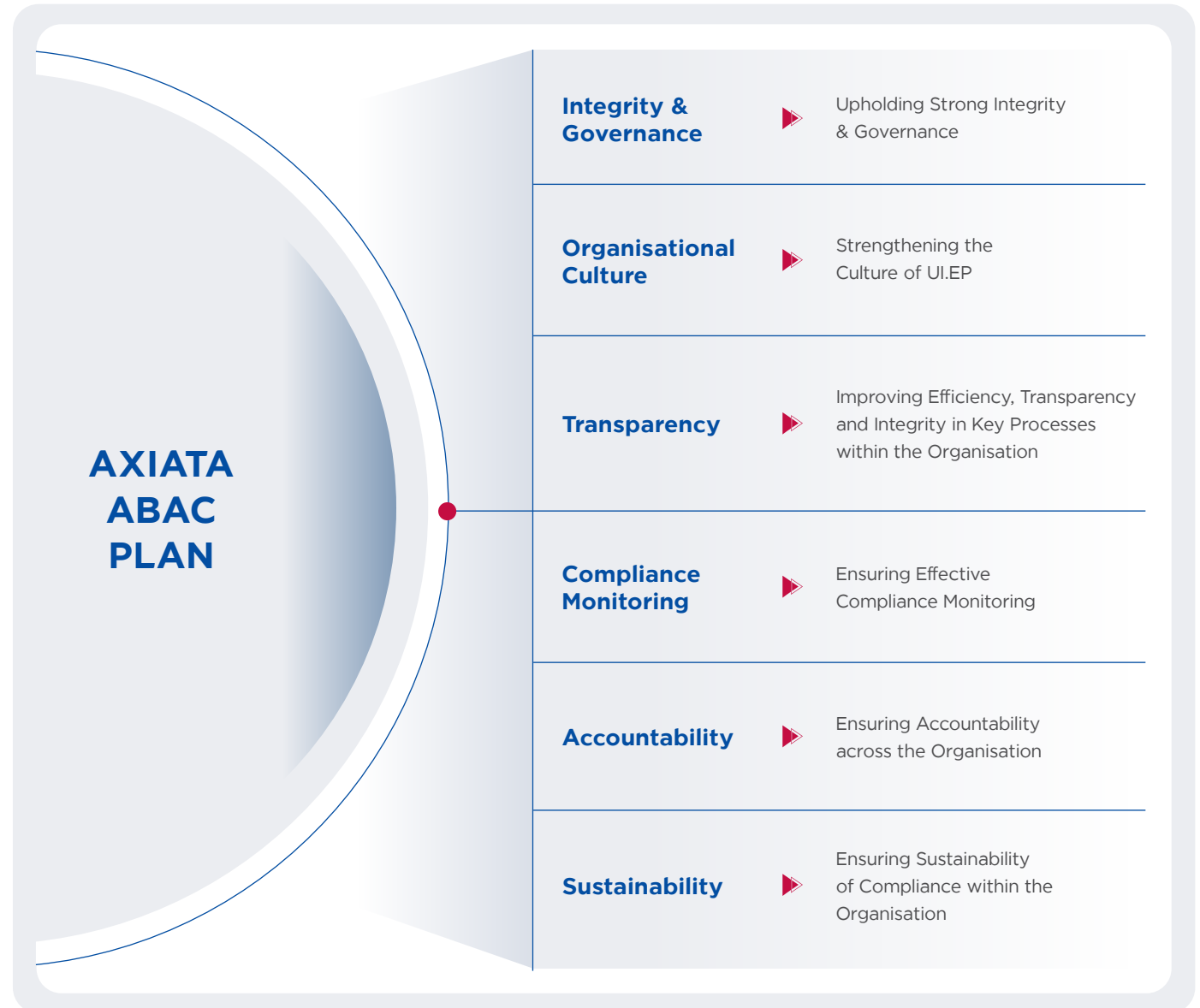
Compliance, Ethics and Integrity

Upholding strong business ethics, compliance and regulatory compliance is fundamental to ensuring shareholder protection and strengthening of stakeholder trust. It also ensures legal compliance and fosters accountability, thus strengthening our reputation and competitiveness. Our business continues to be grounded on the fundamental core values of UI.EP, which guides us in upholding ethical business practices and adherence to all governing laws and regulations in the countries in which we operate.

Embedding a Culture of Compliance

The corporate compliance programme in Axiata is premised on the Axiata Anti-Bribery and Anti-Corruption Plan (ABAC Plan). The 2021 to 2023 ABAC Plan was developed based on ISO standards, the MACC Adequate Procedure and independent maturity assessments conducted within Axiata. It is underpinned by six core principles, as indicated in the diagram on the right. In 2023, 100% of the planned activities were executed. The successful completion of the 2021 to 2023 ABAC Plan has led Axiata Group to achieve a robust maturity assessment and effectiveness testing. The new ABAC Plan for FY2024 to FY2026 is underpinned on the same six core principles with specific prioritisation on “Organisation Culture” and “Sustainability” to ensure that the culture of compliance is embedded within the organisation.

Based on the proposed evolved journey and the new ways of working, the recommendation is to maintain the existing ABAC Plan for FY2024-2026 with specific areas of focus:



First In Transparency Reporting in Sri Lanka



In its commitment to ethical conduct, transparency and anti-corruption, Dialog achieved the highest ranking in the Transparency in Corporate Reporting (TRAC) assessment for 2023. The assessment, conducted by Transparency International Sri Lanka, evaluated disclosure practices among the top 125 public limited companies in Sri Lanka.

BUSINESS ETHICS & GOVERNANCE

Adhering to Our Policies and Procedures

Axiata's operations are guided by the following policies and procedures:

Anti-Bribery and Anti-Corruption Policy and Procedures	Gifts, Donations & Sponsorships Policy and Procedures	Anti-Money Laundering Guidelines
Code of Conduct	Corporate Social Responsibility Standard Operating Procedure	Third Party Due Diligence Guidelines and Checklist
Whistleblowing Policy and Procedures	Branding, Advertising & Marketing and Sponsorship Policy and Procedures	

Our ABAC Policy covers bribes in any form, including kickbacks on any aspect of contract payments or soft dollar practices, as well as guidelines for charitable contributions and sponsorships.

Mitigating Risks Related to Corruption

Aligned with the MACC T.R.U.S.T principles, particularly relating to "Risk Assessment", we have established corruption risk registers for all core departments in Axiata to ensure that we identify activities which may pose possible risks of bribery and corruption, whereby appropriate mitigating controls are duly implemented.

Critical controls such as the establishment of Gifts, Donations, Sponsorship Committee (GDSC) across the Group, limits of authorities on gifts, donations, sponsorships, entertainment and corporate hospitality, and Third Party Due Diligence on all vendors and suppliers ensure that possible risks of bribery and corruption are duly mitigated. These risk registers are aligned with the Axiata Enterprise Risk Register and are monitored and reported to the RCMC and BRCC periodically.

Our corruption risk registers are maintained via an automated platform to ensure process efficiency, accuracy and consistency of data.

Additionally, Axiata has prioritised certain compliance processes such as the VITAL System to register the giving and receiving of gifts, donations and sponsorships and the ABAC Chatbot across the Group to assist employees with common ABAC inquiries.

Assessments Related to Bribery and Corruption

During the year, 100% of our operations were assessed for corruption-related risks.

To ascertain the compliance programme's effectiveness across the Group, we conducted an effectiveness test comprising a gap analysis of our ABAC policies and procedures, an integrity survey and an assessment of documents. An independent party conducted the integrity survey, and we achieved a 70% completion rate across the Group. The gap assessment indicated that our ABAC Policies and procedures are 99% aligned with the MACC Adequate Procedures requirements, UK Bribery Act and Foreign Corrupt Practices Act. The overall effectiveness assessment indicated that the compliance programme is strong, with low possible risks of bribery and corruption. In addition to the effectiveness testing, another review on compliance maturity was conducted, and the results show that we achieved a strong maturity level across the organisation. The identified gaps from these assessments will be addressed in the ABAC Plan for FY2024 to FY2026.

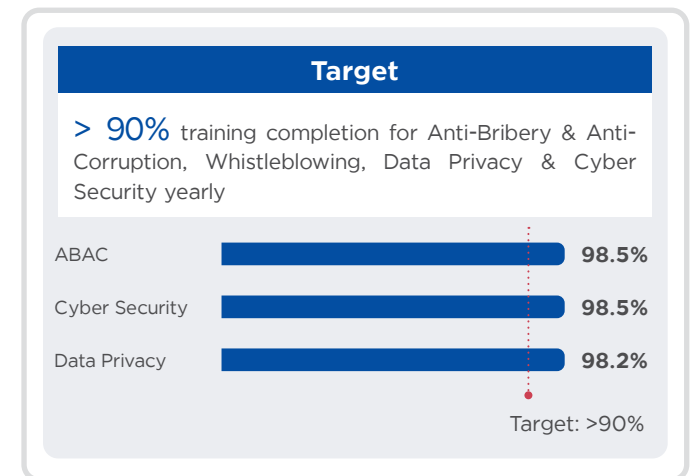
There were no confirmed incidents of corruption and actions taken in the year under review.

Anti-Bribery and Corruption Awareness and Training

To enhance awareness and understanding of our stance against corrupt practices, our Corporate Centre and OpCos implemented initiatives for employees, governing bodies and business partners. These efforts included internal and external communications, awareness training sessions, mandatory ABAC training and discussions. As part of our contribution towards strengthening ABAC awareness in the country, roundtable sessions with key telcos in Malaysia were organised in 2023, whereby knowledge sharing, best practices on ABAC, ethics and integrity were discussed. Also, we participated as speakers in various external conferences to share ABAC best practices and supplier engagement sessions in Sri Lanka and Indonesia.

Our Training Status for External Commitment

We strive to create long-term value by fostering a winning culture based on integrity, ethics and compliance, achieved through our mandatory training and awareness programme for employees and broader stakeholders:



BUSINESS ETHICS & GOVERNANCE

Speaking Up

Axiata's Code of Conduct reinforces the importance of speaking up about anything that is unlawful, unethical, or inconsistent with our Code. Everyone with a relationship with Axiata and its subsidiaries across the Group can voice and register their concerns, including anonymously, through the Axiata Group Speak Up Channel at <https://axiatagroup.integrityline.com>, which is operated by an independent external provider and overseen by Axiata Group Internal Audit. We maintain a strict no-retaliation policy to protect any person raising concerns in good faith.

All reports received through the Speak Up Channel are thoroughly reviewed and responded to, including conducting investigations where appropriate. Substantiated reports would be subjected to a disciplinary process and actions meted out where appropriate, which may include dismissal.

 Speaking Up Policy and Procedures available [here](#)

Anti-Competitive Behaviour


Competition compliance is a crucial aspect of maintaining ethical business practices, which all stakeholders must adhere to. As outlined in the Axiata Supplier Code of Conduct, our suppliers and vendors are forbidden from engaging in anti-competitive behaviour. We do not have a specific policy and procedure for anti-competitive behaviour. However, our Supplier Code of Conduct prohibits suppliers and vendors from engaging in anti-competitive behaviour.

Additionally, the Employee Code of Conduct mandates all employees to comply with applicable competition laws and refrain from participating in any activities that may violate these laws (refer to Article 3.7 of the COC).

Risk Management

Axiata's Enterprise Risk Management (ERM) policy and framework outlines the Group's approach to managing risks. It demonstrates the Group's dedication to assessing risks in line with business goals, integrating risk management into decision-making, anticipating potential risks amid internal and external changes and ensuring transparent communication through monitoring and reporting structures.

Axiata has embraced a risk management strategy aligned with ISO 31000:2018, which has been adapted according to the Group's business operations.

 **IAR**, Our Risks Linked to Strategy on pages 29 to 34

 **GAFS**, Statement on Risk Management and Internal Control on pages 28 to 36

Human Rights

The value chains of mobile operations involve human rights risks due to the nature of the operations. These risks encompass various issues, such as the treatment and working conditions of workers across the supply chain, the treatment of employees within the company and the protection of customers' rights on the Internet.

In our commitment to upholding human rights across our operations, we have implemented the following efforts:

- **Upholding Human Rights**

Axiata is committed to respecting all its employees and stakeholders' human rights and complying with local laws. In November 2022, we joined the UN Global Compact, integrating the Ten Principles into our business operations and culture. This underscores our commitment to upholding human rights, protecting the environmental, and combatting corruption.

 **SNCR**, UNGC Principles Index on page 137

- **Business Ethics and Governance**

We strictly adhere to the highest standards of business ethics and comply with applicable laws, regulations and policies across our markets. This encompasses anti-corruption measures, tax transparency, fair competition and human rights, supported by robust corporate governance.

 **SNCR**, More information within this chapter

- **Fair, Diverse and Inclusive Workplace**

Axiata's Employee Code of Conduct sets standards for our employees and interactions with our direct stakeholders within our supply chain, emphasising universal human rights and International Labour Organization (ILO) core labour standards. We are steadfast in our commitment to providing a safe and supportive work environment that prioritises employee wellbeing. This involves protecting our employees from any discrimination, harassment and/or retaliation. Other areas covered include but is not limited to ensuring there is no forced labour, child labour, fair remuneration, freedom of association/collective bargaining, or unsafe work conditions.

For the year in review, no report concerning human rights across the Group was received via the Speak Up channel or other channels.

 **SNCR**, Fair, Diverse and Inclusive Workplace on pages 67 to 70, and Employee Health, Safety & Wellbeing on pages 75 to 77

- **Supply Chain**

Our suppliers and vendors are guided by Axiata's Supplier Code of Conduct. Axiata's Supplier Code of Conduct mandates compliance with relevant local labour laws and regulations, and international labour rights and principles outlined by the ILO in the 1998 Declaration on Fundamental Principles and Rights at Work. It covers expectations regarding no forced labour, child labour avoidance, non-discrimination, respect and dignity, wages and benefits, working hours, health and safety, environmental protection, data privacy, cyber security and other relevant matters.

 **SNCR**, Sustainable Supply Chain on pages 102 to 103

- **Right to Privacy and Freedom of Expression**

Axiata Group is committed to protecting the privacy and data of our data subjects with utmost care and respect. This is enforced by our Data Privacy Policy, which outlines the mandatory requirements to protect personal data based on the T.R.U.S.T principles (Transparent, Rights, Use, Security, and Transfer) and applicable laws and regulations in our markets. To ensure compliance with the principles and regulations, Data Privacy offices are established at all operating companies. The maturity of privacy practices adopted is measured through a framework aligned with global best practices, and strategic oversight is maintained by the Board Risk and Compliance Committee.

 **SNCR**, Digital Integrity on pages 90 to 93

- **Child Rights and Safety Online**

Mobile operators are crucial in educating children and their guardians about online risks and enabling a safer online ecosystem. At Axiata, our OpCos rolled out initiatives and raised awareness to showcase measures to safeguard users from potential harm, including Child Sexual Abuse Material (CSAM), cyberbullying and other online risks. We are progressively implementing measures across our OpCos to block CSAM by collaborating with the Internet Watch Foundation.

 **SNCR**, Digital Inclusion on pages 39 to 48

Way Forward

We will take several key steps to strengthen our human rights stance, including ensuring our business and direct stakeholders operate with respect to human rights. This includes enhancing our processes and prioritising awareness and training programmes.

BUSINESS ETHICS & GOVERNANCE

Tax Transparency

Axiata contributes both direct and indirect taxes, along with fees, to the economies, nation-building efforts and the socio-economic development of all the countries where we operate. Tax transparency is crucial for ensuring regulatory compliance, maintaining trust among stakeholders, investors and customers, mitigating legal and reputational risks and contributing to sustainable development.

Approach to Tax

Our taxation approach is guided by Axiata Group Policies – Taxation Chapter, which sets out policies for Axiata and OpCos’ tax affairs to ensure compliance with tax laws, regulations and effective tax management. Decision-making thresholds are guided by the Group’s and OpCos’ Limit of Authority.

Axiata is committed to operating our businesses in compliance with the tax laws of the countries where we operate in, contributing responsibly our fair share of taxes to society and meeting shareholder obligations.

Tax Governance, Control and Risk Management

The critical aspects of corporate governance are to ensure compliance with tax laws and mitigate risks. Therefore, effective tax governance involves establishing clear policies, procedures and oversight to manage tax-related activities. This includes assigning responsibilities to various personnel within Axiata to enhance transparency, build trust with stakeholders and drive sustainability.

At Axiata, the Group Chief Financial Officer (CFO) is responsible for Group tax compliance matters. Additionally, the Group Tax Department monitors and coordinates on tax matters of Axiata and its OpCos. Similarly, OpCo CFOs are responsible for ensuring compliance with tax law and obligations within their respective OpCos. All OpCos have either designated personnel or a Taxation department to handle respective country’s tax matters.

In tax management, the OpCo Tax function or the designated tax personnel undertake tax risk assessment to manage tax risk exposures for the legal entity. The tax risk assessment and tax management shall be approved by the OpCo CFO and is communicated to the Group Tax Department.

The Group Tax Department assesses aggregated tax risk based on information received from OpCos to determine and report on overall tax position for Axiata Group based on information received from OpCos. The Audit Committee of the Board deliberates and approves Axiata’s financial reporting, including the review of tax matters material to the financial statements. This role is also carried out by the respective OpCo Audit Committee of the OpCo Board.

In addition, the BSC oversees matters relating to the Integrated Annual Report (IAR) and National Contributions Report (NCR) suite preparation at Axiata Group level, including endorsing the tax disclosures in Axiata Group’s IAR and NCR suite.

[IAR](#), Board Accountability on pages 94 to 95.

Tax Reporting

The Group discloses its yearly taxes and fee contributions by country and by OpCo in our National Contribution Report. Additionally, our Group Audited Financial Statements report taxes paid to the Government. In the year under review, Axiata contributed USD1.3 billion in direct and indirect taxes and fees to the governments of all the countries we operate in.

[SNCR](#), National Contribution Report on pages 105 to 125

Approach to Engagement with Tax Authorities

Axiata and its OpCos adhere to strict ethical standards when engaging with tax authorities. We refrain from engaging in inaccurate or evasive practices. If tax laws are unclear, we seek professional tax advice. In addition, we actively participate in tax consultations that are relevant to our business or industry to ensure that our perspectives are heard, which may ultimately influence future outcomes.

REGULATORY & POLITICAL RISK

Axiata Group continues to navigate the complex and dynamic landscapes of the telecommunications, digital, and fintech industries. These sectors are characterised by rapid technological advancements and are subject to significant regulatory scrutiny. The balance between innovation and regulatory compliance remains a critical focus for Axiata, as it operates in the highly regulated markets of Southeast Asia and South Asia. Axiata maintains a zero tolerance level on Legal and Regulatory non-compliance as per Axiata’s Regulatory Compliance Framework (ARCF). The Company’s proactive engagement with regulators and governments underscores its commitment to ensuring sustainable business growth and meeting regulatory obligations and compliance.

Why Is This Important

The significance of regulatory and political risk management for Axiata cannot be overstated. Stakeholder interests are paramount, necessitating a vigilant approach to monitoring regulatory changes and political dynamics. This ensures Axiata’s long-term business viability and compliance with diverse and evolving regulatory requirements across its operational footprint. The Group’s strategic relationships with policymakers and regulatory bodies are essential in maintaining high compliance levels and influencing regulatory outcomes favourable to the industry.

Outlook

The economic landscape, marked by high interest rates and the weakening of local currencies against the USD, has influenced regulatory and fiscal policies. This scenario has increased taxes, including sector-specific levies like the Social Security Contribution Levy (SSCL) in Sri Lanka, affecting our operations. Despite these challenges, Axiata’s focus on managing government relations and advocating for beneficial policies through regulatory consultations has been pivotal. Our efforts towards timely and affordable spectrum releases for 4G and 5G services underscore our commitment to advancing connectivity and digital inclusion.

Our Approach

Axiata’s strategy in managing regulatory and political risks involves a proactive and engaged approach. By closely monitoring external factors that could impact the regulatory environment, Axiata aims to mitigate risks through engagement with policymakers, regulatory stakeholders, and industry peers. This collaborative approach seeks to address common issues and advocate for policies that support the telecom sector’s growth and innovation.

Our Progress

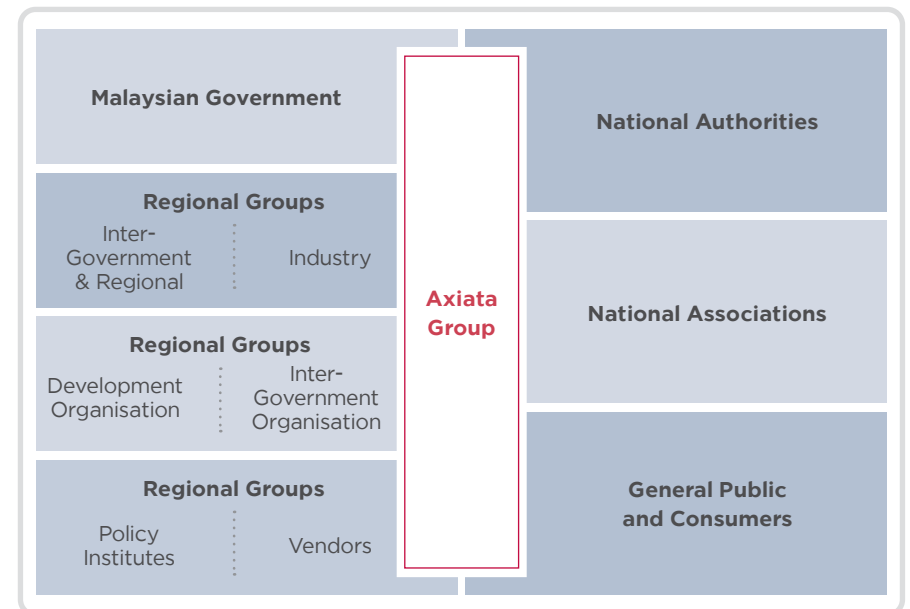
In 2023, Axiata faced heightened regulatory scrutiny across its operations, marked by an increase in regulatory fees and stricter quality of service regulations. The evolving landscape of telecom laws demanded a vigilant approach to regulatory management. Axiata’s response, guided by the Axiata Regulatory Compliance Framework (ARCF), was designed to ensure that the company not only meets compliance expectations but also minimises exposure to regulatory risks and remains agile in the face of regulatory changes. This framework underscores Axiata’s commitment to navigating the complex regulatory environments of its markets, ensuring the company’s operations align with the latest legal standards and contribute to its strategic objectives.

Regulatory risks in 2023 included:

- Spectrum availability
- Licence rights curtailment
- Higher regulatory fees, charges and taxation
- Stringent Quality of Service (QoS) regulations
- Compliance with rules related to SIM registration and value-added services, where relevant
- Changes to telecom laws and regulations

Stakeholder Engagement Mode

Axiata employs a strategic model to engage with regulators, policymakers, and industry players, aiming to foster collaborative discussions around regulatory challenges and opportunities.



REGULATORY & POLITICAL RISK

Regulatory Experts Working Group

Axiata has established a working group of regulatory experts across its markets, focusing on sharing insights and best practices and developing a unified stance on key regulatory issues affecting the telecom sector. This Expert Working Group convened six times in 2023 to discuss a range of topics critical to navigating the regulatory landscape, including QoS management, Over-The-Top (OTT) Network Contributions, Artificial Intelligence (AI) regulations, Data Protection legislation, and the role of CEOs in Regulatory Management.

Leveraging these insights and our regulatory strategy, we have obtained several positive outcomes in 2023, such as:

> USD200 million was preserved by the continuation of **Robi's** "Airtel" brand, ensuring a strong market presence

Robi's advocacy on pricing of spectrum allocations in local currency has reduced almost **30%** in spectrum acquisition costs

Smart successfully mitigated regulatory risks

Dialog successfully renewed its core mobile license for the next **10 years**

Dialog mitigated the effects of the new **SSCL**, effectively avoiding the negative impact of **~3%** of revenues effectively

XL's joint advocacy with the industry on spectrum costs has led to savings in microwave band fees

De-escalated proposed stringent network **QoS** rules in several markets, avoiding unwarranted **capex** commitments

Advocated measured and careful **increases** in retail tariffs to enable market repair in several markets

Participation in Forums

Axiata's commitment to leading in regulatory strategy and stakeholder engagement is evidenced by its active participation in various forums and workshops, such as the South Asian Telecommunication Regulators' Council (SATRC) Workshop on Spectrum Policy, the GSMA Mobile World Congress Ministerial Programme and others. These engagements reflect Axiata's role in advocating for global best practices in spectrum management, regulatory costs, promoting fair policymaking, and addressing the long-term sustainability of the sector and creating a fair playing field.

Mobile Communications and Health

In Mobile Communications and Health, Axiata remains sensitive to community health and safety concerns regarding antennas and mobile phone usage. With the transition towards 5G, the electromagnetic field (EMF) emissions issue has been thoroughly addressed. The International Commission on Non-Ionising Radiation Protection (ICNIRP) and the World Health Organization (WHO) have set standards to ensure safe exposure levels, which Axiata and its OpCos strictly adhere to.

Notably, the ICNIRP's 20-year research, published in its latest guidelines in 2020, concludes that the frequencies used for 5G mobile networks pose no health risks to humans. This finding aligns with Axiata's commitment to upholding the highest health and safety standards, ensuring that its services and infrastructure do not harm users. The Group's compliance with established science-based standards demonstrates its dedication to promoting digital inclusion while addressing any health-related concerns associated with mobile technology.

Political Risks

Axiata continues to navigate through geopolitical challenges, including Sri Lanka's ongoing recovery from its worst economic crisis in its history, rising interest rates, the ongoing situation in Myanmar, and others.

These situations have necessitated comprehensive assessments and due diligence, particularly regarding sanctions impacting vendors, suppliers, and partners. Rigorous checks against international sanction lists ensure compliance and minimal operational disruption.

General Elections scheduled in 2023 and 2024 across Southeast Asia and South Asia mean potential changes to governments and government policies. Axiata maintains a neutral political stance, fostering positive relations with the government of the day and contributing to the nation's socio-economic development through CSR initiatives across our markets. This approach has enhanced our ability to better monitor and anticipate geopolitical risks, leveraging local expertise and knowledge to navigate the fluid political landscapes. Our commitment to resilience is underpinned by robust Business Continuity Plans (BCP) across all OpCos, ready to be activated in crisis situations, ensuring continuity amidst political and social tensions.

SUSTAINABLE SUPPLY CHAIN

A key part of Axiata’s success and growth lies in its extensive network of suppliers and vendors. Our network of suppliers spans across nine countries in both the ASEAN region and South Asia, providing digital and mobile telecommunication services. With over 4,000 suppliers, we can create positive change for the communities in which we operate, impacting environmental, social and governance aspects.

Why Is This Important

At Axiata, it is essential to maintain the quality of our services and foster innovation to meet our customers' evolving needs. To this end, our suppliers are expected to maintain the highest standards of business conduct and integrate sustainability practices into their operations. A sustainable supply chain is important to our stakeholders and as such, we strive to provide support to our supply chain partners, enhancing their ability to manage EESG factors within their business operations.

Outlook

Operational risks and supply chain disruptions can lead to adverse impacts on Axiata’s core business and operations. To address these risks, our supply chain strategy includes partnering with established suppliers to leverage their scale. This involves collaborating with top regional suppliers and relying on deliveries from various Asian locations that are more stable and are less vulnerable to geopolitical risks.

Our Approach

Our suppliers are instrumental in helping us meet customer demands and ensuring that our operations run smoothly. Axiata’s supply chain encompasses diverse categories, ranging from equipment and infrastructure vendors to connecting society to IT service providers who drive our operations forward. We value the contributions of all our suppliers and vendors, and we remain committed to actively collaborating with them to meet their needs. Our aim is to cultivate meaningful and enduring relationships with our suppliers to ensure undisrupted supply chains, particularly during challenging times.

Our procurement activities are guided by the following policies and processes:

Group Procurement Policy

Third Party Due Diligence Operating Guideline

Group Limits of Authority (LoA)

Guideline on Managing High Risk Transaction (HRT) in Procurement Process for Axiata Group & SOP for Corporate Centre Operations

Our supply chain management also focuses on:

- **Strengthening Supply Chain Management**

Enhancing purchasing, management of risks, evaluating vendors’ performance and developing new business relationships

- **Ensuring Suppliers’ Compliance to Policies and Procedures**

Our suppliers are expected to adhere to our Supplier Code of Conduct (SCOC) and other policies such as the Whistleblowing Policy

Axiata Supplier Code of Conduct

All of our suppliers are required to adhere to the minimum principles and standards outlined in the SCOC. They are also encouraged to surpass these requirements whenever possible.

Axiata’s suppliers are required to comply with the following:

Axiata Supplier Code of Conduct

Business Practices

- Laws, including Regulations and Other Legal Requirements
- Policy on Bribery and Corruption
- Position on Conflict of Interest
- Anti-Competitive Conduct
- Dealing with Public or Government Officials and Politically Exposed Persons (PEP)

Health & Safety

Environment

Data Privacy & Cyber Security

Anti-Money Laundering

Labour Rights & Working Conditions

- Forced or Involuntary Labour
- Preventing Child Labour
- Wages and Benefits
- Working Hours
- Respect and Dignity
- Non-Discrimination
- Freedom of Association

We are committed to ensuring that our suppliers fully comply with these principles. Exceptions are only allowed in special circumstances with the approval of Compliance. These principles guide us in our selection of suppliers, ensuring that we actively monitor suppliers’ compliance.

Axiata’s SCOC is available on our corporate website, with regular updates communicated to our suppliers. We have mitigation measures in place for non-compliant suppliers who do not adhere to the SCOC, and this includes remedial measures to assist them in meeting compliance requirements. Going forward, we will continue to uphold the SCOC, while also supporting our suppliers in enhancing their performance and surpassing the outlined standards.

Our Progress

Supplier Screening

Supplier screenings are conducted on vendors and suppliers during the onboarding process. At the Corporate Centre, for instance, suppliers are screened using an independent screening system. Any breaches related to business ethics, environmental issues or social governance concerns are identified and reviewed. Suppliers are encouraged to implement their own environmental policies to manage and mitigate environmental impacts.

SUSTAINABLE SUPPLY CHAIN

Supplier Assessment

As we strive to build sustainable partnerships and achieve better business outcomes, it is crucial to evaluate our suppliers. This ensures that they align with our practices and standards, helping us to identify gaps and improve overall supply chain performance. Supplier assessments facilitate the identification of potential risks, including suppliers' financial stability, operational capabilities and regulatory compliance, minimising disruptions in our supply chain. Moreover, assessments allow us to monitor their performance, ensuring compliance with quality standards and consistent product quality.

The integration of ESG criteria into our supplier assessment has been incorporated at the Corporate Centre and is one of the methods used to achieve the above objective. Our evaluation encompasses aspects such as environmental and safety standards, carbon emissions, human rights and social impacts.

Additionally, supplier assessment helps to optimise costs, preventing unnecessary expenses from delays or legal issues. Improving supplier performance enhances efficiency and inventory management, accelerates production and boosts customer satisfaction. Regular assessments also promote better communication and collaboration with suppliers as we work towards common goals.

Grievance Mechanism

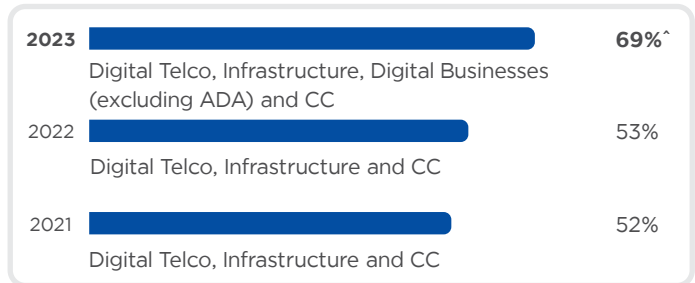
At Axiata, we provide avenues for suppliers to report concerns related to violations of the SCOC, illegal or unethical behaviour or any suspected wrongdoing. One such platform is the Speak Up channel, which is accessible to all suppliers. We also have in place a Whistleblowing Policy and procedures, enabling whistleblowing reports to be submitted without fear of reprisal. We remain committed to protecting individuals who submit reports or raise concerns in good faith, and those involved in or conduct investigations.

Supporting Local Suppliers

We work with a wide range of suppliers, spanning different categories and sizes. As part of our commitment to supporting local economies and building a diverse supplier base, we closely monitor the proportion of our suppliers that are local and the percentage of our spending allocated to local suppliers across our various OpCo markets. It is important to note that the definition of suppliers at Axiata varies by country depending on the local regulations where the OpCo operates.

Our partnerships with local suppliers offer flexibility and influence over our supply chain. This enables us to mitigate supply chain risks and better manage our operational footprint. Additionally, our support for local suppliers contributes to socio-economic growth by creating job opportunities in the communities where we operate.

Proportion of Spending on Local Suppliers



Notes: ¹ Total value of invoices for purchase of goods or services during the reporting period
² Local suppliers refer to companies or persons that provide products or services to the reporting company, and that are based in the same geographic market as the reporting company (that is, no transnational payments are made to a local supplier)
³ The geographic definition of 'local' can include the community surrounding operations, a region within a country or a country
⁴ This data was subjected to external independent limited assurance. Refer to the independent limited assurance report on pages 138 to 139

Supplier Engagement and Capacity Building

Axiata partners with suppliers to improve product and service delivery, while strengthening its ESG performance and enhancing supplier capabilities. In 2023, we continued to work closely with suppliers, implementing initiatives aimed at enhancing operational excellence, procurement practices, compliance and integrity. These initiatives are vital for guiding supplier activities and transactions, ensuring that our organisation operates in a fair and transparent manner and practises responsible business ethics. Below is a list of selected engagement activities organised for our suppliers among OpCos:



- Engaged over 200 suppliers in a Supplier Forum themed "Elevating Governance for Stronger Sustainability"



- Provided ABAC awareness sessions for EDOTCO's top 20 suppliers in Bangladesh
- Engaged suppliers on sustainability-related matters



- Enhanced awareness on Value-Based Business Relationship
- Conducted awareness sessions on ethical business practices, ABAC, SCOC and third party due diligence



- Facilitated knowledge-sharing sessions on sustainability trends and Axiata's expectations
- Conducted an eco-friendly catering event to certify caterers with sustainable practices

Corporate Centre: Enhancing Risk Management and ESG Integration



In line with the new approach to work, Corporate Centre Procurement will transition to a "Centralised Control and Localised Execution" model. We anticipate that this shift will enhance efficiency, agility and responsiveness in meeting the Corporate Centre business requirements.

In 2023, the Corporate Centre rolled out the Guideline on Managing High Risk Transactions (HRT) in the Procurement Process for Axiata Group and Standard Operating Procedure (SOP) for Corporate Centre Operations. The target of this SOP was to review ABAC HRT Procurement procedures/Key Controls designed to fulfil the requirements of Adequate Procedures (T.R.U.S.T.) in managing procurement process.

The Corporate Centre also incorporated ESG elements as part of the technical evaluation during the Request for Proposal (RFP) stage, specifically for empanelled vendors. Since its implementation, seven RFP projects have undergone these evaluations, with an approximate forecasted expenditure of RM3.7 million. Going forward, plans are underway to include ESG evaluation in the early stages of vendor onboarding process, which is expected to be rolled out in 2024.

NATIONAL CONTRIBUTION REPORT



- ▶ Overview - page 105
- ▶ Malaysia Digital Ecosystem - page 106
- ▶ Malaysia - CelcomDigi: Key Associate Company - page 109
- ▶ Indonesia - page 110
- ▶ Sri Lanka - page 113
- ▶ Bangladesh - page 116
- ▶ Cambodia - page 116
- ▶ EDOTCO - page 122
- ▶ NCR Methodology - page 125

NATIONAL CONTRIBUTION REPORT

Overview

The 2023 National Contribution Report (NCR 2023) should be read in tandem with Axiata’s Integrated Annual Report, Governance & Audited Financial Statements, and the Sustainability & National Contribution Report to understand the context in which we operate and our holistic value creation initiatives.

Long-term Good Corporate Citizen

Our national contributions represented by the long-term value that we have created through our investments in the local telecommunications industry, network infrastructure, talent development, environmental conservation and in society.

USD8.7 billion	Employed more than 10,600 employees across Asia	Total capex + opex investment USD4.8 billion	Supported around 0.6 million jobs across Asia	Total taxes and fees paid to government USD1.3 billion
Total GDP contribution				

National contribution figures include: (i) 6 OpCos [XL, Link Net, Dialog, Robi, Smart, EDOTCO (excluding EDOTCO Myanmar)]. (ii) Axiata’s operations in Malaysia for 7 entities as part of Malaysia’s Digital Ecosystem (ADA Malaysia, Axiata Digital Labs Malaysia, Boost Malaysia, EDOTCO Malaysia, Axiata Group Berhad, Axiata Foundation, Axiata Enterprise) (iii) CelcomDigi, which is a material Key Associate of Axiata, proportioned to Axiata’s share of CelcomDigi which is 33.1%

Achievements Across The Group In 2023

Malaysia Digital Ecosystem Investments¹ in 2023 ~16,516 jobs supported ~0.1% of Malaysia GDP in terms of GVA contribution USD568 million	Malaysia - CelcomDigi (Key Associate Company)² Investments¹ in 2023 ~28,822 jobs supported ~0.3% of Malaysia GDP in terms of GVA contribution 35 years USD631 million
Indonesia Investments¹ in 2023 ~267,723 jobs supported ~0.3% of Indonesia GDP in terms of GVA contribution 18 years USD1,858 million	Cambodia Investments¹ in 2023 ~48,493 jobs supported ~1.4% of Cambodia GDP in terms of GVA contribution 25 years USD251 million
Bangladesh Investments¹ in 2023 ~109,176 jobs supported ~0.4% of Bangladesh GDP in terms of GVA contribution 28 years USD674 million	EDOTCO Investments¹ in 2023 ~61,454 jobs supported 11 years USD332 million
Sri Lanka Investments¹ in 2023 ~65,493 jobs supported ~0.9% of Sri Lanka GDP in terms of GVA contribution 28 years USD461 million	Supporting around 0.6 million³ Job Opportunities across Asia

Notes: ¹ Investment in the forms of capital expenditure and operating expenditure □ Years of Investment
² Contributions from CelcomDigi as a key associate are proportioned to Axiata’s share of the entity which is 33.1%
³ Including jobs supported by CelcomDigi as a material key associate
⁴ Financials presented in this Report are based on data provided by the Group Controller numbers and not the financial statements of subsidiaries
 Source: KPMG analysis

Report Structure

This Report consists of economic impact assessment of six OpCos, including:

- Smart (Cambodia)
- XL including Link Net (Indonesia)
- Dialog (Sri Lanka)
- Robi (Bangladesh)
- EDOTCO (Bangladesh, Cambodia, Laos, Pakistan, Philippines, Sri Lanka and Indonesia)

The Report also includes a chapter with the economic impact assessment of Axiata’s digital ecosystem and group operations in Malaysia. Subsidiaries included in this analysis are:

- ADA Malaysia
- Axiata Digital Labs Malaysia
- Boost Malaysia
- EDOTCO (Malaysia)
- Axiata Group Berhad (Corporate Centre)
- Axiata Foundation
- Axiata Enterprise

The Report also consists of an overview of CelcomDigi’s contributions to the Malaysian economy in 2023, as it is a material Key Associate Company of Axiata Group.

For this Report, a refreshed set of analysis will be conducted for 2019-2023, with the latest available data being provided as inputs. This may result in discrepancies compared to previous NCRs.

For each section, the Report presents the economic and financial assessments of Axiata Group and its subsidiaries’ contributions to national economies



NATIONAL CONTRIBUTION REPORT

Malaysia Digital Ecosystem

Beyond telecommunications, Axiata has built an extensive portfolio of digital businesses, supported by activities at Group headquarters. This digital ecosystem has an extensive footprint in Malaysia, contributing to Malaysia's economy and growth, which will be presented in this section of the Report. Companies included as part of this analysis are:

- Axiata Group Berhad (Corporate Centre)
- Axiata Foundation
- ADA Malaysia
- EDOTCO (Malaysia)
- Boost Malaysia
- Axiata Digital Labs Malaysia
- Axiata Enterprise

As a digital company, Axiata recognises the need for cyber security and resilience, investing heavily in their capabilities to control and manage digital risks.

Axiata Cyber Fusion Centre

In August 2022, Axiata launched its Cyber Fusion Centre as part of its Digital Trust & Resilience strategy. This centre not only enhances situational awareness in cyber security but also promotes public-private partnerships to bolster cyber resilience in the region. It offers advanced support and protection for digital data, enabling modern threat monitoring and hunting to ensure business continuity.

- The cutting-edge cyber security facility was awarded the Malaysia Cybersecurity Awards 2023 "Cyber Security Project of the Year", and its operational standards were accredited with CREST Certification, making it a FIRST Member
- Customer data privacy controls are evaluated through 24/7 monitoring of critical applications, penetration tests, vulnerability assessments, Red team exercises, threat intelligence functions and incident management protocols
- In 2023, Axiata hosted YB Ahmad Fahmi (Minister of Digital Communications) at the Axiata Cyber Fusion Centre, emphasising the crucial role in enhancing Malaysia's cyber security through public-private collaboration

Contribution to Gross Value Added (GVA)

USD500 million
(0.1% of the Nation's GDP)

Operational Direct GVA
USD192 million

Operational Indirect and Induced GVA:
USD242 million

Capital Investment GVA
USD66 million

- Axiata's total Gross Value Added (GVA) contribution to the Malaysia economy reached **USD500 million**, accounting for **0.1%** of the national GDP in 2023
- Axiata's operations directly and indirectly contributed **USD434 million**, accounting for **87%** of total contribution
- A further **USD66 million** GVA was generated by Axiata's capital investment, accounting for **13%** of total contribution

Direct Employees 2,437

Female **44.6%** | Malaysians **92.4%**

- **2,437 staff** were directly employed by Axiata in 2023
- Around **44.6% of total employees** were women, higher than the national level recorded at 39%²
- Malaysian citizens accounted for **92.4% of total employees**

Total Jobs Supported 16,516

Directly Employed **2,437** | Operational Indirectly Supported **9,972** | Supported by Capital Investment **4,107**

- Overall, Axiata supported **16,516 jobs** in 2023 through its operations and capital investments
- Axiata's operations directly and indirectly supported **12,409 jobs**, accounting for 75% of total employment contribution
- A further **4,107 jobs** were supported by Axiata's capital investments

Capital + Operational Expenditure USD568 million

Capital Expenditure **USD101 million** | Operational Expenditure **USD467 million** | Every **USD1** Spent on capex Translated to **USD5.0** GVA Contribution⁴

- Axiata's total Capital and Operational Expenditure reached **USD568 million** in 2023, with Capital Expenditure recorded at USD101 million (18%) and Operational Expenditure at USD467 million (82%)
- Axiata added **USD5.0 GVA** to the Malaysian economy in 2023 for every USD1 spent through its capital investment.

Contribution to Public Finance USD54 million

(**0.08%** of total tax revenue of the government)

- Axiata contributed **USD54 million** in total taxes and fees paid, accounting for **0.08%** of total tax revenue of the Malaysian federal government⁵

Notes: ¹ Totals may not add up due to rounding
² Source: Malaysia Labour Force Survey Report (December 2023), Department of Statistics Malaysia
³ For companies analysed in this section, only their financials from operations in Malaysia are taken into account
⁴ Including GDP contribution from productivity impact
⁵ Total tax revenue for the government in 2023 was estimated at RM303,200 million (Source: Ministry of Finance, Malaysia)

NATIONAL CONTRIBUTION REPORT

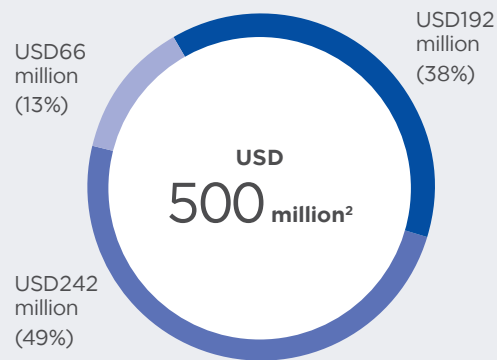
Digital Businesses and Group Operations' Total Economic Contribution to the Malaysian Economy

Axiata's operations and investments in Malaysia continued to contribute USD500 million to Malaysia's GDP in 2023. **With a total operating expenditure of USD467 million and capital investment of USD101 million**, the total Gross Value Added (GVA) contribution to Malaysia's economy was estimated at **USD500 million** in 2023, accounting for **0.1% of national GDP**.

Axiata's Malaysia operations **directly contributed USD192 million**, accounting for **38% of total GVA** contribution. It also **indirectly contributed USD242 million** through the inputs it purchased from local suppliers. This indicates that **for every USD1 Axiata directly added to Malaysia's economy, it generated another USD1.3 indirectly** through purchasing goods and services from Malaysian suppliers, **which is around the general industry average of USD0.9**.

USD66 million GVA was generated by capital investment in Malaysia, accounting for **13%** of total contribution. (Figure 1)

Figure 1: GVA Contribution to the Malaysian economy 2023



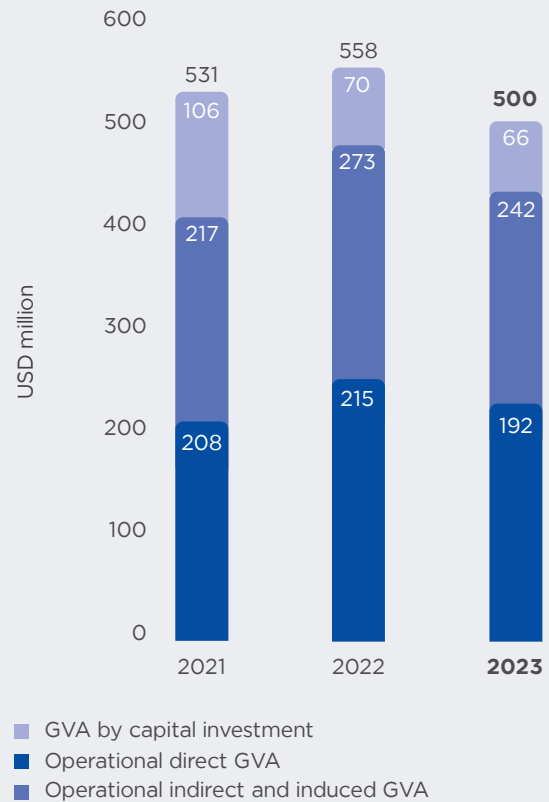
- GVA by capital investment
- Operational direct GVA
- Operational indirect and induced GVA

Notes: ¹ Totals may not add up due to rounding
Source: KPMG analysis

Digital Businesses and Group Operations' Total Economic Contribution Over the Last Three Years¹

Axiata's total GVA contribution in Malaysia **decreased from USD531 million in 2021 to USD500 million in 2023**, with a consistent share of the country's GDP at around 0.1%. Over the last three years, **total operating profits decreased by a CAGR of 17.4%**. (Figure 2)

Figure 2: GVA Contribution to the Malaysian economy 2021-2023

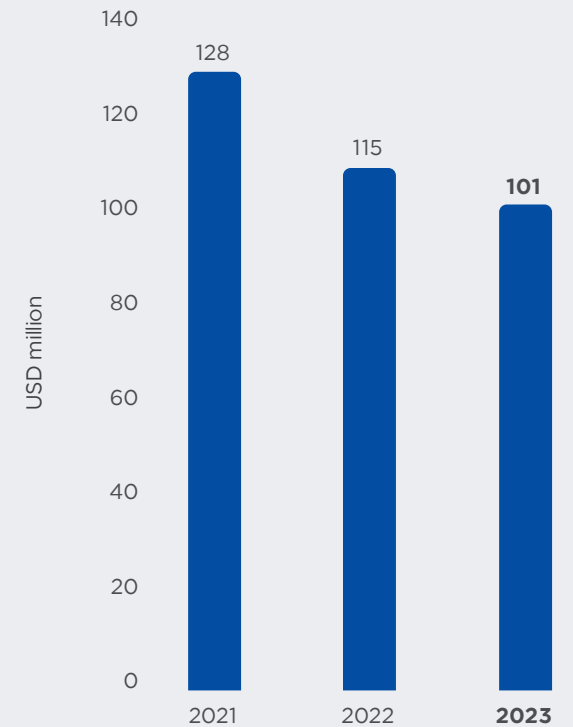


Notes: ¹ The timeframe for analysis is limited to 2021-2023 as many of Axiata's digital businesses in Malaysia are in the nascent stage and only showed signs of operational maturity from 2021 onwards
Source: KPMG analysis

Investing and Innovating for the Long Term

Total **accumulated capital investment** by Axiata's operations in Malaysia over the last three years **was USD343 million**. In 2023, Axiata continued to make significant investments of USD101 million. This continuous investment paves the way for Axiata's development of digital services, spurring long-term development and ongoing significant contribution to the Malaysian economy. (Figure 3)

Figure 3: Total capital investment 2021-2023



Notes: ¹ The timeframe for analysis is limited to 2021-2023 as many of Axiata's digital businesses in Malaysia are in the nascent stage and only showed signs of operational maturity from 2021 onwards
Source: Axiata and KPMG analysis. Totals may not add up due to rounding

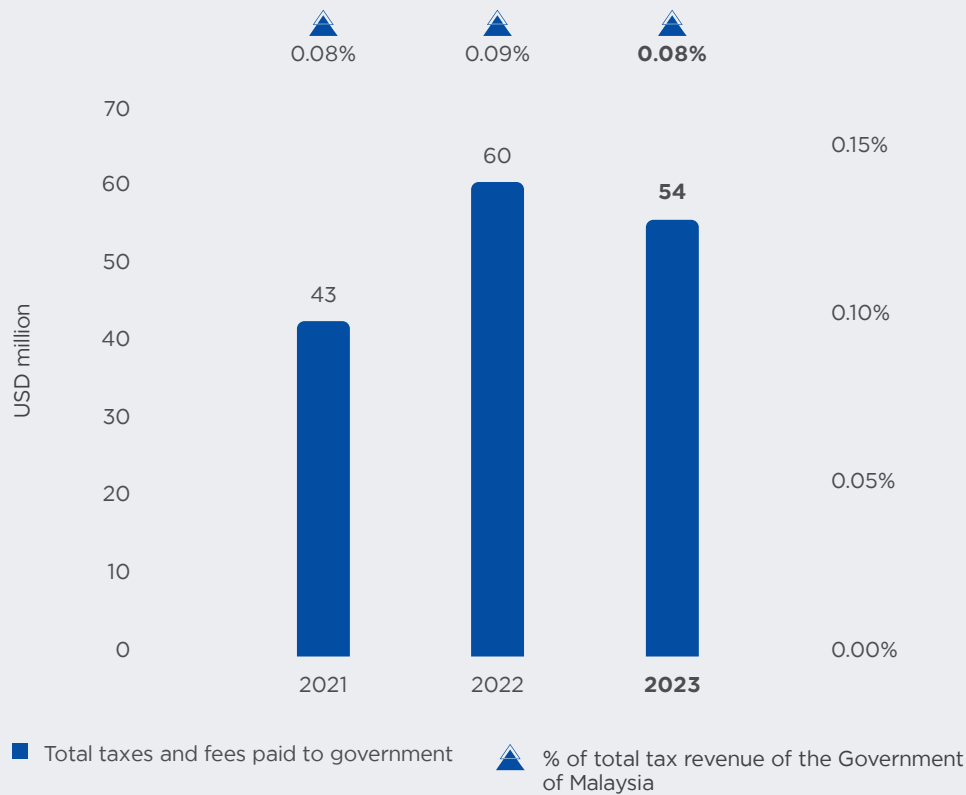
NATIONAL CONTRIBUTION REPORT

Contributions to Public Finance

Total **accumulated taxes and fees paid** to public finance over the last three years reached **USD157million**. Annual taxes and fees paid have been relatively consistent from 2021 to 2023 and have broadly maintained the same contribution as a percentage of total government revenue.

In 2023, Axiata and its subsidiaries contributed **USD54 million in total taxes and fees paid, accounting for 0.08%** of the total tax revenue of the Government of Malaysia. (Figure 4)

Figure 4: Total taxes and fees paid to public finance 2021-2023



Total Employment Impact

Axiata’s digital businesses and group operations directly **provided 2,437 jobs** in 2023. 92% of total employees were Malaysian, and around **44.6% of the employees were female**, which is higher than the national level recorded at 39%.

These operations in Malaysia indirectly supported **an additional 9,972 jobs** in Malaysia through its suppliers and a further 4,107 jobs were supported by capital investments. The total number of employees supported decreased from 17,596 in 2022 to 16,516 in 2023. (Figure 5)

Figure 5: Total employment impact 2023



NATIONAL CONTRIBUTION REPORT

CelcomDigi



IAR, Our Triple Core Business, Key Associate Company - CelcomDigi Berhad on page 80

CelcomDigi was formed through a merger between Celcom and Digi in November 2022. Post-merger, CelcomDigi remains as a significant contributor to the Malaysian economy and also a material Key Associate Company of Axiata Group. While Axiata retains a 33.1% stake in CelcomDigi, which justifies its inclusion in this report, the full contributions of CelcomDigi to the economy are presented in the section.

Contribution to Gross Value Added (GVA)

USD3,454 million (0.9% of the Nation's GDP)

Operational Direct GVA
USD1,276 million

Capital Investment GVA
USD371 million

Operational Indirect and Induced GVA: **USD1,577 million**

Productivity GVA
USD230 million

- CelcomDigi's total Gross Value Added (GVA) contribution to the Malaysian economy reached **USD3,454 million**, accounting for **0.9%** of the national GDP in 2023
- CelcomDigi's operations directly and indirectly contributed **USD2,853 million**, accounting for **82.6%** of total contribution
- A further **USD371 million** GVA was generated by CelcomDigi's capital investment, accounting for **11%** of total contribution
- Contribution from productivity improvement was **USD230 million**, accounting for **7%** of the total contribution

Direct Employees

3,655

Female
48%

- 3,655 staff** were directly employed by CelcomDigi in 2023
- around **48% of total employees are women**

Total Jobs Supported

87,074

Directly Employed 3,655	Operational Indirectly supported 64,853	Supported by Capital Investment 18,566
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- Overall, CelcomDigi supported **87,074 jobs** in 2023 through its operations and capital investments
- CelcomDigi's operations directly and indirectly supported **68,508 jobs**, accounting for 78.7% of total employment contribution
- A further **18,566 jobs** were supported by CelcomDigi's capital investments

Capital + Operational Expenditure

USD1,907 million

Capital Expenditure USD398 million	Operational Expenditure USD1,509 million	Every USD1 Spent on capex	Translated to USD8.7 GVA Contribution ³
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- CelcomDigi's total Capital and Operational Expenditure reached **USD1,907 million** in 2023, with Capital Expenditure recorded at USD398 million (21%) and Operational Expenditure at USD1,509 million (79%).
- CelcomDigi added **USD8.7 GVA** to the Malaysian economy in 2023 for every USD1 spent through its capital investment

Contribution to Public Finance

USD135 million

(**0.2%** of total tax revenue of the government)

- CelcomDigi contributed **USD135 million** in total taxes and fees paid, accounting for **0.2%** of total tax revenue of the Malaysian federal government⁴

Note: ¹ Totals may not add up due to rounding
² Figures in this section are based on data retrieved from CelcomDigi's Integrated Annual Report Year 2023 encompassing financials, employment and subscribers
³ Including GDP contribution from productivity impact
⁴ Total tax revenue for the government in 2023 was estimated at RM303,200 million (Source: Ministry of Finance, Malaysia)

NATIONAL CONTRIBUTION REPORT

Indonesia



Link Net's performance and relevant metrics are only included in this section from 2022 onwards.

IAR. Our Triple Core Business, XL Axiata Review on pages 62 to 63 and Link Net Review on pages 72 to 73

By consistently expanding their coverage and upgrading their offerings, XL and Link Net supports the growing 4G/5G penetration in the country, creating network effects and productivity gains through connectivity.

Scaling Up Connectivity and Accessibility

XL and Link Net are doing their part in expanding their coverage and upgrading their offerings. Their initiatives include:

- XL and Link Net are orchestrating an accelerated delayering in Indonesia with proposed transformation of XL into a Converged ServeCo to capture Fixed Broadband (FBB) and Fixed Mobile Convergence (FMC) demand, and Link Net into a fibre InfraCo (FibreCo) to scale up FTTH access to eight million homes over the next five years
- XL has emphasised convergence, resulting in an additional 235,000 Fibre to the Home (FTTH) subscribers connected and expanded coverage in 86 cities
- XL also continued its rural connectivity programme in collaboration with BAKTI
- Link Net has upgraded HFC bandwidth from 3.2MHz to 6.4MHz to enable more capacity for HFC customers

SNCR. Network Quality & Connectivity on page 33

Contribution to Gross Value Added (GVA)

USD3,434 million
(0.3% of the Nation's GDP)

Operational Direct GVA
USD1,314 million

Operational Indirect and Induced GVA: **USD1,393 million**

Capital Investment GVA
USD594 million

Productivity GVA
USD133 million

- XL and Link Net's total Gross Value Added (GVA) contribution to the Indonesian economy reached **USD3,434 million**, accounting for **0.3%** of the total national GDP in 2023
- XL and Link Net's operations directly and indirectly contributed **USD2,707 million**, accounting for **79%** of total GVA contribution
- A further **USD594 million** was contributed by XL and Link Net's capital investment, accounting for **17%** of total GVA contribution
- Contribution from productivity improvement was **USD133 million**, accounting for **4%** of the total GVA contribution

Direct Employees 2,372

XL Direct Employees 1,495	Female 29.1%	Indonesian 99%
Link Net Direct Employees 877		

- In total, approximately **2,372 staff** were directly employed by XL and Link Net in 2023
- Around **29% of total employees** were women
- Indonesian citizens accounted for **99% of total employees**

Capital + Operational Expenditure USD1,858 million

Capital Expenditure XL: USD470 million Link Net: USD180 million	Operational Expenditure XL: USD1,079 million Link Net: USD129 million	Every USD1 Spent on capex Translated to USD5.3 GVA Contribution
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- XL and Link Net's total Capital and Operational Expenditure reached **USD1,858 million** in 2023, with Capital Expenditure recorded at **USD650 million (35%)** and Operational Expenditure at **USD1,208 million (65%)**
- XL and Link Net added **USD5.3 GVA** to the Indonesian economy in 2023 for every USD1 spent through its capital investment

Total Jobs Supported 267,723

Directly Employed 2,372	Operational Indirectly Supported 141,958	Supported by Capital Investment 123,393
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- Overall, XL and Link Net supported **267,723 jobs** in 2023 through its operations and capital investments
- XL and Link Net's operations directly supported **2,372 jobs** and indirectly supported **141,958 jobs**
- Capital investment generated approximately **123,393 jobs**

Contribution to Public Finance USD370 million

(**0.2%** of total tax revenue of the government)

XL: **USD361 million**
Link Net: **USD9 million**

- XL and Link Net contributed **USD370 million** in total taxes and fees paid, accounting for **0.2%** of total tax revenue of the government of Indonesia²

Notes: ¹ Totals may not add up due to rounding
² Total tax revenue of the government was Rp2,774 trillion (USD182 billion). (Source: Ministry of Finance, Indonesia Preliminary Realisation government revenue)

NATIONAL CONTRIBUTION REPORT

XL and Link Net's Total Economic Contribution to Indonesian Economy

Led by XL and Link Net's total operating expenditure of USD1,209 million and capital investment of USD650 million, the company's total Gross Value Added (GVA) contribution to Indonesia's economy was **USD3,434 million**, accounting for **0.3% of national GDP**.

XL and Link Net's operations **directly** contributed **USD1,314 million**, accounting for **38%** of total GVA contribution. **Another USD1,393 million was indirectly generated** through the expenditures by XL and Link Net's suppliers. For every USD1 XL and Link Net contributed directly to Indonesia's economy, approximately another **USD1.1** was generated indirectly through local suppliers, **higher than a general industry of USD0.6**¹.

A further **USD594 million** was contributed by XL and Link Net's capital investment with a share of 17% of total GVA contribution. GVA contribution from productivity improvement was estimated at **USD133 million**, accounting for 4% of total GVA contribution. (Figure 1)

Figure 1: GVA Contribution to the Indonesian economy 2023

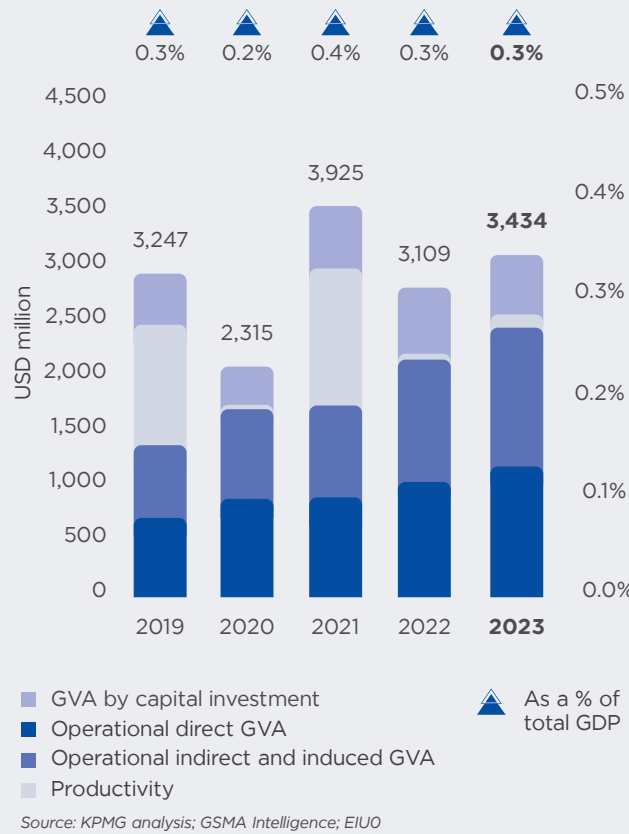


XL and Link Net's Total Economic Contribution Over the Last Five Years

XL & Link Net's total GVA contribution in Indonesia increased from USD3,247 million in 2019 to USD3,434 million in 2023. Total GVA contribution **increased from USD3,109 million in 2022 to USD3,434 million** in 2023, supported by growth in operational profits and the number of 4G subscribers in the country.

However, the contribution remains lower than that of 2021 (USD3,925 million) due to **the significant increase in mobile connections in 2021, which was not repeated in 2023**. (Figure 2)

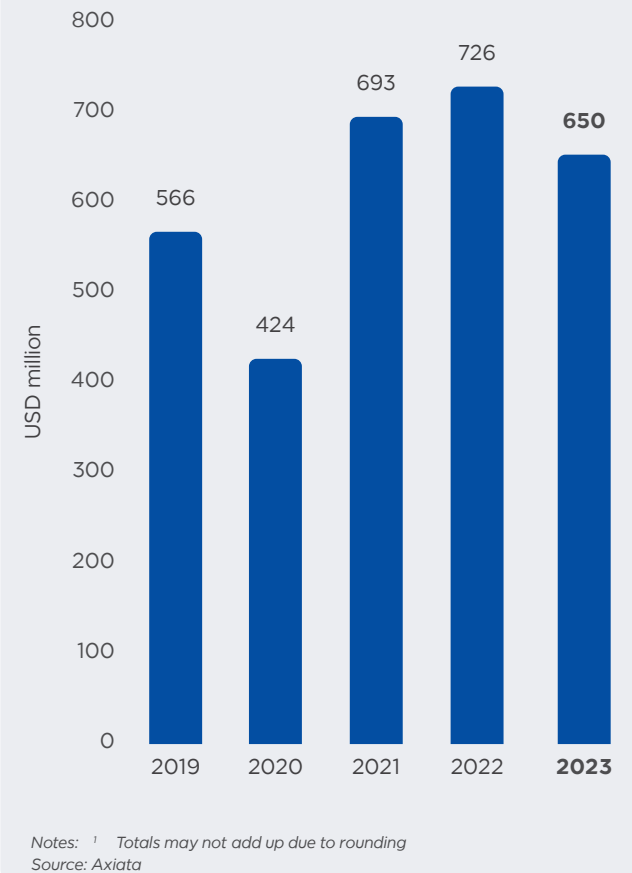
Figure 2: GVA Contribution to the Indonesian economy 2019-2023



Investing and Innovating for the Long Term

Total **accumulated capital investment** by Axiata in Indonesia over the last five years **reached USD3,058 million**. In 2023, total capital investment was USD650 million. Over 2019 to 2023, capital investment grew from USD566 million to USD650 million. Continuing capital investment supports XL and Link Net's development in Indonesia and makes a significant contribution to the Indonesian economy. (Figure 3)

Figure 3: Total capital investment 2019-2023



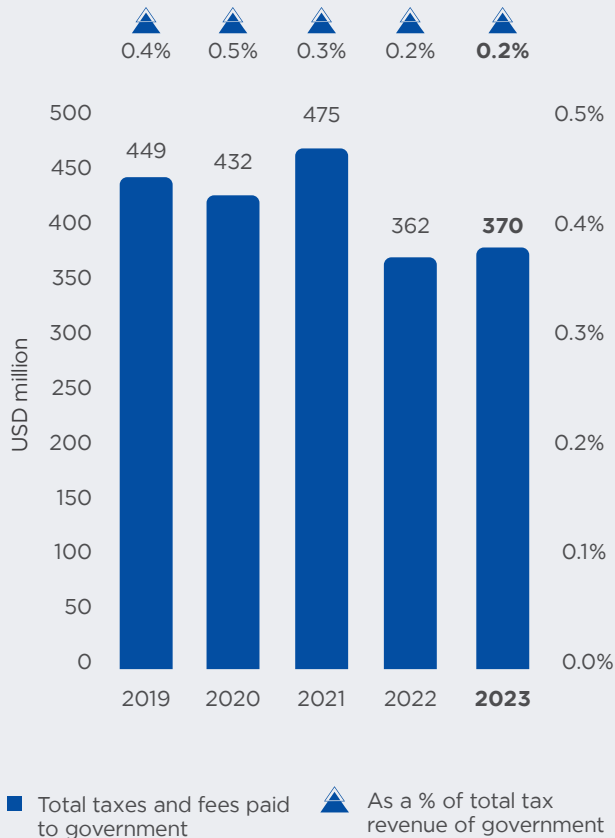
NATIONAL CONTRIBUTION REPORT

Contributions to Public Finance

Total **accumulated taxes and fees paid** to public finance over the last five years reached **USD2,086 million**.

Annual taxes and fees paid remained consistent from 2022 to 2023 at **USD370 million in 2023, accounting for 0.2%** of total tax revenue of the Government of Indonesia. (Figure 4)

Figure 4: Total taxes and fees paid to public finance 2019-2023



Source: Axiata and KPMG analysis

Total Employment Impact

XL directly **provided 1,495 jobs** while Link Net **provided 877 jobs** in 2023. **99% of total employees** were Indonesian and around **29% of employees were women**.

A further **141,958 jobs** were supported indirectly by the total operations in Indonesia. XL and Link Net's capital investment supported **123,393 jobs**. (Figure 5)

Figure 5: Total employment impact 2023



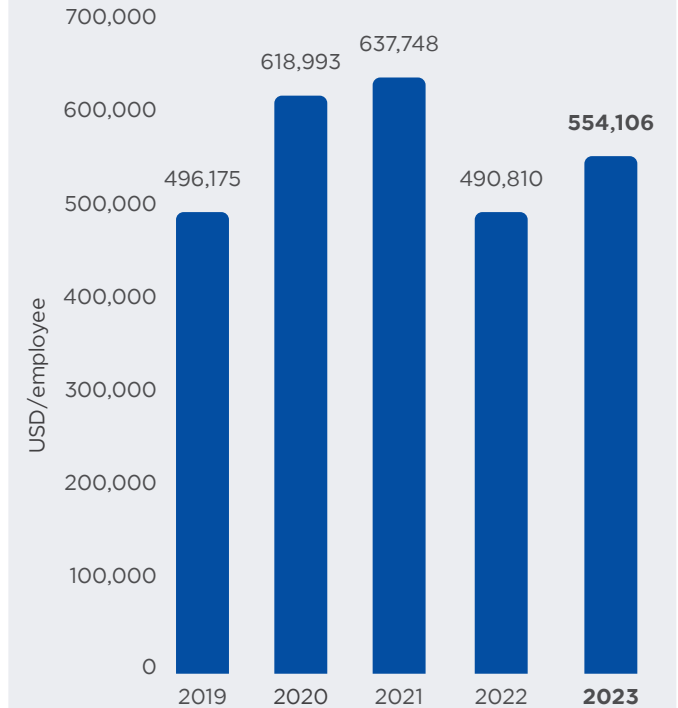
Notes: ¹ Totals may not add up due to rounding
Source: KPMG analysis

XL & Link Net's Labour Productivity in Indonesia Over the Last Five Years

XL & Link Net's productivity in Indonesia, measured as Gross Value Added (GVA) per employee, was **USD554,106** in 2023. It **grew by a CAGR of 2.8%** from USD496,175 in 2019.

Labour productivity was lower for the first time in 2022 due to the increase in the number of employees resulting from XL's acquisition of Link Net. Labour productivity in 2023 was higher than 2022 due to an increase in operational profit and employees compensation. (Figure 6)

Figure 6: XL and Link Net's labour productivity 2019-2023



Source: KPMG analysis

NATIONAL CONTRIBUTION REPORT

Sri Lanka



IAIAR, Our Triple Core Business, Dialog Axiata Review on pages 64 to 65

Technology and trends such as Artificial Intelligence has the potential to transform businesses and operations. Dialog has tapped into these technologies to streamline their operations and enhance their offerings, boosting productivity.

Improving Customer Experience Through AI

Leveraging the power of technology, Dialog has implemented an AI-powered Virtual Digital Assistant (DIA), which offers a seamless and autonomous virtual assistant experience.

- With features like first-contact resolution, intelligent ticket classification and trilingual support, DIA simplifies problem escalation and significantly reduces effort required for resolution
- By the end of 2023, DIA captured nearly 100% more chat resolutions, enhancing the customer experience

SNCR, Customer Experience on page 38

Contribution to Gross Value Added (GVA)

USD801 million
(0.9% of the Nation's GDP)

Operational Direct GVA
USD228 million

Operational Indirect and Induced GVA: **USD233 million**

Capital Investment GVA
USD70 million

Productivity GVA
USD270 million

- Dialog's total Gross Value Added (GVA) contribution to the Sri Lankan economy reached **USD801 million**, accounting for **0.9%** of total national GDP in 2023
- Dialog's operations directly and indirectly contributed **USD461 million**, accounting for **58%** of total GVA contribution
- Capital investments contributed **USD70 million**, representing a share of **9%** of total GVA contribution
- GVA contribution due to the productivity improvement was **USD270 million**, accounting for **34%** of the total GVA contribution

Direct Employees 1,756

Female **24%** | Sri Lankan **99.8%**

- **1,756 staff** were directly employed by Dialog in 2023
- Around **24% of total employees** were women
- Sri Lankans accounted for **99.8% of total employees**

Total Jobs Supported 65,493

Directly Employed 1,756	Outsourced 148	Operational Indirectly Supported 22,169	Supported by Capital Investment 41,420
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- Overall, Dialog supported approximately **65,493 jobs** in 2023 through its operations and capital investments
- Dialog's operations directly supported **1,756 jobs** and indirectly supported **22,169 jobs**
- Dialog's capital investment supported **41,420 jobs**

Capital + Operational Expenditure USD461 million

Capital Expenditure USD75 million	Operational Expenditure USD386 million	Every USD1 Spent on capex	Translated to USD10.7 GVA Contribution ¹
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- Dialog's total Capital and Operational Expenditure reached **USD461 million** in 2023, with Capital Expenditure recorded at **USD75 million** (16%) and Operational Expenditure at **USD386 million** (84%)
- Dialog added **USD10.7 GVA** to the Sri Lankan economy in 2023 for every USD1 spent through its capital investment

Contribution to Public Finance USD124 million

(1.5% of total tax revenue of the government)

- Dialog contributed **USD124 million** in total taxes and fees paid, accounting for **1.5%** of total tax revenue of the government of Sri Lanka¹

Note: ¹ Total tax revenue of the government in Sri Lanka was LKR2,373 billion (USD8 billion). (Source: Ministry of Finance, Sri Lanka)
² Totals may not add up due to rounding

NATIONAL CONTRIBUTION REPORT

Dialog’s Total Economic Contribution to the Sri Lanka Economy

Dialog’s substantial operational activities and capital investment contributed significantly to the Sri Lankan economy in 2023. Led by Dialog’s total **operating expenditure of USD386 million and capital investment of USD75 million**, the Dialog’s total Gross Value Added (GVA) contribution to Sri Lanka’s economy was **USD801 million** in 2023, accounting for **0.9%** of national GDP.

Dialog’s operations directly contributed **USD228 million**, representing a share of **28%** of total GVA contribution. Another **USD233 million was indirectly generated** through the expenditures by Dialog’s suppliers, accounting for **29% of total GVA**. For every USD1 Dialog contributed directly to the economy, **another USD1** was generated indirectly through local suppliers, higher than a **general industry average of USD0.4¹**.

Productivity improvements contributed **USD270 million**, accounting for **34%** of total GVA. Dialog’s capital investment contributed a further **USD70 million** with a share of **9%** of total GVA. (Figure 1)

Figure 1: GVA Contribution to the Sri Lankan economy 2023



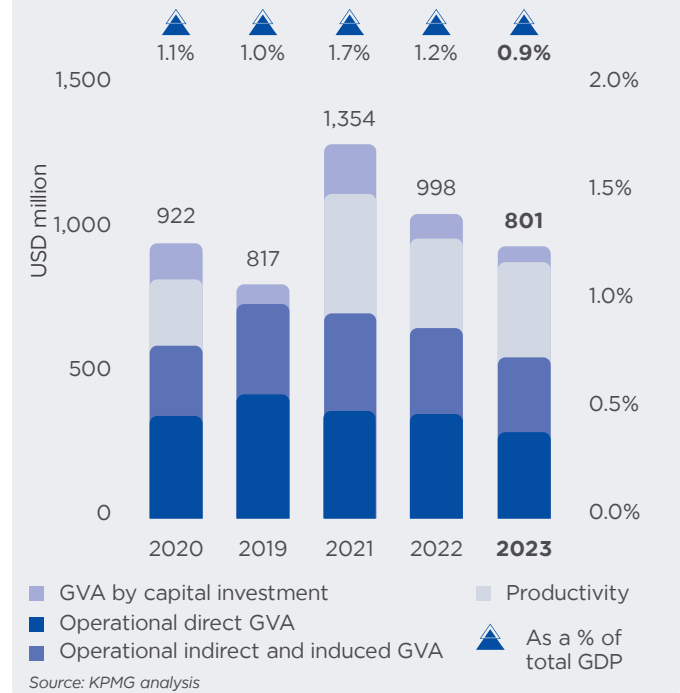
Notes: ¹ Based on simple average of general industry
² Totals may not add up due to rounding
 Source: KPMG analysis; ADB 2006

Dialog’s Total Economic Contribution Over the Last Five Years

Dialog’s total GVA contribution **fell at a CAGR of 3.4%** from **USD922 million to USD801 million** over the last five years. The contribution accounted for 0.9% of the nation’s GDP in 2023. This is mainly driven by a decrease in Operational direct GVA and Operational indirect and induced GVA from 2021 onwards, both of which can be attributed to a sharp decline in operational profits. The lower operational profits remain in 2023 due to the inflationary impact, exposure to a depreciated exchange rate, and organisational transformation costs resulting from the financial crisis in 2022.

From 2022 to 2023, productivity improvements also decreased from **USD349 million to USD270 million**, due to the extensive uptake of 4G connections in 2022 which was not observed in 2023. (Figure 2)

Figure 2: Figure 2: GVA Contribution to the Sri Lankan economy 2019-2023

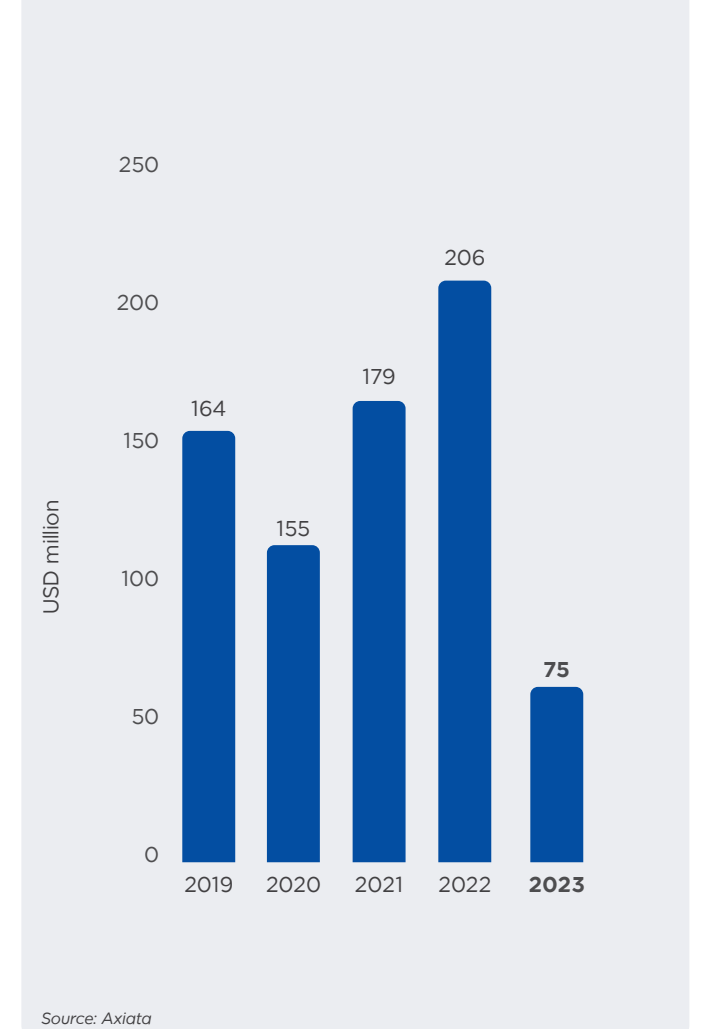


Source: KPMG analysis

Investing and Innovating for The Long Term

Dialog’s total **accumulated capital investment reached USD779 million** over 2019-2023. Capital investment was **USD75 million** in 2023. Continuous capital investment supports Dialog’s long-term development and contributes to the growth of the Sri Lankan economy. (Figure 3)

Figure 3: Total capital investment 2019-2023



Source: Axiata

NATIONAL CONTRIBUTION REPORT

Contributions to Public Finance

From 2019 to 2023, Dialog has contributed **USD634 million** of taxes and fees to public finance. Annual taxes and fees paid decreased over this period, from USD186 million in 2019 to **USD124 million** in 2023.

In 2023, Dialog's taxes and fees paid **accounted for 1.5%** of total tax revenue of Sri Lanka's government. (Figure 4)

Total Employment Impact

Dialog's direct operations generated **1,756 jobs** in 2023. **24%** of the total employees were female. Dialog was dominated by Sri Lankans as **99.8%** of total employees were locals.

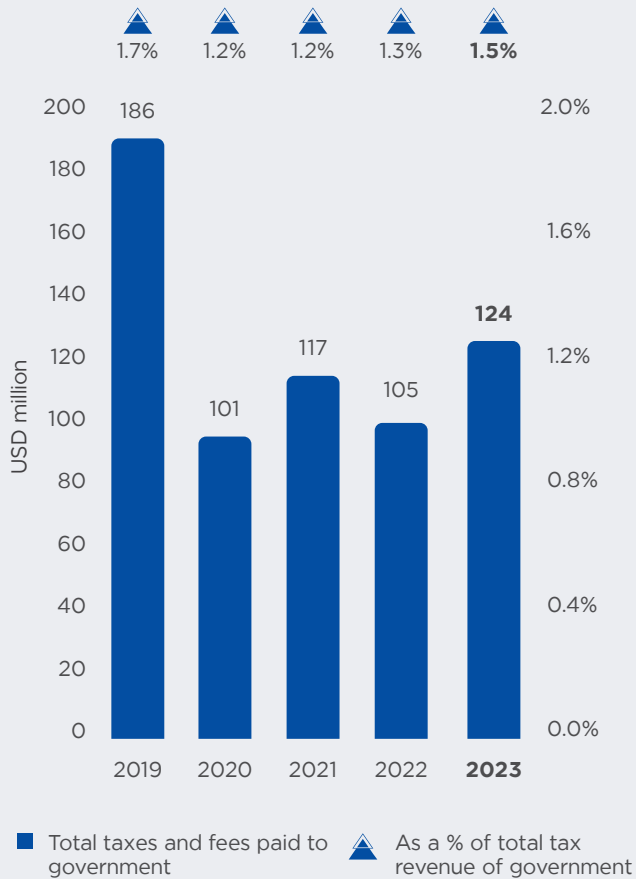
A further **22,169 jobs** were supported indirectly by Dialog's operations. Its capital investment supported **41,420 jobs**. (Figure 5)

Dialog's Labour Productivity

Dialog's productivity, measured as Gross Value Added (GVA) per employee, **increased by a CAGR of 10%** from USD81,755 in 2019 to **USD119,544** in 2023.

An increase in labour productivity of **84.7%** was observed for 2023 due to a sharp decline in the number of direct employees, from 3,041 in 2022 to 1,756 in 2023. (Figure 6)

Figure 4: Total taxes and fees paid to public finance 2019-2023



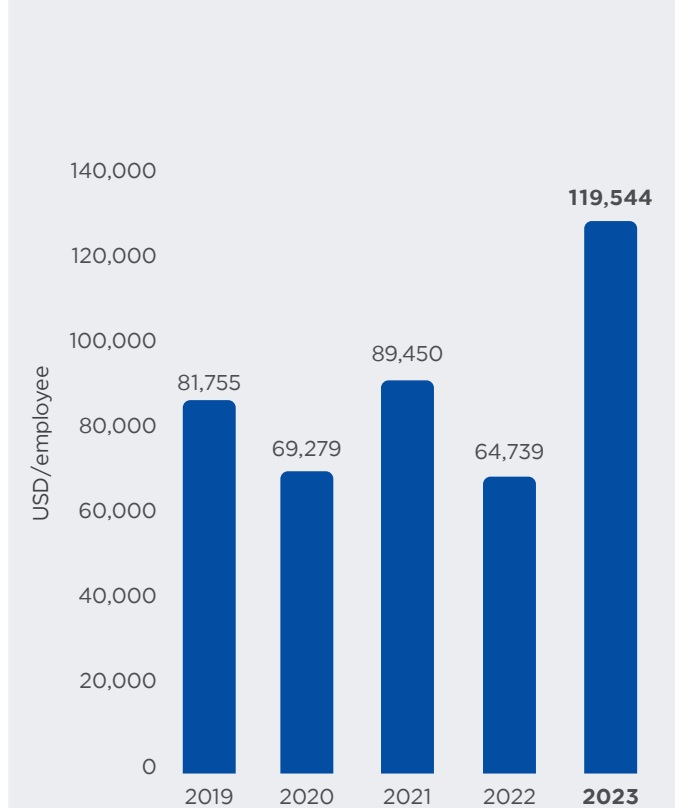
Source: Axiata and KPMG analysis

Figure 5: Total employment impact 2023



Notes: ¹ Totals may not add up due to rounding
Source: KPMG analysis

Figure 6: Dialog's labour productivity 2019-2023



Source: Axiata

NATIONAL CONTRIBUTION REPORT

Bangladesh



📖 **IAR**, Our Triple Core Business, Robi Axiata Review on pages 66 to 67

Robi has continuously invested in their infrastructure, in order to provide customers with comprehensive and seamless user experiences.

Infrastructure Investments

Robi has maintained a significant level of capital investments over the years, building infrastructure and creating value for the country. Investments in 2023 include:

- Deployed approximately 1,000 new sites, increasing nationwide basic indoor coverage from 90% to 92%
- Integrated 3,500 L2600 co-location sites into the network, resulting in over 50% improvement in user experience

Phasing Out of 3G Network

In 2023, Robi successfully completed 3G network shutdown in most part of the country except Dhaka

📖 **SNCR**, Network Quality & Connectivity on page 33

Contribution to Gross Value Added (GVA)

USD1,662 million
(0.4% of the Nation's GDP)

Operational Direct GVA
USD466 million

Operational Indirect and Induced GVA: **USD435 million**

Capital Investment GVA
USD199 million

Productivity GVA
USD561 million

- Robi's total Gross Value Added (GVA) contribution to the Bangladeshi economy reached **USD1,662 million**, accounting for **0.4%** of total national GDP in 2023
- Robi's operations directly and indirectly contributed **USD901 million**, accounting for **54%** of total GVA contribution
- Capital investments contributed **USD199 million** with a share of **12%** of total GVA
- GVA contribution due to the productivity improvement was **USD561 million**, accounting for **34%** of the total GVA

Direct Employees³ 1,243

Female 13.2%	⋮	Bangladeshi 99.5%
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- **1,243 staff** were directly employed by Robi in 2023
- **13.2% of total employees** were women
- Bangladeshi citizens accounted for **99.5% of total employees**

Total Jobs Supported 109,176

Directly Employed 1,243	⋮	Operational Indirectly Supported 76,829	⋮	Supported by Capital Investment 31,104
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- Overall, Robi supported **109,176 jobs** in 2023 through its operations and capital investments
- Robi's operations directly supported **1,243 jobs** and indirectly supported **76,829 jobs**
- Robi's capital investment supported **31,104 jobs**

Capital + Operational Expenditure USD674 million

Capital Expenditure USD176 million	⋮	Operational Expenditure USD498 million	⋮	Every USD1 Spent on capex	Translated to	USD9.4 GVA Contribution ¹
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- Robi's total Capital and Operational Expenditure reached **USD674 million** in 2023, with Capital Expenditure recorded at **USD176 million** (26%) and Operational Expenditure at **USD498 million** (74%)
- Robi added **USD9.4 GVA** to the Bangladeshi economy in 2023 for every USD1 spent through its capital investment

Contribution to Public Finance USD448 million

(1.1% of total tax revenue of the government)

- Robi contributed **USD448 million** in total taxes and fees to government, accounting for **1.1%** of total tax revenue of the government of Bangladesh²

Note: ¹ Including GDP contribution from market penetration related productivity impact
² Total tax revenue of the government was budgeted at BDT4,500 billion (USD41.7 billion) (Source: Ministry of Finance, Bangladesh)
³ Employees consists of Robi only

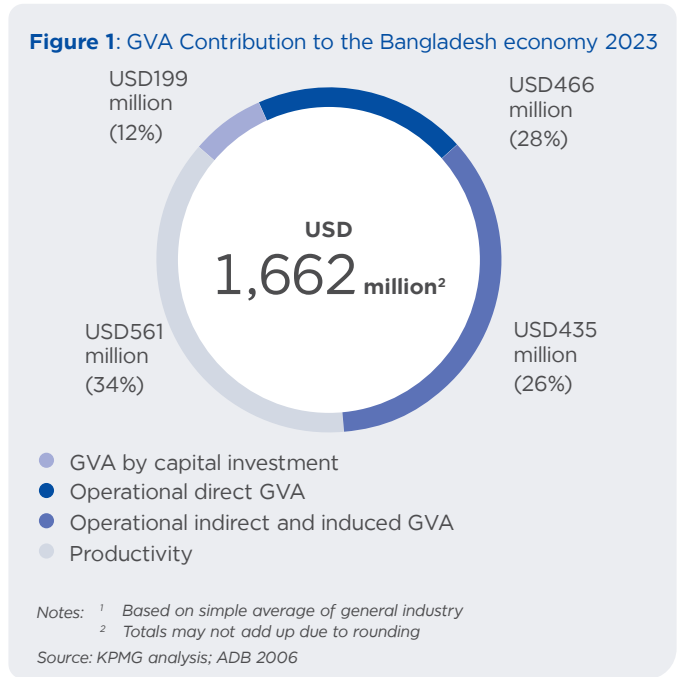
NATIONAL CONTRIBUTION REPORT

Robi's Total Economic Contribution to The Bangladesh Economy

Robi's substantial operations and investments in Bangladesh contributed significantly to the country's economic growth. **With a total operating expenditure of USD498 million and capital investment of USD176 million**, Robi contributed **USD1,662 million** to the economy of Bangladesh in 2023, accounting for **0.4%** of national GDP.

Robi's operations **directly contributed USD466 million**, accounting for **28%** of total GVA contribution. Another **USD435 million** was indirectly generated through the expenditures by Robi's suppliers. **For every USD1 Robi directly** added to Bangladeshi economy, **it generated just under another USD0.9 indirectly** from local suppliers, higher than an average of USD0.4 for general industry¹.

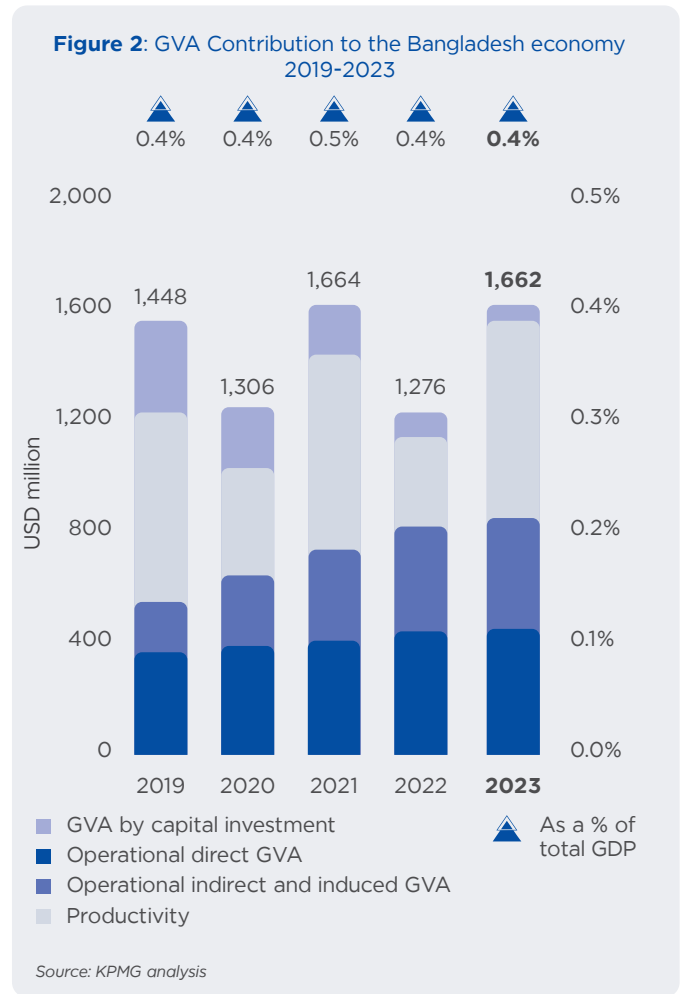
Productivity improvements contributed **USD561 million**, accounting for **34%** of total GVA. **Capital investment** contributed a further **USD199 million**, representing a share of **12%** of the total GVA. (Figure 1)



Robi's Total Economic Contribution Over The Last Five Years

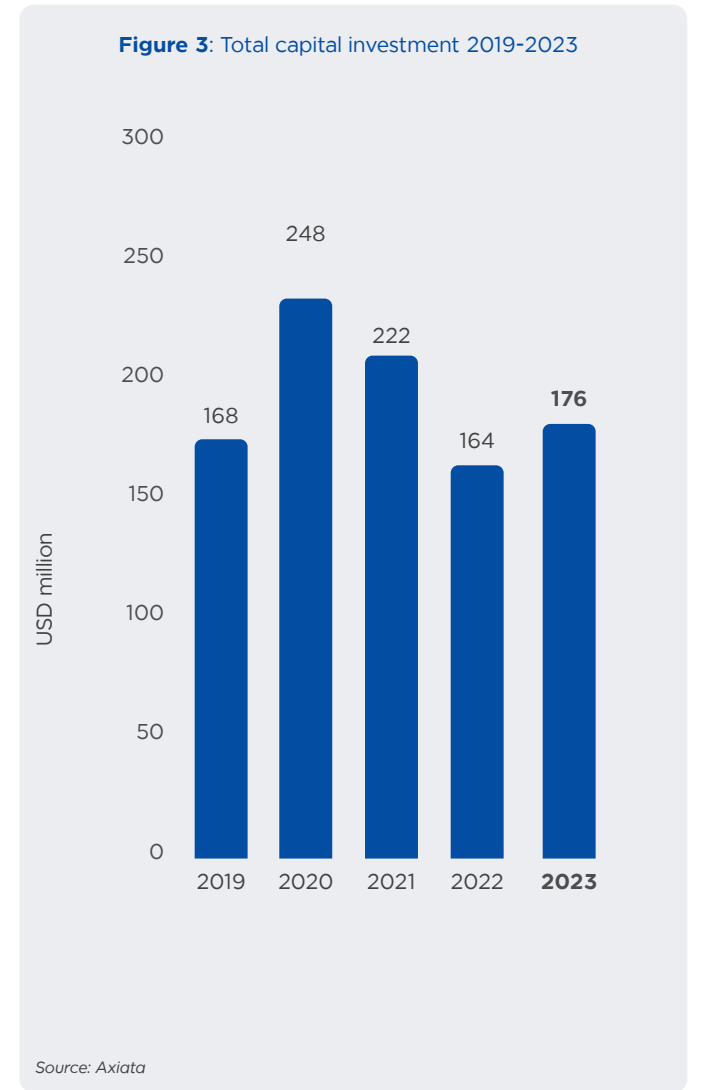
Robi's total GVA contribution **increased at a CAGR of 3.5%** from **USD1,448 million in 2019 to USD1,662 million in 2023**, representing **0.4%** of the national GDP in 2023.

Robi's total GVA **was higher in 2023** at USD1,662 million as GVA contribution from productivity impact increased from USD217 million in 2022 to USD561 million in 2023, due to the higher growth from mobile connections in 2023 compared to 2022. (Figure 2)



Investing and Innovating for The Long Term

Robi's capital investment was **USD176 million in 2023**. The total **accumulated capital investment reached USD978 million** over the last five years. Capital investment plays an important role in facilitating long-term sustainable development of Robi's business and contributing to the growth of Bangladeshi economy. (Figure 3)

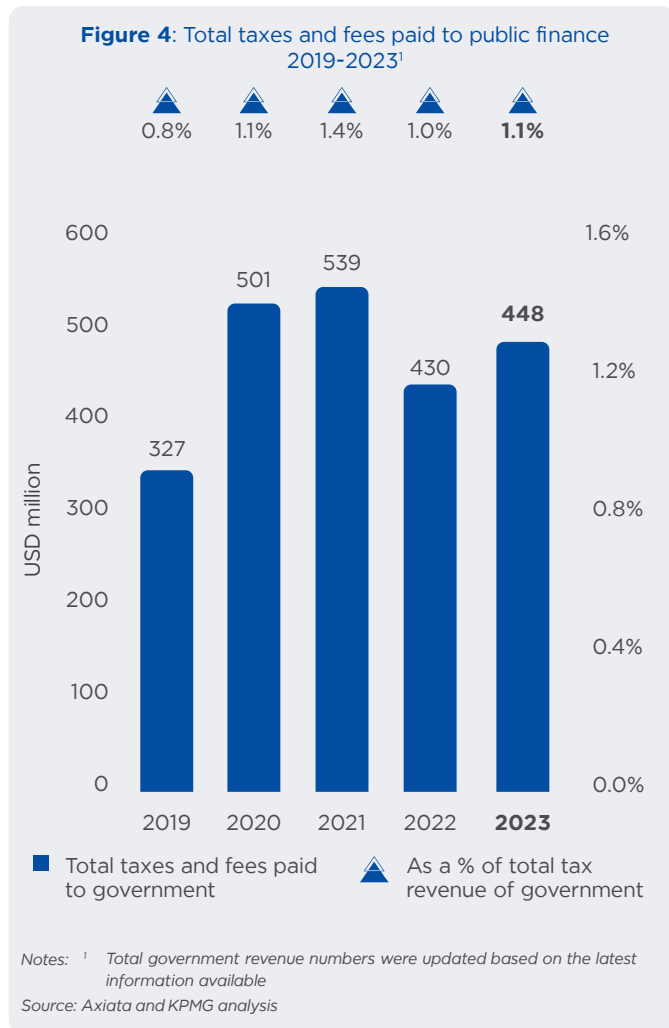


NATIONAL CONTRIBUTION REPORT

Contributions to Public Finance

Total **accumulated taxes and fees paid** to public finance over the last five years reached **USD2,245 million**.

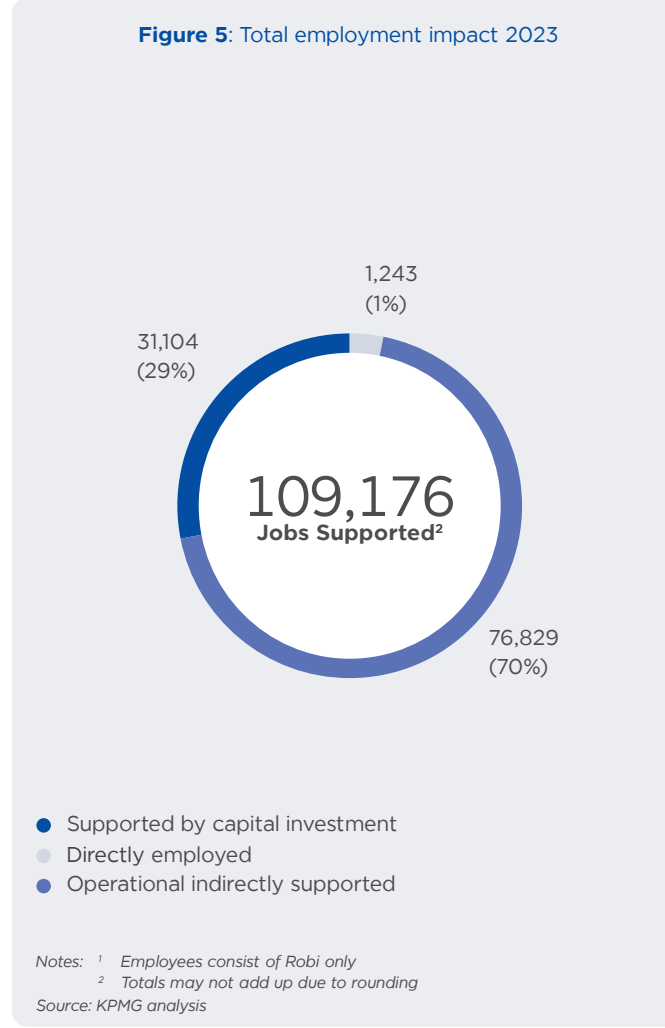
Annual taxes and fees paid in 2023 was **USD448 million**, accounting for **1.1%** of total tax revenue of the government of Bangladesh. (Figure 4)



Total Employment Impact

1,243 jobs¹ were directly provided by Robi's operations in 2023. 13.2% of Robi's employees were women. The firm is predominated by Bangladesh citizens with **99.5%**.

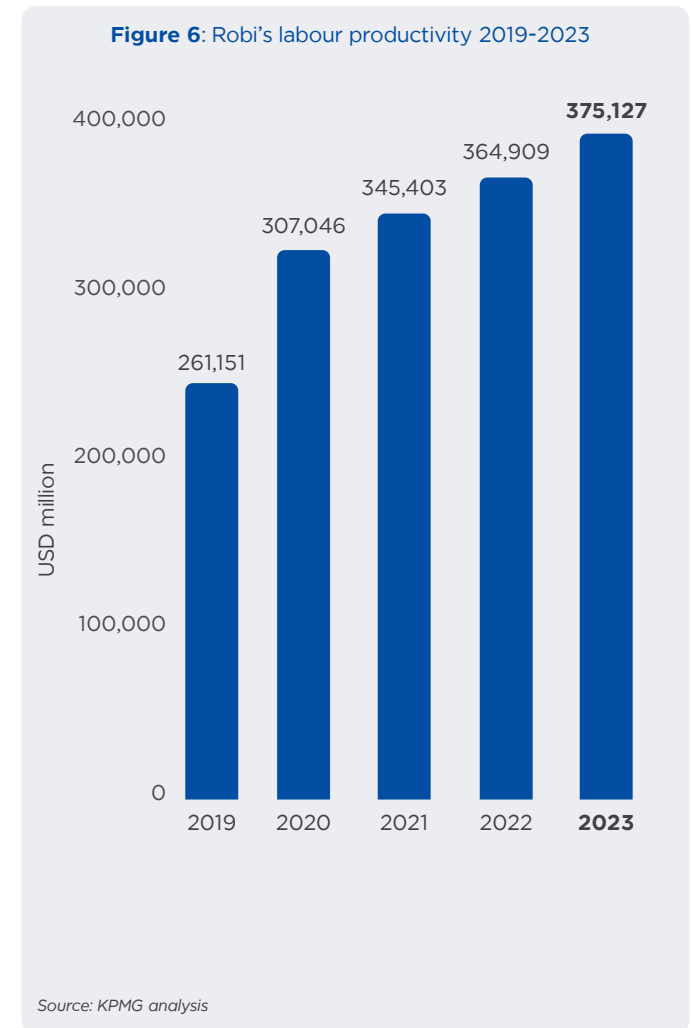
Robi's operations also indirectly supported **76,829 jobs**. A further **31,104 jobs were supported by** its capital investment. (Figure 5)



Robi's Labour Productivity

Robi's productivity, measured as Gross Value Added (GVA) per employee, increased by a **CAGR of 9.5% to USD 375,127 in 2023** from USD 261,151 in 2019. This growth was mainly driven by a decreasing employment number and increasing operating profits.

Robi's productivity increased slightly by 2.8% from USD364,909 per worker in 2022. (Figure 6)



NATIONAL CONTRIBUTION REPORT

Cambodia



IAIR, Our Triple Core Business, Smart Axiata Review on pages 68 to 69

Smart's commitment to network wide expansion and upgrades throughout the nation drives enhancement in infrastructure and boosts productivity.

Improving Connectivity

Smart has implemented a wide spectrum of initiatives to expand and improve network coverage. Through these efforts, Smart aim to bridge the digital divide, empower communities and foster socioeconomic development in Cambodia. Projects that have been initiated to improve network coverage include:

- Improving connectivity and reducing the digital divide by connecting the unconnected with high-speed 4G and 4.5G connectivity
- Allocated a major portion of its capex to increase coverage and connect more people with high-speed data connectivity
- Collaborated with the Telecommunication Regulator of Cambodia to enhance the quality of service and improve coverage
- Developed a long-term roadmap aimed at enhancing the quality of service at 357 sites, starting with central regions and completed 162 QoS sites by the end of 2023

SNCR, Network Quality & Connectivity on page 33

Contribution to Gross Value Added (GVA)

USD462 million
(1.4% of the Nation's GDP)

Operational Direct GVA
USD216 million

Operational Indirect and Induced GVA: **USD108 million**

Capital Investment GVA
USD59 million

Productivity GVA
USD78 million

- Smart's total Gross Value Added (GVA) contribution to Cambodian economy reached **USD462 million**, accounting for **1.4%** of total national GDP in 2023
- Smart's operations directly and indirectly contributed **USD324 million**, accounting for **70%** of total contribution
- **A further USD59 million** GVA was generated by Smart's capital investment, accounting for **13%** of total contribution
- **GVA** contribution due to the **productivity** increase was **USD78 million**, accounting for **17%** of the total GVA contribution

Direct Employees 1,113

Female **35.9%** | Cambodian **97.9%**

- **1,113 staff** were directly employed by Smart in 2023
- **36% of total employees** were women
- Cambodian citizens accounted for **97.9% of total employees**

Capital + Operational Expenditure USD251 million

Capital Expenditure **USD75 million** | Operational Expenditure **USD176 million** | Every **USD1** Spent on capex Translated to **USD6.2** GVA Contribution²

- Smart's total Capital and Operational Expenditure reached **USD251 million** in 2023 with Capital Expenditure recorded at **USD75 million** (30%) and Operational Expenditure at **USD176 million** (70%)
- Smart added **USD6.2 GVA** to the Cambodian economy in 2023 for every USD1 spent through its capital investment

Total Jobs Supported 48,493

Directly Employed **1,113** | Operational Indirectly supported **30,544** | Supported by Capital Investment **16,836**

- Overall, Smart supported **48,493 jobs** in 2023 through its operations and capital investments
- Smart's operations directly and indirectly supported over **31,657 jobs**
- A further **16,836 jobs** were supported by Smart's capital investments

Contribution to Public Finance USD127 million

(**3.5%** of total tax revenue of the government)

- Smart contributed **USD127 million** in total taxes and fees paid, accounting for **3.5% of total tax revenue** of Cambodian government²

Note: ¹ 2023 GDP estimated at USD32,170 million. (Source: As reported by Xinhua News Agency)
² Total tax revenue of the government in 2023 was estimated at USD3,612 million. (Source: As reported by The Phnom Penh Post)

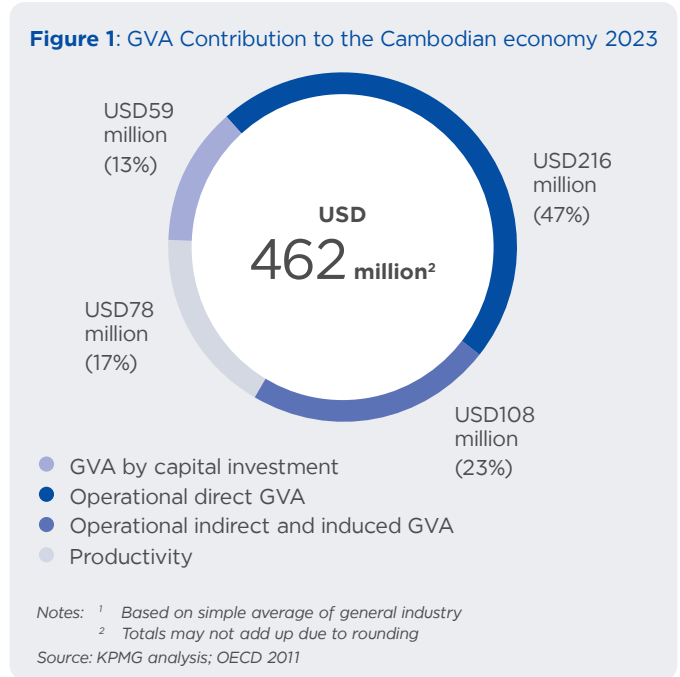
NATIONAL CONTRIBUTION REPORT

Smart's Total Economic Contribution to The Cambodian Economy

Smart's substantial operations and investments in Cambodia had a strong positive impact on the Cambodian economy in 2023. **With a total operating expenditure of USD176 million and capital investment of USD75 million**, Smart's total Gross Value Added (GVA) contribution to Cambodia's economy was estimated at **USD462 million** in 2023, accounting for **1.4% of national GDP**.

Smart's operations **directly contributed USD216 million**, accounting for **47% of total GVA** contribution. It also **indirectly contributed USD108 million** to economic activity. For every USD1 Smart contributed directly to Cambodia's economy, another **USD0.5** was generated indirectly through local suppliers, **higher than the general industry average of USD0.4**¹.

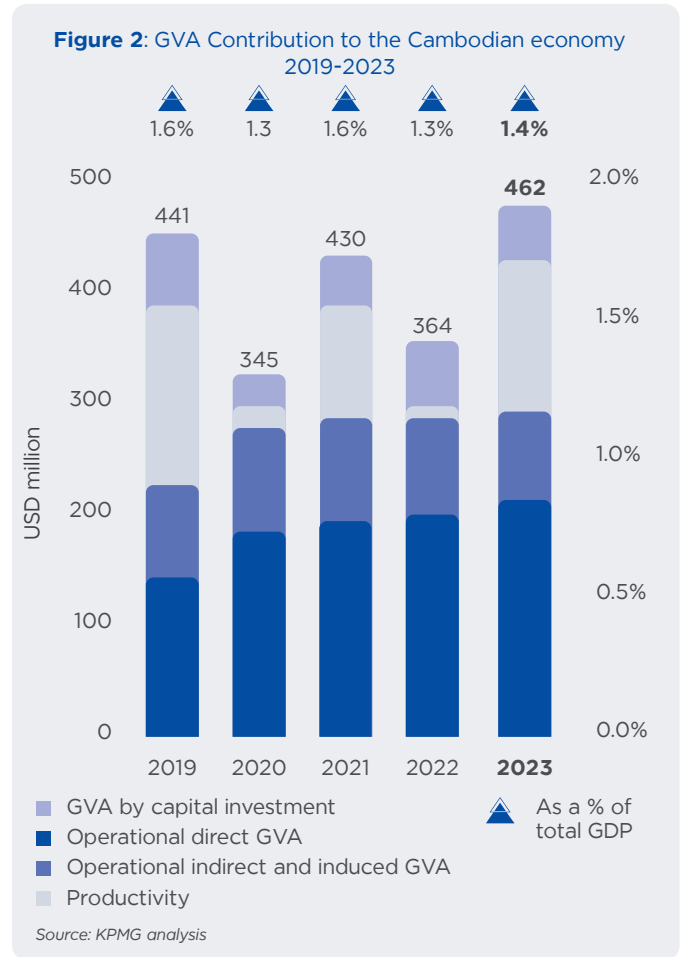
Capital investment contributed USD59 million, representing **13% of total GVA**. A further **USD78 million** was generated from **productivity improvements**, accounting for **17% of total GVA**. (Figure 1)



Smart's Total Economic Contribution Over The Last Five Years

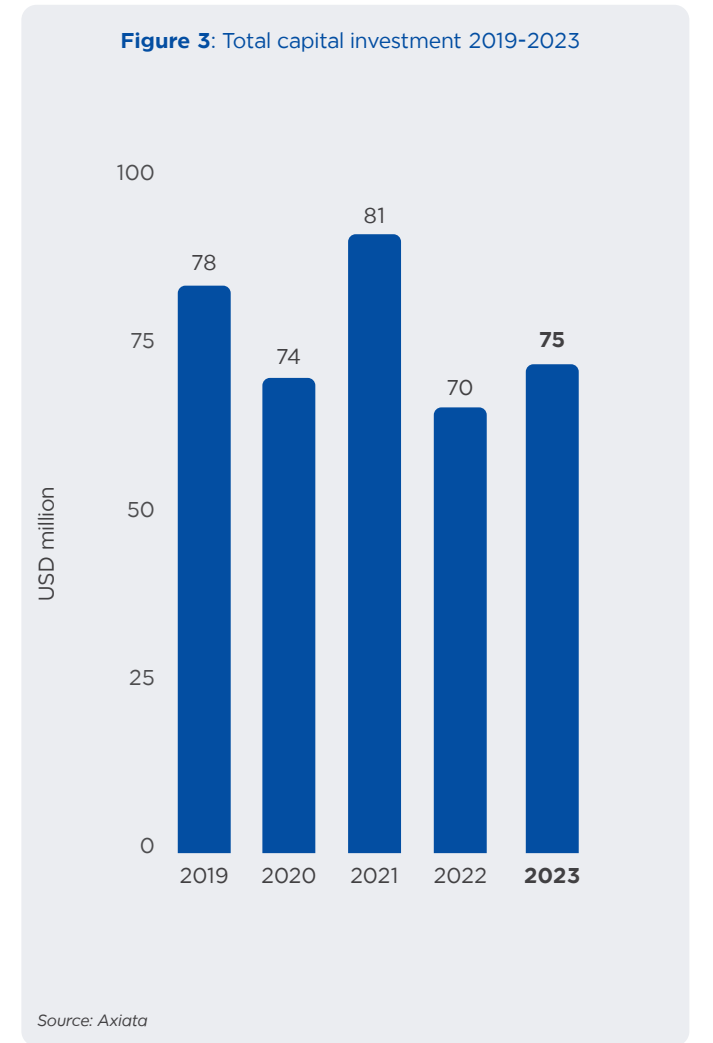
Smart's total GVA contribution **ranged between USD345 million and USD462 million** representing a share of the country's GDP between 1.3% and 1.6% during the last five years.

Over the last five years, total **operational profits** grew from **USD151 million to USD202 million** with a CAGR of 7.5%. Productivity gains in 2023 were higher as there was overall subscriber growth in the market driven by a significant increase in 4G subscribers. (Figure 2)



Investing and Innovating for The Long Term

Total **accumulated capital investment** by Smart over the last five years **reached USD377 million**. In 2023, capital investment **was USD75 million**, maintaining Axiata's capital expenditure over the five year period between USD70 million and USD80 million annually. Continuing capital investment supports Smart's development in Cambodia and makes a significant contribution to the Cambodian economy. (Figure 3)



NATIONAL CONTRIBUTION REPORT

Contributions to Public Finance

Total **accumulated taxes and fees paid** to public finance over the last five years reached **USD539 million**.

In 2023, Smart contributed **USD127 million** in total taxes and fees, accounting for **3.5% of total tax revenue** of Cambodian government, excluding regulatory related fees and payment. (Figure 4)

Total Employment Impact

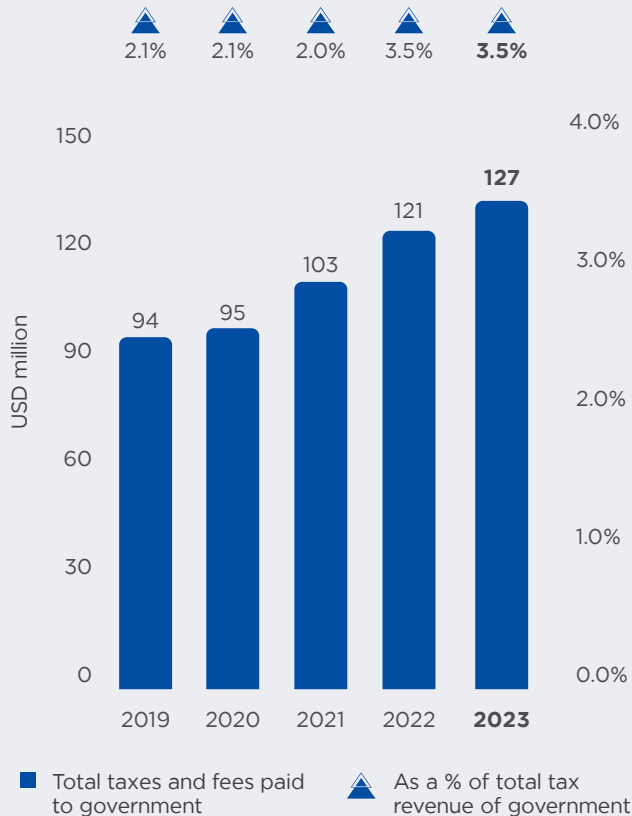
Smart directly **provided 1,113 jobs** in 2023. Cambodian citizens accounted for **97.9% of total employees** of the firm. Around **36% of Smart employees were women**.

Smart's operations indirectly supported **an additional 30,544 jobs** and a further **16,836 jobs** were supported by Smart's capital investments. (Figure 5)

Smart's Labour Productivity

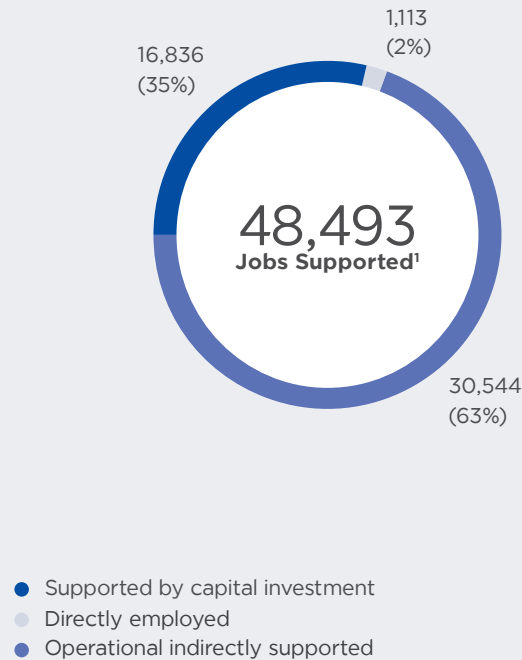
Smart's productivity, measured as Gross Value Added (GVA) per employee, **increased from 2019 to 2021** but fell back to 2019 levels in 2023 due to sharp expansion of Smart's workforce. (Figure 6)

Figure 4: Total taxes and fees paid to public finance 2019-2023



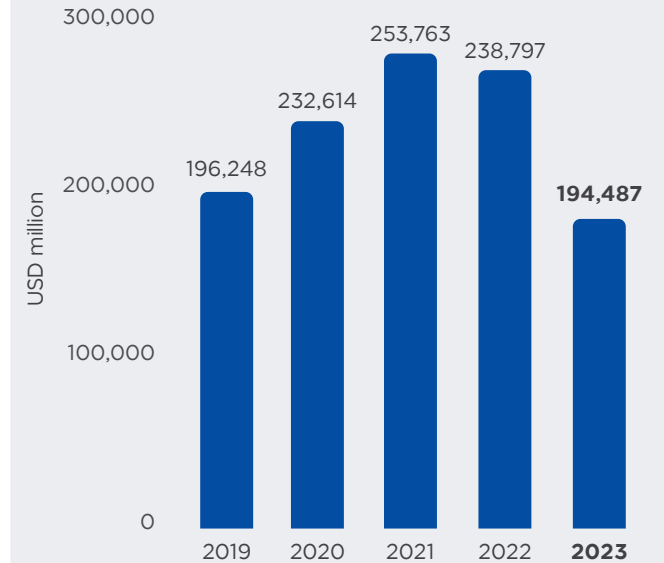
Source: Axiata and KPMG analysis

Figure 5: Total employment impact 2023



Notes: ¹ Totals may not add up due to rounding
Source: KPMG analysis.

Figure 6: Smart's labour productivity 2019-2023



Source: KPMG analysis

NATIONAL CONTRIBUTION REPORT

EDOTCO



Figures presented in this section exclude contributions from EDOTCO Malaysia, except for 2019 where they are still included. This is to avoid double counting as contributions from EDOTCO Malaysia are taken into account in the 'Malaysia's Digital Ecosystem' section. Figures also exclude EDOTCO Myanmar for 2023.



[IAR](#), Our Triple Core Business, EDOTCO Axiata Review on pages 70 to 71

As a TowerCo, EDOTCO has sought to provide best-in-class, sophisticated digital infrastructure for its customers through investments and an emphasis on innovation.

Digitisation and Innovation

Through innovation and upgrades to the infrastructure that they provide, EDOTCO will be able to achieve cost savings for their customers and consumers, as well as reduce their carbon footprint, creating a sustainable yet valuable business.

In 2023, EDOTCO signed a Memorandum of Understanding for the Bamboo R&D project to create a sustainable telco tower using bamboo. The implementation of the tubular tower has achieved energy savings of 8.8%, which accounts for up to 31% of the total GF tower rollout.

[SNCR](#), Digitisation & Innovation on page 49

Contribution to Gross Value Added (GVA)

USD696 million

Operational Direct GVA
USD247 million

Operational Indirect and Induced GVA: **USD196 million**

Capital Investment GVA
USD253 million

- EDOTCO's total Gross Value Added (GVA) contribution across the seven economies it operates in reached **USD696 million**
- EDOTCO's operations directly and indirectly contributed **USD443 million**, accounting for **64%** of total GVA contribution
- Capital investments contributed **USD253 million** with a share of **36%** of total GVA

Direct Employees 561

Female
11.1%

- **561 staff** were directly employed by EDOTCO in 2023
- **11.1% of total employees** were women

Total Jobs Supported 61,454

Directly Employed 561	Operational Indirectly supported 26,605	Supported by Capital Investment 32,843
---------------------------------	---	--

- Overall, EDOTCO supported **61,454 jobs** in 2023 through its operations and capital investments
- EDOTCO's operations directly and indirectly supported **27,166 jobs**
- EDOTCO's capital investment supported **34,287 jobs**

Capital + Operational Expenditure USD332 million¹

Capital Expenditure USD256 million	Operational Expenditure USD76 million	Every USD1 Spent on capex	Translated to USD2.7 GVA Contribution
--	---	----------------------------------	--

- EDOTCO's total Capital and Operational Expenditure reached **USD332 million** in 2023, with Capital Expenditure recorded at **USD256 million** (77%) and Operational Expenditure at **USD76 million** (23%)
- EDOTCO added **USD2.7 GVA** to the economies it operates in for every USD1 spent through its capital investment in 2023

Contribution to Public Finance USD90 million

(**0.02%** of total tax revenue of the governments of countries it operates in)

- EDOTCO contributed **USD90 million** in total taxes and fees to government, accounting for **0.02%** of total tax revenue of the governments in countries it operates in²

Note: ¹ Capital expenditure and operational expenditure data provided by Axiata in MYR, then converted to USD
² Total tax revenue of government is estimated at USD373 billion, and is the sum of tax revenue of government across all seven countries where EDOTCO operates other than Malaysia and Myanmar. Where available, tax revenue of government estimates are obtained from national agencies. Estimates are otherwise obtained from IMF WEO

NATIONAL CONTRIBUTION REPORT

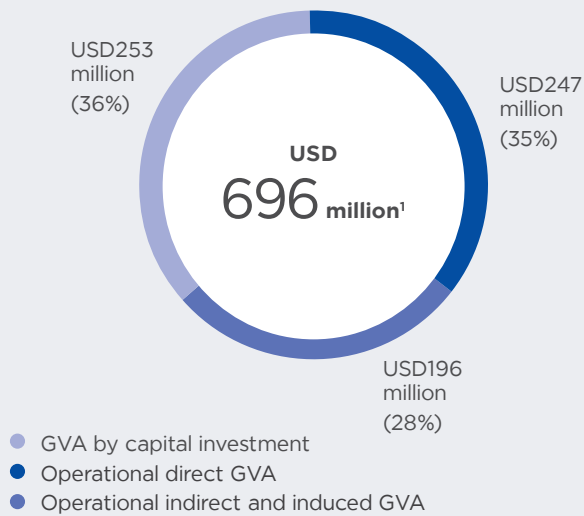
EDOTCO's Total Economic Contribution

EDOTCO's substantial operations and investments contributed significantly to the economic growth in countries it operates in. **With a total operating expenditure of USD26 million and capital investment of USD256 million**, EDOTCO contributed **USD696 million** to the economies.

EDOTCO's operations **directly contributed USD247 million**, accounting for **35% of total GVA** contribution. Another **USD196 million was** indirectly generated through the expenditures by EDOTCO's suppliers. **For every USD1 EDOTCO directly** added to the economies, **it generated another USD0.8 indirectly** from local suppliers.

Capital investment contributed a further **USD253 million**, representing a share of **36%** of the total GVA. (Figure 1)

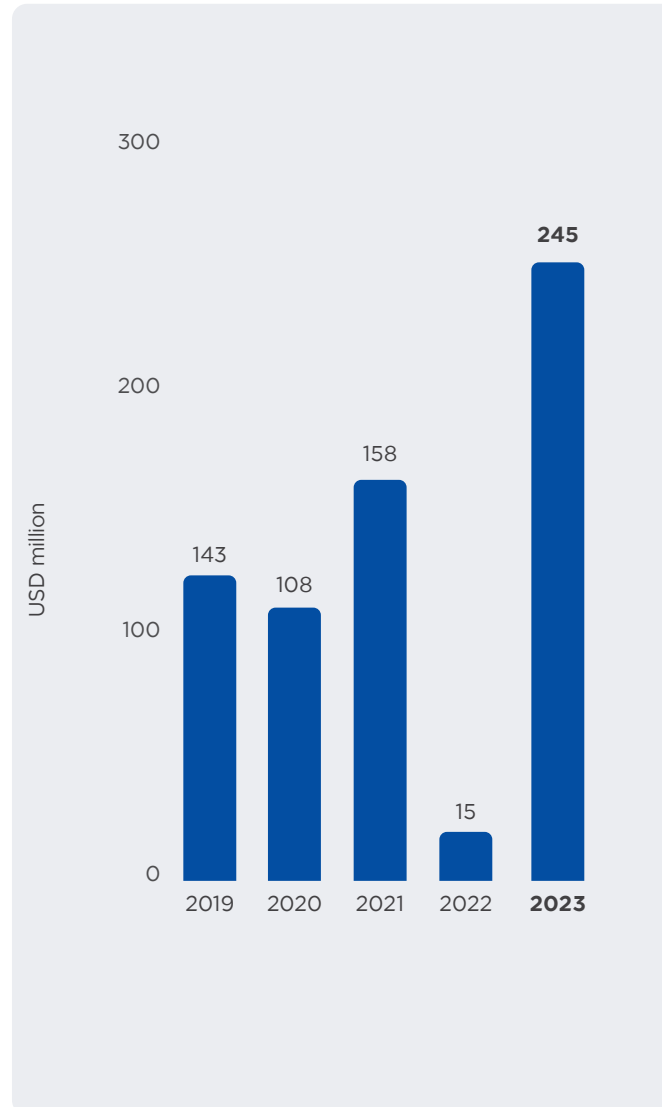
Figure 1: GVA Contribution to the Economies in 2023



Notes: ¹ Totals may not add up due to rounding
Source: KPMG analysis

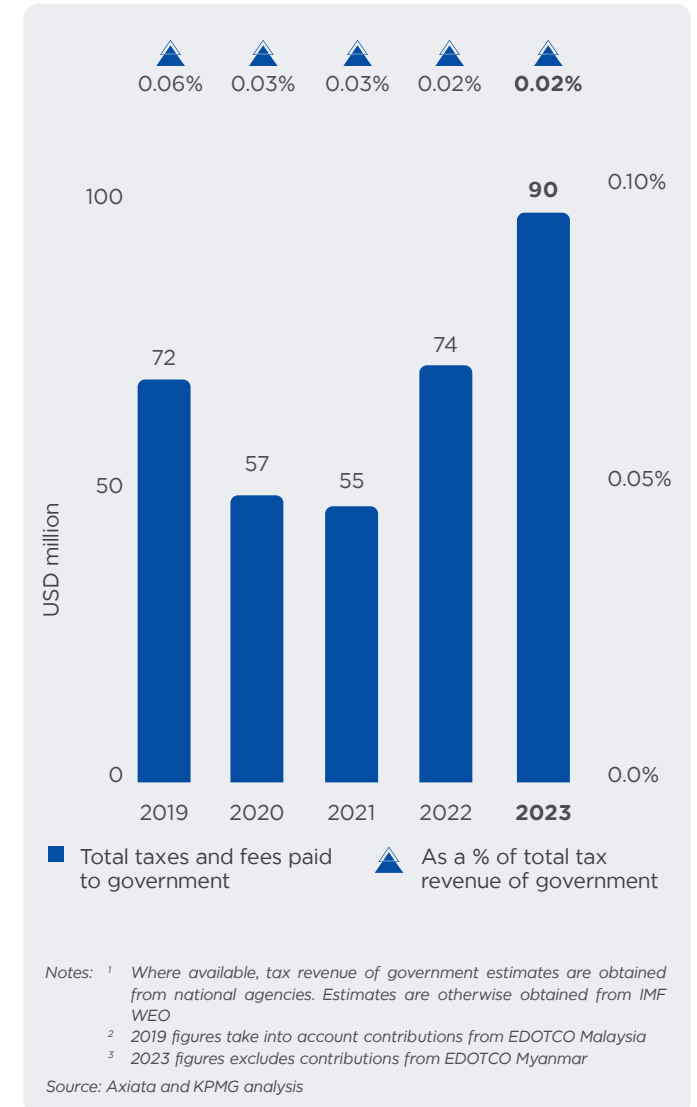
Investing and Innovating for The Long Term

EDOTCO's capital investment was **USD256 million in 2023**. Capital investment plays an important role in facilitating long-term sustainable development of EDOTCO's business and contributing to the growth of the economies it operates in.



Contributions to Public Finance

Annual taxes and fees paid in 2023 was **USD90 million, accounting for 0.02%** of total tax revenue of the government of economies EDOTCO operates in.



Notes: ¹ Where available, tax revenue of government estimates are obtained from national agencies. Estimates are otherwise obtained from IMF WEO
² 2019 figures take into account contributions from EDOTCO Malaysia
³ 2023 figures excludes contributions from EDOTCO Myanmar

Source: Axiata and KPMG analysis

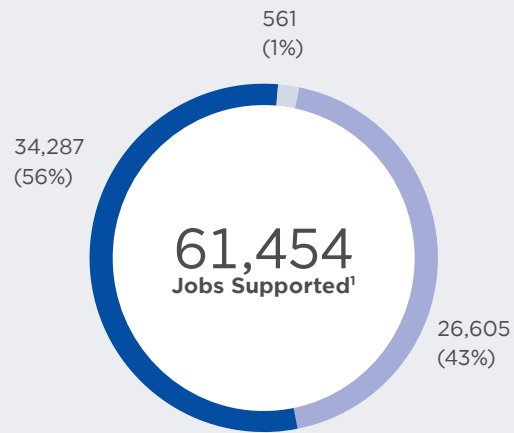
NATIONAL CONTRIBUTION REPORT

Total Employment Impact

561 jobs were directly provided by EDOTCO's operations in 2023. 11.1% of EDOTCO's employees were women.

EDOTCO's operations also indirectly supported **26,605 jobs**. A further **34,287 jobs were supported** by its capital investment. (Figure 5)

Figure 5: Total employment impact 2023



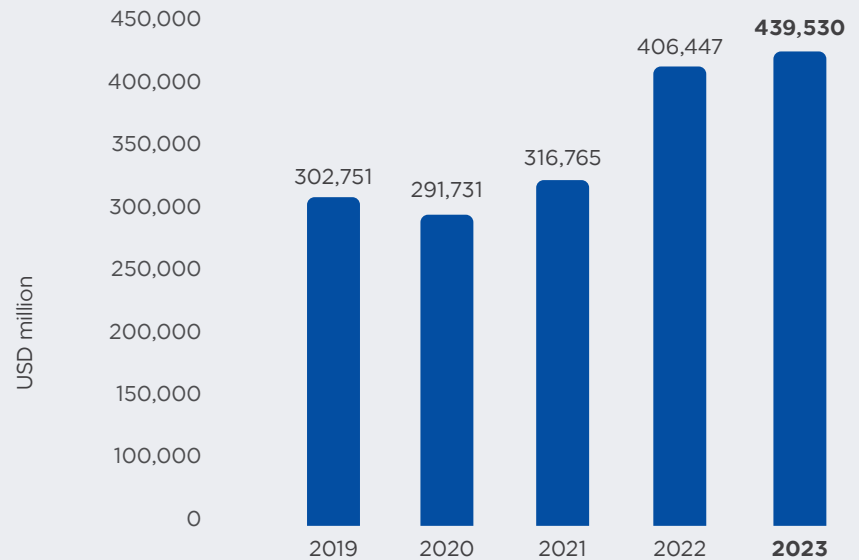
- Supported by capital investment
- Directly employed
- Operational indirectly supported

Notes: ¹ Totals may not add up due to rounding
Source: KPMG analysis

Smart's Labour Productivity

EDOTCO's productivity, measured as Gross Value Added (GVA) per employee was **USD439,530** in **2023**. Labour productivity has been growing over 2019-2023, at a CAGR of 9.8%.

EDOTCO's labour productivity 2019-2023



Notes: ¹ 2019 figures take into account contributions from EDOTCO Malaysia
² 2023 figures excludes contributions from EDOTCO Myanmar
Source: KPMG analysis

NCR METHODOLOGY

1. Methodologies and Computational Formula

Direct Value Added contributions were estimated based on operational data provided by Axiata regarding operating revenues, operating expenditures, compensation of employees, and indirect taxes and levies.

Total Value Added contributions were estimated using an economic multiplier. The total multipliers (Type II) for the Telecomm industry were derived from national Input-Output (-O) tables published by OECD, ADB, and national statistical agencies.

Employment is generated through a number of avenues including:

- i. Directly through Axiata and related industries.
- ii. Outsourced support services (if any) including customer support and network operations and maintenance.
- iii. Indirectly through firms that provide services to Axiata's operations.
- iv. Induced as employees from the above spend their household income there by generating further rounds of employment.

Total employment impact is estimated using I-O tables and Average Value Added per Worker derived from relevant Departments of Statistics for each country.

2. Capital Investment

- i. Total Value Added = Capital Expenditure in Host Country x Average Value Added Multiplier
- ii. **(a) For countries where employment multipliers are available:**
Total Employment in Host Country = Total Capital Expenditure in Host Country x Average Employment Multiplier
- (b) For countries where employment multipliers are not available:**
Total Employment in Host Country = Total Capital Expenditure Value Added in Host Country / Average Value Added per Worker in Host Country

3. Operational

- i. Total Value Added = Direct Value Added x Total Value Added Multiplier where:

Direct Value Added = Operating Revenue - Operating Expenditure + Compensation of Employees + Indirect Taxes and Levies

Note: Operating expenditure provided by Axiata excludes depreciation

- ii. **(a) For countries where employment multipliers are available:**
Total Employment = Total Operational Expenditure x Average Employment Multiplier
- (b) For countries where employment multipliers are not available:**
Total Employment = (Total Indirect Value Added / Average Value Added per Worker in Host Country) + (Direct Employment as per Axiata data)
- iii. Axiata's labour productivity = Direct Value Added / Number of Employees

Note: Number of Employees include both direct and outsourced employees if any.

4. Productivity Analysis

Axiata Contribution to GDP Growth = National Contribution to GDP Growth x Market Share of Axiata where:

National Contribution to GDP Growth = National Penetration Growth x Growth Factor

Our methodology until FY2021 for National Penetration was = Total Number of Subscribers/Population

For FY2022, we updated the methodology to split the productivity analysis into a mobile ownership effect and an upgrade effect (allowing us to assess the impact of 3G and 4G connectivity growth). 5G and IoT connections were less than 10% penetration and therefore were not assessed due to a lack of theoretical network effect.

Note: Until 2021, Growth factor was assumed to be 1.2% per 10% change in market penetration for all countries. For 2022, we assumed Growth factor to be 0.5% per 10% change in connections, 0.07% per 10% change in 3G connections and 0.05% per 10% change in 4G connections

5. Multiplier Analysis

Capex Multiplier = Total Axiata's Value Added Contribution / Capital Expenditure

Note: Total Axiata's Value Added contribution includes Operational Direct Value Added, Operational Indirect and Induced Value Added, Value Added by Capital Investment, and Value Added by Productivity Impact

6. Future Revision of Economic Contributions Estimate

Economic contributions estimated in the latest year may be revised in future. This is largely due to a revision of the underlying economic data such as number of mobile subscribers in the country, GDP growth, population, mobile penetration growth rate, etc. For example, in 2019, the economic data available for the year 2019 is usually a preliminary estimate. In 2020, that 2019 estimate may be revised or superseded by actual figures.

7. Exchange Rate

Exchange rates used in this analysis are derived by taking the average of exchange rates at the start of each month in the financial year (i.e. 1st Jan - 1st Dec). This approach is designed to capture the average exchange rate across the entire year, which is when the economic activities of Axiata that are being analysed take place.

APPENDICES



▶ **List of Abbreviations - page 127**

▶ **Bursa Data Performance Table
- page 129**

▶ **GRI Content Index - page 133**

▶ **TCFD Index - page 136**

▶ **UNGC Principles Index - page 137**

▶ **Independent Limited Assurance Report
by PricewaterhouseCoopers PLT,
Malaysia
- page 138**

LIST OF ABBREVIATIONS

Amazon Web Services (AWS)	CEO Action Network (CAN)	Gigabyte (GB)
Annual General Meetings (AGM)	Child Sexual Abuse Material (CSAM)	Gigajoules (GJ)
Anti-Bribery & Anti-Corruption (ABAC)	Civil Society Organisations (CSO)	Global Reporting Initiative (GRI)
Application Programming Interface (API)	Cloud Native Computing Foundation (CNCF)	Global System for Mobile Communications (GSM)
Artificial Intelligence (AI)	Communication on Progress (CoP)	Global System for Mobile Communications Association (GSMA)
Asia Pacific (APAC)	Continuous Integration and Continuous Deployment (CI/CD)	Governance & Audited Financial Statements (GAFS)
Association of Southeast Asian Nations (ASEAN)	Corporate Social Responsibility (CSR)	Government Information Center (GIC)
Atmospheric Water Generation (AWG)	Corporate Sustainability Assessment (CSA)	Greenhouse Gas (GHG)
Axiata Digital Innovation Fund (ADIF)	Customer Experience (CX)	Gross Domestic Product (GDP)
Axiata Digital Labs (ADL)	Customer Interaction Centre (CIC)	Gross Value Added (GVA)
Axiata Enterprise Investment Board (AEIB)	Data Over Cable Service Interface Specification (DOCSIS)	High Risk Transaction (HRT)
Axiata Equity-in-Education Fund (AEIEF)	Dialog Axiata Digital Innovation Fund (DADIF)	High Speed Packet Access (HSPA)
Axiata Fast Forward (AFF)	Dialog Innovation Challenge (DIC)	Hybrid Fibre Coaxial (HFC)
Axiata Foundation (AF)	Digital Assistant (DIA)	Institute for Energy Economics and Financial Analysis (IEEFA)
Axiata Group Analytics (AGA)	Digital Inclusion Benchmark (DIB)	Industrial Revolution 4.0 (IR 4.0)
Axiata Regulatory Compliance Framework (ARCF)	Digital Learning Programme (DLP)	Information Security Management System (ISMS)
Axiata Young Talent Programme (AYTP)	Digital Trust & Resilience (DT&R)	Information technology (IT)
AxiataCares Volunteers (ACV)	Diversity, Equity and Inclusion (DEI)	Intergovernmental Panel on Climate Change (IPCC)
Base Transceiver Stations (BTS)	Earnings Before Interest, Taxes, Depreciation and Amortisation (EBITDA)	International Commission on Non-Ionising Radiation Protection (ICNIRP)
Basic Education Equivalency Programme (BEEP)	Economic, Environmental, Social and Governance (EESG)	International Energy Agency (IEA)
Beyond Value Chain Mitigation (BVCM)	Employee Engagement Survey (EES)	International Labour Organization (ILO)
Board Audit Committee (BAC)	Enterprise Risk Management (ERM)	International Standard on Assurance Engagements (ISAE)
Board Nomination and Remuneration Committee (BNRC)	Environmental, Safety and Health (ESH)	International Sustainability Standards Board (ISSB)
Board Risk and Compliance Committee (BRCC)	Environmental, Social and Governance (ESG)	Internet of Things (IoT)
Board Sustainability Committee (BSC)	Fibre to the Home (FTTH)	Internet Watch Foundation (IWF)
Business Continuity Management (BCM)	Fibre to the x (FTTx)	Key performance indicators (KPIs)
Business Continuity Plans (BCP)	Fibre InfraCo (FibreCo)	Kilowatt (kW)
Business Impact Analysis (BIA)	Financial Yang Ideal (FYI)	
Buy Now Pay Later (BNPL)	Fixed Mobile Convergence (FMC)	
Cable Modern Termination System (CMTS)	Fixed Wireless Broadband (FWBB)	
Capability Maturity Model Integration (CMMI)	General Packet Radio Service (GPRS)	
Capital Expenditure (CAPEX)	Gifts, Donations, Sponsorship Committee (GDSC)	
Carbon Disclosure Project (CDP)		



LIST OF ABBREVIATIONS

Kolej Yayasan Saad (KYS)	Radio Access Network (RAN)	United Nations Women’s Empowerment Principles (UN WEP)
Long Term Evolution (LTE)	Research and Development (R&D)	University Leadership Development Programme (ULDP)
Lost Time Incident Frequency Rate (LTIFR)	Risk Compliance and Management Committee (RCMC)	User Interface (UI)
Machine Learning (ML)	Science Based Targets initiative (SBTi)	Voice over LTE (VoLTE)
Majlis Amanah Rakyat (MARA)	Short Messaging System (SMS)	Voice over WiFi (VoWiFi)
Maktab Rendah Sains Mara (MRSM)	Small and Medium Enterprises (SME)	Wireless Fidelity (WiFi)
Malaysia Anti-Corruption Commission (MACC)	Social & Emotional Learning Programme (SELP)	Women of Axiata and Male Allies (WAMA)
Malaysian Communications and Multimedia Commission (MCMC)	Social Security Contribution Levy (SSCL)	XL Future Leaders (XLFL)
Malaysian Nature Society (MNS)	South Asian Telecommunication Regulators’ Council (SATRC)	Young CEO Development Programme (YCDP)
Malaysian Relief Agency (MRA)	Standard Operating Procedure (SOP)	Young Executive’s Sustainability Summit (YESS)
Memorandum of Understanding (MoU)	Supplier Code of Conduct (SCOC)	
Ministry of Post and Telecommunications (MPTC)	Sustainability & National Contribution Report (SNCR)	
Multiprotocol Label Switching (MPLS)	Task Force on Climate-related Financial Disclosures (TCFD)	
National Committee for Disaster Management (NCDM)	Technical and Vocational Education And Training (TVET)	
National Institute of Standards and Technology (NIST)	Telecommunication Company (Telco)	
National Tower Companies (NTC)	Tower Company (TowerCo)	
Net Promoter Score (NPS)	Transparent, Rights, Use, Security and Transfer (T.R.U.S.T)	
Network for Greening the Financial System (NGFS)	UN Global Compact Network Malaysia & Brunei (UNGCMYB)	
Occupational Health and Safety (OHS)	United Nations (UN)	
OpCo Accelerated Development Programme (OADP)	United Nations Educational, Scientific and Cultural Organisation (UNESCO)	
Open Digital Architecture (ODA)	United Nations Global Compact (UNGC)	
Operating Companies (OpCos)	United Nations Sustainable Development Goals (UN SDGs)	
Operating Expenditure (OPEX)		



BURSA DATA PERFORMANCE TABLE (FROM ESG REPORTING PLATFORM)

Indicator	Measurement Unit	2023
Bursa (Anti-corruption)		
Bursa C1(a) Percentage of employees who have received training on anti-corruption by employee category		
Senior Management	Percentage	79.15
Middle Management	Percentage	100.00
Executives	Percentage	93.31
Non-executives	Percentage	94.50
Bursa C1(b) Percentage of operations assessed for corruption-related risks	Percentage	100.00
Bursa C1(c) Confirmed incidents of corruption and action taken	Number	0
Bursa (Community/Society)		
Bursa C2(a) Total amount invested in the community where the target beneficiaries are external to the listed issuer	MYR	26,780,000.00
Bursa C2(b) Total number of beneficiaries of the investment in communities	Number	28,465,992
Bursa (Diversity)		
Bursa C3(a) Percentage of employees by gender and age group, for each employee category		
Age Group by Employee Category		
Senior Management Under 30	Percentage	0.30
Senior Management Between 30-50	Percentage	67.98
Senior Management Above 50	Percentage	31.72
Middle Management Under 30	Percentage	6.74
Middle Management Between 30-50	Percentage	85.76
Middle Management Above 50	Percentage	7.46
Executive Under 30	Percentage	38.42
Executive Between 30-50	Percentage	58.02
Executive Above 50	Percentage	2.56

Internal assurance

External assurance

No assurance

(*) Restated



BURSA DATA PERFORMANCE TABLE (FROM ESG REPORTING PLATFORM)

Indicator	Measurement Unit	2023
Non-executive Under 30	Percentage	40.95
Non-executive Between 30-50	Percentage	56.19
Non-executive Above 50	Percentage	2.86
Gender Group by Employee Category		
Senior Management Male	Percentage	89.18
Senior Management Female	Percentage	30.82
Middle Management Male	Percentage	74.20
Middle Management Female	Percentage	25.80
Executive Male	Percentage	56.48
Executive Female	Percentage	33.52
Non-executive Male	Percentage	73.76
Non-executive Female	Percentage	26.24
Bursa C3(b) Percentage of directors by gender and age group		
Male	Percentage	76.83
Female	Percentage	23.17
Under 30	Percentage	0.00
Between 30-50	Percentage	29.27
Above 50	Percentage	70.73
Bursa (Energy management)		
Bursa C4(a) Total energy consumption	Megawatt	1,718,664.25
Bursa (Health and safety)		
Bursa C5(a) Number of work-related fatalities	Number	0
Bursa C5(b) Lost time incident rate ("LTIR")	Rate	0.04

Internal assurance

External assurance

No assurance

(*) Restated



BURSA DATA PERFORMANCE TABLE (FROM ESG REPORTING PLATFORM)

Indicator	Measurement Unit	2023
Bursa C5(c) Number of employees trained on health and safety standards	Number	5,906
Bursa (Labour practices and standards)		
Bursa C6(a) Total hours of training by employee category		
Senior Management	Hours	9,685
Middle Management	Hours	64,044
Executive	Hours	156,560
Non-executive	Hours	8,298
Bursa C6(b) Percentage of employees that are contractors or temporary staff	Percentage	13.09
Bursa C6(c) Total number of employee turnover by employee category		
Senior Management	Number	69
Middle Management	Number	581
Executive	Number	1,091
Non-executive	Number	346
Bursa C6(d) Number of substantiated complaints concerning human rights violations	Number	0
Bursa (Supply chain management)		
Bursa C7(a) Proportion of spending on local suppliers	Percentage	69.49
Bursa (Data privacy and security)		
Bursa C8(a) Number of substantiated complaints concerning breaches of customer privacy and losses of customer data	Number	0
Bursa (Water)		
Bursa C9(a) Total volume of water used	Megalitres	501,650,892
Bursa (Emissions management)		
Bursa C11(a) Scope 1 emissions in tonnes of CO2e	Metric tonnes	26,767.76
Bursa C11(b) Scope 2 emissions in tonnes of CO2e	Metric tonnes	1,094,612.60

Internal assurance

External assurance

No assurance

(*) Restated



BURSA DATA PERFORMANCE TABLE (FROM ESG REPORTING PLATFORM)

Footnotes and Additional Comments for Bursa ESG Common Indicators Table

Bursa C1(a)	<ul style="list-style-type: none"> The percentage of employees receiving anti-corruption training includes employees who has resigned
Bursa C2(b)	<ul style="list-style-type: none"> Total number of beneficiaries includes both direct and indirect beneficiaries
Bursa C5(b)	<ul style="list-style-type: none"> Lost time incident rate (“LTIR”) excludes Digital Businesses (ADA, Boost, and ADL) and Corporate Center
Bursa C6(a)	<ul style="list-style-type: none"> Training includes all types of vocational training and instruction paid educational leave provided by a company for its employees, training or education pursued externally and paid for in whole or in part by a company and training on specific topics. Training does not include on-site coaching by supervisors An employee is defined as an individual who is in an employment relationship with the company, according to national law or its application Employee category, refers to the breakdown of employees by level (such as senior management, middle management) and function (such as technical, administrative, production)
Bursa C7(a)	<ul style="list-style-type: none"> In calculating the proportion of spending on local supplies the total amount of spending is based on the total value of invoices for purchase of goods or services during the reporting period Local suppliers refer to companies or persons that provide products or services to the reporting company, and that are based in the same geographic market as the reporting company (that is, no transnational payments are made to a local supplier) The geographic definition of ‘local’ can include the community surrounding operations, a region within a country or a country
Bursa C9(a)	<ul style="list-style-type: none"> Total volume of water captures water usage in offices and excludes Digital Businesses (ADA, Boost, and ADL) and Corporate Center
Bursa C4(a)	<ul style="list-style-type: none"> Total energy consumed excludes non-renewable energy sources defined as energy sources that cannot be replenished, reproduced, grown, or generated in a short period through ecological cycles or agricultural processes
Bursa C11(a) Bursa C11(b)	<ul style="list-style-type: none"> The Scope 1 and Scope 2 emissions of Axiata are reported based on the GHG Protocol’s Corporate Accounting and Reporting Standard issued by the World Resource Institute and World Business Council for Sustainable Development Axiata applies the operational control approach in accounting for emissions from those sources over which Axiata has full authority to introduce and implement its operating policies, which includes Axiata and its subsidiaries. Axiata’s reporting boundary excludes the digital businesses i.e. Boost, ADA and ADL which are immaterial to the Axiata Group Berhad’s overall GHG emissions Scope 1 & 2 emissions reported here exclude Digital Businesses and may change in the future subject to SBTi validation update The 2022 Scope 1 & 2 emission had been restated due to the changes in emission factors to reflect the latest 2022 IEA emission factors and organisational boundary due to merger of CelcomDigi and divestment of Ncell. Historical carbon emission data prior to 2022 based on previous methodologies are available in our previous SNCRs

GRI CONTENT INDEX

Axiata Group Berhad has reported the information cited in this GRI content index for the period 1 January 2023 to 31 December 2023 with reference to the GRI Standards.

GRI 1 USED: GRI 1: FOUNDATION 2021

Applicable GRI Sector Standard: Not applicable

Disclosure	GRI Disclosure Description	Location	Omissions
GRI 2: GENERAL DISCLOSURES 2021			
The organisation and its reporting practices			
2-1	Organisational details	Pg. 4	
2-2	Entities included in the organisation's sustainability reporting	Pg. 2	
2-3	Reporting period, frequency and contact point	Pg. 2-3	
2-4	Restatements of information	Pg. 61	
2-5	External assurance	Pg. 138-139	
Activities and workers			
2-6	Activities, value chain and other business relationships	Pg. 2, 4, 26-27, 102-103	
2-7	Employees	Pg. 70, 72	
Governance			
2-9	Governance structure and composition	IAR, Pg. 83-90 Board Charter	
2-10	Nomination and selection of the highest governance body	IAR, Pg. 88	
2-11	Chair of the highest governance body	Tan Sri Shahril Ridza Ridzuan	
2-12	Role of the highest governance body in overseeing the management of impacts	Pg. 14-15, IAR, Pg. 88, 90, 99 Terms of Reference of Board Sustainability	
2-13	Delegation of responsibility for managing impacts	Pg. 15, IAR, Pg. 90 & 99	
2-14	Role of the highest governance body in sustainability reporting	Pg. 14-15, IAR, Pg. 90 & 99	
2-15	Conflicts of interest	IAR, Pg. 82	
2-16	Communication of critical concerns	Pg. 98, 103	
2-17	Collective knowledge of the highest governance body	IAR, Pg. 92-93, GAFS, Pg. 11-13	
2-18	Evaluation of the performance of the highest governance body	IAR, Pg. 91	
2-19	Remuneration policies	IAR, Pg. 93, 96	
2-20	Process to determine remuneration	IAR, Pg. 93	
Strategy, policies and practices			
2-22	Statement on sustainable development strategy	Pg. 6-8	
2-23	Policy commitments	Pg. 75, 94-99, 102	
2-24	Embedding policy commitments	Pg. 12, 15, 102-103, IAR, Pg. 90 & 99, GAFS, Pg. 32-36	
2-25	Processes to remediate negative impacts	Pg. 98, Whistleblowing policy	

Disclosure	GRI Disclosure Description	Location	Omissions
2-26	Mechanisms for seeking advice and raising concerns	Pg. 98, 103	
2-27	Compliance with laws and regulations	Pg. 96-97	
2-28	Membership associations	Pg. 22	
Stakeholder engagement			
2-29	Approach to stakeholder engagement	Pg. 20-21	
GRI 3: Material Topics 2021			
3-1	Process to determine material topics	Pg. 16	
3-2	List of material topics	Pg. 17-19	
Standard Disclosures			
Advancing Digital Societies			
Material Matter: Sustainable Business Growth			
GRI 3: Material Topics 2021			
3-3	Management approach	Pg. 29	
GRI 201: Economic Performance 2016			
201-1	Direct economic value generated and distributed	Pg. 30, 106-124	
Material Matter: Network Quality & Connectivity			
GRI 3: Material Topics 2021			
3-3	Management approach	Pg. 31	
Material Matter: Customer Experience			
GRI 3: Material Topics 2021			
3-3	Management approach	Pg. 36	
Material Matter: Digital Inclusion			
GRI 3: Material Topics 2021			
3-3	Management approach	Pg. 39	
GRI 203: Indirect Economic Impacts 2016			
203-1	Infrastructure investments and services supported	Pg. 39-48	

GRI CONTENT INDEX

Disclosure	GRI Disclosure Description	Location	Omissions
Advancing Digital Societies			
203-2	Significant indirect economic impacts	Pg. 39-48	
Material Matter: Digitisation & Innovation			
GRI 3: Material Topics 2021			
3-3	Management approach	Pg. 49	
GRI 203: Indirect Economic Impacts 2016			
203-1	Infrastructure investments and services supported	Pg. 49-53	
203-2	Significant indirect economic impacts	Pg. 49-53	
Advancing Green Economy			
Material Matter: Climate Change			
GRI 3: Material Topics 2021			
3-3	Management approach	Pg. 55	
GRI 201: Economic Performance 2016			
201-2	Financial implications and other risks and opportunities due to climate change	Pg. 55-61	
GRI 302: Energy 2016			
302-1	Energy consumption within the organisation	Pg. 62	
GRI 305: Emissions 2016			
305-1	Direct (Scope 1) GHG emissions	Pg. 61	
305-2	Energy indirect (Scope 2) GHG emissions	Pg. 61	
305-4	GHG emissions intensity	Pg. 62	
305-5	Reduction of GHG emissions	Pg. 61	
Material Matter: Environmental Management			
GRI 3: Material Topics 2021			
3-3	Management approach	Pg. 64	
GRI 303: Water and Effluents 2018			
303-3	Water withdrawal	Pg. 65, 131	
GRI 306: Waste 2020			
306-4	Waste diverted from disposal	Pg. 65	

Disclosure	GRI Disclosure Description	Location	Omissions
Advancing Our People & Communities			
Material Matter: Fair, Diverse & Inclusive Employment			
GRI 3: Material Topics 2021			
3-3	Management approach	Pg. 67	
GRI 401: Employment 2016			
401-1	New employee hires and employee turnover	Pg. 131	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Pg. 67	
401-3	Parental Leave	Pg. 67	
GRI 405: Diversity and Equal Opportunity 2016			
405-1	Diversity of governance bodies and employees	Pg. 70, 129-130	
GRI 406: Non-Discrimination 2016			
406-1	Incidents of discrimination and corrective actions taken	Pg. 131	
Material Matter: Talent Development & Attraction			
3-3	Management approach	Pg. 71	
GRI 404: Training and Education 2016			
404-2	Programmes for upgrading employee skills and transition assistance programmes	Pg. 73-74	
404-3	Percentage of employees receiving regular performance and career development reviews	Pg. 71	
Material Matter: Employee Health, Safety & Wellbeing			
3-3	Management approach	Pg. 75	
GRI 403: Occupational Health and Safety 2018			
403-1	Occupational health and safety management safety	Pg. 75	
403-4	Worker participation, consultation and communication on occupational health and safety	Pg. 75	
403-5	Worker training on occupational health and safety	Pg. 76-77	
403-6	Promotion of worker health	Pg. 77	
403-9	Work-related injuries	Pg. 75, 130	
Material Matter: Community Development			
3-3	Management approach	Pg. 78	
GRI 413: Local Communities 2016			
413-1	Operations with local community engagement, impact assessments and development programmes	Pg. 78, 129	

GRI CONTENT INDEX

Disclosure	GRI Disclosure Description	Location	Omissions
Advancing Our People & Communities			
Material Matter: Emergency & Disaster Response			
3-3	Management approach	Pg. 85	
GRI 203: Indirect Economic Impacts 2016			
203-1	Infrastructure investments and services supported	Pg. 86-88	
Advancing Our People & Communities			
Material Matter: Digital Integrity			
GRI 3: Material Topics 2021			
3-3	Management approach	Pg. 90	
GRI 418: Customer Privacy 2016			
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Pg. 93	
Material Matter: Business Ethics & Governance			
GRI 3: Material Topics 2021			
3-3	Management approach	Pg. 94	

Disclosure	GRI Disclosure Description	Location	Omissions
Advancing Our People & Communities			
GRI 205: Anti-Corruption 2016			
205-1	Operations assessed for risks related to corruption	Pg. 97	
205-2	Communication and training about anti-corruption policies and procedures	Pg. 97	
205-3	Confirmed incidents of corruption and action taken	Pg. 97	
GRI 207: Tax 2019			
207-1	Approach to Tax	Pg. 99	
207-2	Tax governance, control and risk management	Pg. 99	
207-3	Stakeholder engagement and management of concerns related to tax	Pg. 99	
207-4	Country-by-country reporting	Pg. 109-124	
Material Matter: Regulatory & Political Risk			
GRI 3: Material Topics 2021			
3-3	Management approach	Pg. 100	
Material Matter: Sustainable Supply Chain			
GRI 3: Material Topics 2021			
3-3	Management approach	Pg. 102	
GRI 204: Procurement Practices 2016			
204-1	Proportion of spending on local suppliers	Pg. 103	

TCFD INDEX

TCFD Recommendations	Section and Page Reference	Remarks
Governance		
<i>Disclose the organisation's governance around climate-related risks and opportunities</i>		
a. Describe the board's oversight of climate-related risks and opportunities	<ul style="list-style-type: none"> • SNCR, Sustainability Governance on pages 14 to 15 • SNCR, Climate Change on pages 57 to 58 	
b. Describe management's role in assessing and managing climate-related risks and opportunities		
Strategy		
<i>Disclose the actual and potential impacts of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning where such information is material</i>		
a. Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term	<ul style="list-style-type: none"> • SNCR, Climate Change on pages 55 to 58 	Partial alignment: Axiata has identified and assessed climate-related risks and opportunities, which will be more comprehensively assessed across the time horizons that will be defined in the future For more information on Axiata's forward-looking plans, please refer to the "Next Steps" under the TCFD: Strategy section on page 58
b. Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning		Partial alignment: Axiata has assessed the climate impacts in a qualitative manner. Moving forward, we will quantify those impacts, and incorporate the outcomes of the assessment into our business, strategy and financial planning For more information on Axiata's forward-looking plans, please refer to the "Next Steps" under the TCFD: Strategy section on page 58
c. Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario		Partial alignment: Axiata has selected the climate scenarios to be adopted, and will be conducting our climate scenario analysis, moving forward For more information on Axiata's forward-looking plans, please refer to the "Next Steps" under the TCFD: Strategy section on page 58
Risk Management		
<i>Disclose how the organisation identifies, assesses, and manages climate-related risks</i>		
a. Describe the organisation's processes for identifying and assessing climate-related risks	<ul style="list-style-type: none"> • SNCR, Climate Change on pages 57, 59 to 60 	Partial alignment: Axiata has defined a clear process for identifying and assessing their climate-related risks, and is working towards integrating this process into our existing ERM framework For more information on Axiata's forward-looking plans, please refer to the "Next Steps" under the TCFD: Risk Management section on page 60
b. Describe the organisation's processes for managing climate-related risks		
c. Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation's overall risk management		
Metrics and Targets		
<i>Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material</i>		
a. Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process	<ul style="list-style-type: none"> • SNCR, Climate Change on pages 55 to 57, 61 to 62 	
b. Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 Greenhouse Gas (GHG) emissions and the related risks		
c. Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets		



UNGC PRINCIPLES INDEX

Principles	Description	Remark
HUMAN RIGHTS		
Principle 1	Businesses should support and respect the protection of internationally proclaimed human rights; and	Axiata Group Berhad Employee Code of Conduct Axiata Supplier Code of Conduct Business Ethics and Governance - Human Rights on page 98 Fair, Diverse & Inclusive Employment on pages 67 to 68 Employee Health, Safety & Wellbeing on page 75 Sustainable Supply Chain on page 102
Principle 2	Make sure that they are not complicit in human right abuses	
LABOUR		
Principle 3	Businesses should uphold the freedom of association and effective recognition of the right to collective bargaining;	Axiata Group Berhad Employee Code of Conduct Axiata Supplier Code of Conduct Business Ethics and Governance - Human Rights on page 98 Fair, Diverse & Inclusive Employment on pages 67 to 68 Sustainable Supply Chain on page 102
Principle 4	The elimination of all forms of forced and compulsory labour;	
Principle 5	The effective abolition of child labour and;	
Principle 6	The elimination of discrimination in respect of employment and occupation	
ENVIRONMENT		
Principle 7	Businesses should support a precautionary approach to environmental challenges;	Axiata Group Berhad Employee Code of Conduct Axiata Supplier Code of Conduct Climate Change on pages 55 to 63 Environmental Management on pages 64 to 65
Principle 8	Undertake initiatives to promote greater environmental responsibility; and	
Principle 9	Encourage the development and diffusion of environmentally friendly technologies	Axiata Net-Zero Carbon Roadmap Climate Change on pages 55 to 63 Environmental Management on pages 64 to 65
ANTI-CORRUPTION		
Principle 10	Businesses should work against corruption in all its forms, including extortion and bribery	Axiata Group Berhad Anti-Bribery and Anti-Corruption Policy Anti-Bribery and Anti-Corruption Policy Statement Anti-Bribery, Anti-Corruption and Anti-Money Laundering Terms & Conditions Axiata Group Berhad Employee Code of Conduct Axiata Supplier Code of Conduct Business Ethics and Governance on pages 94, 96 to 98 Sustainable Supply Chain on pages 102 to 103

INDEPENDENT LIMITED ASSURANCE REPORT



Independent Limited Assurance Report to the Board of Directors of Axiata Group Berhad on the selected sustainability information disclosed in the Sustainability & National Contribution Report 2023

We have been engaged by Axiata Group Berhad (the "Company" or "Axiata") to perform an independent limited assurance engagement on the selected sustainability information for the year ended 31 December 2023 (the "Subject Matter Information") as defined below and marked with the symbol (*) in the Company's Sustainability & National Contribution Report for the year ended 31 December 2023 (the "SNCR 2023").

Our assurance conclusion does not extend to information in respect of earlier periods or to any other information included in the SNCR 2023.

Our Limited Assurance Conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Subject Matter Information has not been prepared, in all material respects, in accordance with the Reporting Criteria referenced in the "Subject Matter Information and Reporting Criteria" section below.

Subject Matter Information and Reporting Criteria

The Subject Matter Information needs to be read and understood together with the Reporting Criteria, which the Company is solely responsible for selecting and applying.

The Subject Matter Information and the Reporting Criteria are set out below:

Subject Matter Information	Measurement Unit	2023	Reporting Criteria
Bursa's prescribed emission indicators ("Common Indicators")			
GHG1: Total hours of training by employee category <ul style="list-style-type: none"> Senior management Middle management Executive Non-executive 	Number of hours	<ul style="list-style-type: none"> 6,686 34,064 105,266 8,289 	The Sustainability Reporting Guide (SRG Edition) issued by Bursa Malaysia Securities Berhad
GHG2: Proportion of spending on local suppliers	Percentage (%) over total spending	66%	
GHG3: Scope 2 emissions	CO2e	28,761.56	
GHG4: Scope 3 emissions	CO2e	1,094,612.50	
Other sustainability information			
GHG5: Total energy consumption (excluding renewable energy)	Gigajoules (GJ/1000kWh)	6.10	Axiata's internal sustainability reporting guidelines and procedures set out in the Company's SNCR 2023
GHG404-2: Percentage of employees receiving regular performance and career development reviews	Percentage (%) over total number of employees	100%	
GHG1002-2: Proportion of senior management hired from the local community	Percentage (%) over total number of senior management	65%	

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Independent Limited Assurance Report to the Board of Directors of Axiata Group Berhad on the selected sustainability information disclosed in the Sustainability & National Contribution Report 2023 (cont'd)

Responsibilities of the Directors and Management

Management of the Company is responsible for the preparation of the Subject Matter Information included in the Company's SNCR 2023 in accordance with the Reporting Criteria.

This responsibility includes the selection and application of appropriate methods to prepare the Subject Matter Information reported in the Company's SNCR 2023 as well as the design, implementation and maintenance of internal control relevant for the preparation of the Subject Matter Information that is free from material misstatement, whether due to fraud or error. Furthermore, the responsibility includes the use of assumptions and estimates for disclosures made by the Company which are reasonable in the circumstances.

Those charged with governance are responsible for overseeing the Company's sustainability reporting process.

Inherent Limitations

The absence of a significant body of established practice on which to draw to evaluate and measure the Subject Matter Information allows for different, but acceptable, measurement basis and can affect comparability between entities and over time. In addition, Greenhouse Gas ("GHG") quantification is subject to inherent uncertainty because of incomplete scientific knowledge used to determine emission factors and the values needed to combine emissions of different gases.

The uncertainties and limitations are laid out in more detail in the Reporting Criteria.

Our Responsibility

Our responsibility is to express a limited assurance conclusion on the Subject Matter Information based on the procedures we have performed and the evidence we have obtained. We conducted our limited assurance engagement in accordance with the approved standard for assurance engagements in Malaysia, ISAE 3000 (Revised) "Assurance Engagements Other Than Audits or Reviews of Historical Financial Information". This standard requires that we plan and perform this engagement under consideration of materiality to express our conclusion with limited assurance about whether the Subject Matter Information is free from material misstatement.

Our Independence and Quality Management

We have complied with the independence and other ethical requirements of the B-Listed (or Professional Ethics, Conduct and Practice) of the Malaysian Institute of Accountants ("MIA") and the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

The firm applies International Standard on Quality Management 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

INDEPENDENT LIMITED ASSURANCE REPORT



Independent Limited Assurance Report to the Board of Directors of Axiata Group Berhad on the selected sustainability information disclosed in the Sustainability & National Contribution Report 2023 (cont'd)

Summary of Work Performed

Our work included the following procedures: We:

- Evaluated the suitability in the circumstances of the Company's Reporting Criteria as the basis for preparing the Subject Matter Information;
- Obtained an understanding of the Company's control environment, processes and systems relevant to the preparation of the Subject Matter Information at the consolidated level and operating unit level. Our procedures did not include evaluating the suitability of design or operating effectiveness of control activities;
- Evaluated the appropriateness of measurement and evaluation methods, reporting policies used and estimates made by the Company, noting that our procedures did not involve testing the data on which the estimates are based or separately developing our own estimates against which to evaluate the Company's estimates;
- Performed review analysis on the Subject Matter Information;
- Performed limited substantive testing on a sampling basis on transactions included in the Subject Matter Information which involved agreeing data points to/from source information to check that the underlying subject matter had been appropriately evaluated or assessed, recorded, collated and reported;
- Assessed the appropriateness of the inclusion/exclusion factors used in the calculation of the Scope 1 and Scope 2 emissions, where relevant;
- Checked mathematical formulas, prices and default values used in the Subject Matter Information against the Company's Reporting Criteria; and
- Evaluated the appropriateness of the disclosure and presentation of the Subject Matter Information based on the Reporting Criteria.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had we performed a reasonable assurance engagement. Accordingly, we do not express a reasonable assurance opinion about whether the Subject Matter Information has been prepared, in all material respects, in accordance with the Reporting Criteria.



Independent Limited Assurance Report to the Board of Directors of Axiata Group Berhad on the selected sustainability information disclosed in the Sustainability & National Contribution Report 2023 (cont'd)

Restriction on Distribution and Use and Disclaimer of Liability to Third Parties and For Any Other Purpose

Our report, including our conclusion, has been prepared solely for the Board of Directors of the Company in accordance with the agreement between us dated 6 March 2024. We consent to the inclusion of this report in the SNCR 2023 which will be accessible from the website of the Company at axiata.ltdinvestor.gov.my in connection with the Company's responsibilities under paragraph 6.2(a) of Practice Note 9 of the Main Market Listing Requirements in respect of the disclosure of a statement as to whether the listed issuer has sought independent assurance on the Subject Matter Information. To the fullest extent permitted by law, we do not accept or assume responsibility or liability to anyone other than the Company for our work or this report except where terms are expressly agreed between us in writing. Any reliance on this report by any third party is solely at its own risk.

PRICEWATERHOUSECOOPERS PTT
 LLP0014401-LCA & AF 1416
 Chartered Accountants

Kuala Lumpur
 28 April 2024

