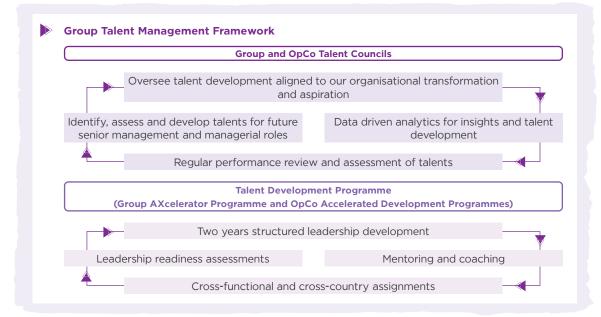
Talent Development

We remain focused on attracting and nurturing the best talents, supporting their career progression and building a talent pool of future leaders for our company and industry. Our talent pool is provided with robust development programmes for each employee level, with talent mapped to a succession profile.

APPROACH

Talent development is guided by our talent management framework which identifies and develops a group talent pipeline within the organisation to serve future leadership needs.



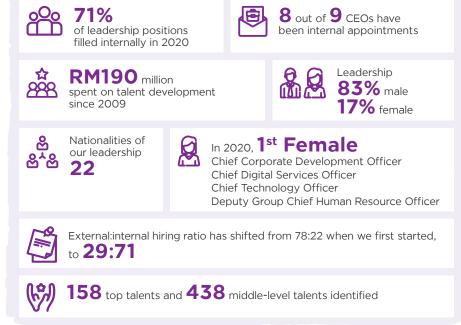
Our Group Talent Management team is tasked with seeking suitable employees who are capable and motivated to embody Axiata's values. Our workforce is then nurtured through robust talent development programmes, continuous employee engagement, attractive performance-based rewards and the provision of a safe and healthy work environment to ensure employee retention. In tandem with rapidly changing customer demand and work processes, our employee development efforts are also geared towards empowering staff to respond to this landscape.

OUTLOOK

Our goal for employee development is the creation of a Modern, Agile and Digital (M.A.D.) culture. This is enabled by digital-based platforms which empower employees to learn and address any competency gaps to achieve career progression.

Truly a Talent Factory

Our investment in human capital development has been translated into the delivery of our ULEP values and our progress towards becoming The Next Generation Digital Champion, allowing Axiata to truly embody a "talent factory". To date, we have recorded the following achievements:



Recognising Exceptional Performance among Our Workforce

As a component of our UI.EP core values, we recognise exceptional performance among our employees. We extend our appreciation to them and recognise that our investments in human capital development are a vital enabler of our sustainability. We continued to conduct our annual Axiata Champions recognition awards for our top performers, amidst the pandemic, by means of a virtual digital ceremony. The awards are held within each OpCo as well as Group-wide, providing an avenue for the company to celebrate exceptional employees for their contributions to the organisation.

Talent Development

Enabling a Modern, Agile and Digital (M.A.D.) Culture

In building a M.A.D. culture among our employees, our investments in employee training and development have increasingly relied on digital online learning platforms. These platforms have made learning accessible for all our employees across the region and include:

- Synapse Internal knowledge management platform to allow sharing by subject matter experts across the Group
 - 2020 monthly averages of 1,066 visits, 31 uploads and 76 downloads

F/STFORW/RD © axiata

- Internal learning platform to curate appropriate learning modules for employees
- **9,913 active users** in 2020
- Online learning in 2020:
 - 7,164 learners activated
 - 228,458 courses viewed
 - 74,598 courses completed
 - Top courses were on IoT, Blockchain, IR4.0

Accelerated Development Programmes

- Identifies individuals Group-wide that have the potential to enter leadership roles across the Group
- Currently, there are 185 talents in the AXcelerator Programme, and 438 talents are part of the OpCo Accelerated Development Programmes

Each OpCo conducts their own training agenda and programmes that are focused on key areas identified for fulfilling their talent development strategy for the year. These are drawn from our M.A.D. culture pillars and other key pillars along the employee life cycle in our organisation.

Environment

During the year, the focus and highlights of training at our Digital Telcos, TowerCo and Digital Businesses were as follows:

edotco

Our Digital Telcos

- Being agile, stress management and mindfulness amidst the pandemic
- Upskilling digital readiness towards analytics and AI

Axiata Digital

- Leadership capabilities for middle management level and above
- Included first cohort of the edotco Talent Accelerated Programme (eTAP) conducted in collaboration with Melbourne Business School
- Virtual and online training modules utilising Groupwide platforms such as
- Fast Forward and LinkedIn learning
- Recorded 2,585 total training and learning hours

Robust talent

development

programmes

As part of Axiata Digital's ongoing people development, three areas were identified as focus areas for their diverse, digital business:

~7

Driving a culture of high-performance and accountability

Cascading business goals across all levels with emphasis on goal-setting, and increased communications and engagement initiatives by Senior Leadership Teams.

Creating an Employee Value Proposition

Reviewing the Total Rewards Philosophy, Culture and Values to build a cohesive, winning culture of ownership and customer-centricity with emphasis on employee wellbeing.



Focusing on communications and first-line manager training programmes to support continuous talent management, or manager development programmes to empower managers as role models.

O FEEL WAR

ම්දුම් Governance

Employee Health, Safety And Wellbeing

We are committed to building a healthy work environment that safeguards our employees' work-life integration, physical and mental health and safety. We provide a range of wellness programmes such

APPROACH

Axiata has instituted a Group Health and Safety Policy which is cascaded to each OpCo. OpCos are then responsible for ensuring compliance with local health and safety legislations. The Health and Safety Committees of each OpCo further promote awareness on workplace occupational health and safety to minimise the risk of accidents, injuries and exposure to health hazards. The identification and as exercise classes, health assessments and healthy living benefits to enrich the working lives of our employees.

remediation of any identified workplace hazards and risks ensure that employee wellbeing and safety are managed, workplace injuries are avoided and the company's occupational safety standards are upheld. In addition to meeting local regulations, our OpCos also comply to international standards and management systems, ranging from OHSAS certification to ISO45001:2018.

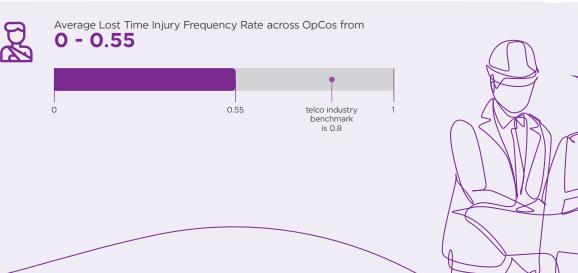
OUTLOOK

Ensuring health, safety and wellbeing for our employees will remain a priority, in the care we provide to our workforce Group-wide as well as the management and monitoring of our health and safety indicators. Amid the changes in working styles felt across the Group, we will continue to update our programmes in responding to the expectations of our people.

Health and Safety

As part of the policies and guidelines that OpCos comply to for occupational health and safety, the health and safety culture is further ingrained through general and skills-based or functions-based training and awareness programmes that are provided annually. Refresher courses are also held for occupations which face higher risk hazards, such as working at heights or on-site and emergency response, among others. Additionally, general health and safety knowledge is shared regularly across the OpCos for employee-wide understanding and practice of workplace health and safety.

To monitor and manage hazards, incidents and near-miss incidents, our OpCos utilise digital systems for efficient management and risk mitigation of health and safety in the workplace.





Employee Health, Safety And Wellbeing

Employee Wellbeing

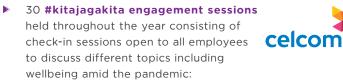
Our employee engagement activities for 2020 focused on finding ways to maintain interaction, strengthen relationships and engage teams virtually amid the health and safety concerns during the year.

Leveraging on our expertise as a digital telco and digital service provider, our respective human resource departments across OpCos adapted guickly to embrace virtual engagements and communications with our workforce.

Additionally, Group-wide and regional Townhalls, which we conduct regularly to engage with our employees, utilised a different approach which focused more on content-driven engagements and that prioritised employee wellbeing. We recognise that employee engagement is critical to keep our workforce motivated, boost morale, reduce attrition and foster a high-performing workforce.

The approach to employee engagement took an increasingly digital approach, with the support, engagements and assistance to employees, at home and in their communities, without compromising our people's ability to serve our customers. Across our OpCos, we also released guidance and ensured strict implementation of SOPs, including guidelines for working from home and providing PPE and sanitisation kits. We also stressed on caring for employees' physical and mental wellbeing.

- Established a collaborative support system providing:
 - Advanced COVID-19 monitoring and tracking
 - **Extensive medical support** for testing availability and access to healthcare services, equipment and support
 - Live sessions by guest speakers invited to share advice and support for mental resilience during the pandemic and challenges from lockdowns such as parenting during work, fitness and health
 - **COVID-19 awareness** for new joiners
 - Issued "Guideline for Home Office" to assist employees with continuing to work effectively and safely from home





- Emphasised #AllHandsOnDeck and the presence of the Culture Transformation Division to provide assistance
- Followed by regional #kitajagakita 2.0 sessions, with Senior Management involved in the departmental sessions
- Employee self-health check function on the employee app to provide daily updates on employees' health status
- Establishment of Celcom COVID-19 taskforce as an official communication channel for staff including a hotline and e-mail
- Medical support to employees and their families by collaborating with hospitals for immediate medical support and tie-ups with hotels for isolation provisions

robi



- Consistent employee engagements and regular team meetings by CXOs and C-1s, as well as employee NCE pulse checks
- Caring for employee health through "Health Week", stress management sessions, distribution of PPE to employees, free data for working from home
- Facilitating travel for essential reasons, through vehicle passes to pass through government entities, of Ncell partner employees, to employees during medical requirements
- Support extended to vendors and vendor employees through coordination with government entities for uninterrupted supply chain, letters sent to vendors for precautionary measures while providing services to Ncell
- Cleanliness and hygiene of offices through regular disinfection, housekeeping SOPs, daily health declaration and HR monitoring, alternate office premises when necessary
- Launch of Ncell Employee Safety Tracker for mandatory-use by employees to track their health and wellbeing and their family members

Employee Health, Safety And Wellbeing

Employee Wellbeing (cont'd)

- Establishment of the Smart COVID-19 Task Force as a standing crisis response committee with a direct communication channel to staff
- A secondary site was set up in order to split up contact center teams so that there Smart is social distancing within the workforce
- Enforced SOPs across our offices and retails to ensure that the safety of our employees comes first
- Provided extra mobile data for employees working from home
- Provide extra bonuses for frontliners to encourage their commitment to ensure our network operation is up and running
- PPE distributed to all employees and COVID testing was provided



- Over 2,500 tests were conducted with treatment provided to positive cases, and contact tracing to manage the risks
- All Dialog office locations were sanitised regularly and office visitors and employees were requested to provide their health declaration before entering offices to ensure safety of our employees on our premise
- Knowledge sharing sessions conducted for all frontfacing teams, including Customer Field Support Services, Technical Service Center, Engineering and Dialog Network Services teams. A total of 300 individuals were trained

Multiple communications sent to employees related to MCO, CMCO, SOPs,

travel guidelines, work from enabling connectivity home and other matters

- edotco Wellbeing Helpline was set up as well as a HR Helpdesk to support employee's communication related to the pandemic
- Employee's Stress Management tools were also provided to support the mental health of our employees

 Introduced the Mind Body Soul personal development programme to promote the value of learning, exercising and mental health



- System digitisation has been applied organisation-wide across multiple divisions and departments, for more effective productivity at home that included e-administrative processes of electronic invoices and digital signatures
 - Policies for the new work model (Flexible WFH Policy, Employee Welfare Policy)
 - Benefits that matter (home equipment allowance)
 - Addressing mental health (Mental Health Helpline and workshops by Naluri)
 - Prioritising employee wellbeing (Have Fun and Do Good, Disrupt! Disrupt! Disrupt! Act Now)
 - Collaboration and transparency as a way of working (Disrupt! Disrupt! Disrupt! Fail, to Learn, Dream big & be bold, Be humble and Team Up)

Customers

Our customers are the reason we exist. Their experience on our network, from quality and availability, the pricing of our products and services, and the value we can deliver to them beyond that of our competition are all areas they have identified as crucial to their customer experience.

Every day, we challenge ourselves to rise to their expectations, striving to be the lowest-cost producer relative to our customer promise. Operational excellence is driven in line with our customers' needs. Hence, we have created digital lifestyle products and self-care services as well as digitised our processes to provide a seamless customer experience. To ensure we are constantly tuned into their needs and understand their expectations, we undertake a range of surveys across our markets, scoring our performance against our peers to drive operational excellence.

Providing for customers during COVID-19

Our digital telcos responded to customer needs during the pandemic with a focus on providing data at affordable prices to enable continuous connectivity through:

- Digitising top-up/recharge services and bill payments
- Providing bonus, free or unlimited top-up/recharge/talk time and data as well as discounts, rebates, cashback and credit facilities
- Developing specialised packages such as for online studying, work from home, and internet-only SIMs
- Extension of services on own and retail channels to ensure uninterrupted network coverage and customer service availability



APPROACH

Our brand promise stands on our efforts to deliver optimum customer satisfaction on a safe and secure network, driven by multi-channel touchpoints to provide seamless customer convenience and bring us closer to our customers. We also work closely with our partners to provide innovative products and services at the best value. We leverage on our analytics community across Group to offer products and services targeted to a segment of one, that enrich the digital lifestyle of our customers. Embedded across all our digital platforms is a commitment to cyber security to ensure the privacy of customers is safeguarded.

OUTLOOK

As we seek to become one of Asia's leading telcos we will continue to focus our efforts on digitising the customer journey for enhanced customer satisfaction. This will be undertaken in tandem with our expected growth in market capitalisation, enabling us to generate strong returns on our capital investments.

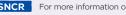
Customer Experience

Our customer service culture is embedded within our organisation, with Group continuously finding ways to strengthen our customer-first mentality to ensure we serve our customers in the best way possible.

We are committed to offering our customers excellence network reliability and access for the **best network and service experience**.

SNCR For more information on our network quality and coverage, refer to page 27

Additionally, as a digital service provider, we are cognisant of our responsibility to protect the data that our customers, employees and other stakeholders have entrusted us with. We have made data privacy and cyber security our priority and continue to strengthen our efforts in this area to maintain this trust placed in us by our customers.



SNCR For more information on our data privacy and cyber security measures, refer to page 75

Social - Customers

Customer Service

Digitising Customer Experience

In championing digital telco services across our OpCo markets, our customer journey has been increasingly digitised across the Group. Tools such as process automation, data analytics and intelligence have enabled us to improve the customer onboarding experience, shorten turnaround time, and offer relevant and improved services.

- Established a Customer Experience & Service Operation Centre (CE & SOC), an integrated centre to facilitate coordination in addressing potential issues related to network performance and service quality, as well as enable service quality monitoring, increasing the speed and accuracy of its customer services
- Modernised its digital touchpoints, MyXL, Axisnet and SiDompul, improving the user interface and experience, resulting in growth of its users
 - Launch of customer service call centre available 24/7, in addition to social media channels and apps for customer messaging

a Revamped Life App & Life Hub, its mobile app

and customer service portal, with Life App registering higher log-ins and rated as a top app

celcom

- Launched WhatsApp as a channel to interact with customers
- Enhanced chatbot on multiple interacting channels to encourage self service
- Launched Dash4Me Express
 Delivery, enabling customers to receive devices and SIM packs within 1-2 days, fulfilled end-to-end via Online Shop



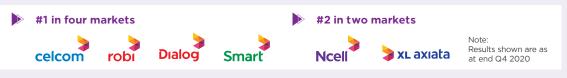
Customer Satisfaction

The customer experience (CX) is a key component of our identity. We have put in place the appropriate systems to measure our progress in meeting our customers' needs and expectations. Every year, we define mutually-agreed CX KPIs with our OpCos which are benchmarked against their peers. Performance is monitored on a quarterly basis.

Across our OpCos, we also continue to demonstrate a strong brand presence and customer satisfaction.

Net Promoter Score

Measures customer experience of our brand and provides a metric to anchor our customer experience management programme.



Digital Reputation Score

Measures positive sentiments across all digital platforms of our Digital Telcos brands, evaluating brand performance in the market through volume of positive mentions.



Brand Power Score

A prediction of the brand's volume share based purely on brand perception (based on three categories - meaningful, salient and different).



In 2020, due to change in agency and proprietary calculations, we have changed from Brand Equity Score to Brand Power Score. Notes: 1 Includes Xpax Includes Aris 3 Includes Aris

9 INCLUSTRY INFORMATION AND DEFINITION

Governance

Suppliers

Material Matter: Supply Chain Management	٥
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APPROACH

Our supply chain management is governed by our Group Finance, responsible for supply chain and procurement, with Group Procurement overseeing and executing all Group-wide procurement practices and supply chain management.

Axiata Supplier Code of Conduct

Our Axiata Code of Conduct extends beyond our employees to all our contractors and suppliers. In committing to the Code, we are able to screen and monitor how our suppliers adhere to the ESG issues in their operations and dealings.

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ENVIRONMENT Environmental management and environmental protection

SOCIAL

Labour standards and conditions,

wage and benefits, working hours,

respect and dignity, non-discrimination,

freedom of association, health and safety

GOVERNANCE

 Relevant laws, regulations and legal requirements, ethical business practices, compliance to anti-bribery and anti-corruption, conflicts of interest, data privacy and cyber security

Social

In the event a supplier does not comply with the Code of Conduct, we have also put in place mitigation measures to assist with compliance and to address the issues remediation.

Axiata Procurement Centre

Our Group-wide Procurement Centre monitors and manages our suppliers, addresses supply chain risks and establishes new vendor relationships to diversify our suppliers and reduce the risk of dependency on any one vendor. It is also responsible for:

- Sourcing and procuring strategic Network and IT equipment, solutions and services for Axiata, as well as indirect goods and services for our Corporate Centre
- Conducting ongoing audits of processes and compliance to Axiata's policies
- Refining our procurement process to improve agility in support of strategic business direction
- Managing key suppliers performance and suppliers relationship

OUTLOOK

Given our presence across Asia, our performance and exposure to risks around supply chain disruptions hinge on our supply chain management. We recognise that the performance and responsibility of our suppliers impact our own services, and beyond Axiata. We will continuously work collaboratively to enhance industry standards across our value chain and beyond our supplier community.

Our suppliers provide us with the required products and services which allow us to serve our customers. We value their contribution to our business and regularly engage with them. We seek to understand their expectations and concerns, and ensure we address these appropriately. By treating our suppliers with respect and taking due consideration on their needs, we believe we have adopted a sustainable approach to managing our supply chain.

The Group works closely with an extensive supply chain consisting of more than 5,600 suppliers. From equipment and infrastructure vendors who bolster our back-end operations, through to advertising agencies and content providers who help us communicate with our customers, these suppliers are critical to our daily operations.

Impact of COVID-19 on our Supply Chain

The COVID-19 crisis has put our supply chain ecosystem in a state of flux. Many of our dealers were required to shut down their physical premises in line with lockdown measures.

Given the increase in operational risk resulting from the pandemic, we conducted a COVID-19 preparedness process, guided by our BCM Framework, to address and mitigate risks across all aspects of our operations.



Supply Chain Management

Delivering Operational Excellence across the Value Chain

Supplier Engagement

We provide training and conduct engagements with our suppliers every year to contribute to their upskilling in areas relevant to our business. These activities are undertaken in an effort not only to enhance our suppliers' operational excellence, but also as we believe that their performance reflects on our own goals and performance.

Group-wide, some of the engagements from our OpCos focused on:

- Process awareness and training on procurement and e-procurement processes, compliance training, onboarding and offboarding procedures, vendor registration and refresher training programmes
- Development sessions
- Risk mitigation discussions
- COVID-19 awareness and ease of movement awareness during lockdown periods
- Technical operational efficiency training and awareness

Supplier Performance Management

We believe supplier performance management plays a key role in encouraging:

- Common and transparent assessment of our suppliers' performance
- Compliance with commercial and contract terms, quality of performance and delivery, and contributing to the delivery of our corporate strategy and roadmap as well as alignment to our ethical and sustainability values
- Capacity building, business development, technical assistance and contract financing to support development of local vendors

During the year in review, our Group Procurement conducted a supplier performance management assessment of the Group's key network and IT suppliers. Among activities under the assessment included our suppliers' commitment to sustainable business practices, where suppliers were asked to complete a self-assessment of their sustainable business practices. We then evaluated and scored the self-assessments, with the scoring including other additional information available on the supplier such as sustainability reporting, anti-corruption practices, environmental management, labour practices and occupational health and safety, as well as assessment of their own suppliers.



Supply Chain Management

Supporting Local Ecosystems - Vendor Development Programmes

With our standing as one of Malaysia's home-grown champions making up a key component of our identity, we value our responsibility of contributing to vendor development. Vendors are provided upskilling towards service excellence as well as growth opportunities that benefit not only the vendors, but also create socioeconomic multipliers.

Specifically, we see supporting local suppliers as making good business sense across the ESG spectrum. In addition to contributing to local economic growth, working with local suppliers reduces the transport of goods and services, lowering emissions and improving environmental outcomes.

On the social front, local suppliers benefit from local employment opportunities, while we have been able to develop more meaningful relationships with our suppliers when they are closer in proximity. This also reduces the risk of supply chain labour conditions, as we gain more visibility on the treatment of their workforce when they are located in our market. Furthermore, site visit audits provide us with better oversight on their labour practices.

We are committed to supporting the long-term development and creating positive outcomes for the more than 10,000 individuals employed in our supply chain. To this end, our vendor development programmes include providing key partners with additional training, business insights and networking opportunities to grow their business.

Celcom Vendor Development Programme 2.0

Celcom introduced its VDP in 2016. It has since launched VDP 2.0 to support and develop local vendors within the digital ecosystem. The new programme also aims to develop capable and competitive suppliers who can complement Celcom's ecosystem and become self-sustaining, with a view on equipping vendors to succeed in IR4.0. The programme is aligned with the Malaysian government's National Entrepreneurship Policy 2030.



2020 Activities

- Held 15 training courses with 6 technical agencies
- 31 vendors underwent SCORE (SME Competitiveness Rating for Enhancement) assessments. SCORE is undertaken through SME Corp to measure vendors' process excellence and empower vendors
- Let's Engage session with SME Bank
- · 2 new MoUs signed with Malaysia Debt Ventures (MDV) and Perbadanan Usahawan Nasional Bhd (PUNB) for financing facilities
- 1 vendor secured a RM959,000 research and commercialisation grant from the Ministry of Entrepreneur Development and **Cooperatives (MEDAC)**

edotco Vendor Development Programme

Since 2018, edotco has put in place a VDP aimed at strengthening the competitiveness and capabilities of local vendors supplying parts and components to local and regional markets.

Highlights

Vendor

Development

Programmes

- 3 vendors registered
- Introduced vendors to commercial opportunities in Philippines, Pakistan and Laos
- Established support programmes, including:
- Enrolment of VDP partners in IBWave Certification Programme on in-building wireless network planning and management
- Under business development, engaged VDP partners in businesses bevond their core business

2020 Activities

- Vendors completed IBWave Module 2
- Vendors engaged in regional tower strengthening projects



Supply Chain Management

Digitising Procurement Processes

Our vision of becoming The Next Generation Digital Champion encompasses all aspects of our business. The COVID-19 crisis accelerated the necessity for the digitisation of processes, especially due to the transition to remote working in line with lockdown requirements.

Digitisation has allowed us to significantly reduce our paper resources while at the same time empowering vendors with digital skills.

Case Study: Paperless Invoices at XL

Building on its digital vendor registration and Purchase Order management, XL has implemented a paperless invoice system. To address the capabilities of all groups of suppliers, the system is implemented in two ways:

Coupa System Invoices

The Coupa System enables electronic invoicing from suppliers, with paperless invoicing introduced in 2020. As part of supplier education on the system, XL educated suppliers on the benefits of avoiding paper usage in reducing environmental impacts. A formal socialisation and assistance programme was conducted for suppliers, targeting those who still relied on paper invoicing

Non-Coupa System

Amid the COVID-19 pandemic, XL also encouraged other third parties to take up paperless invoicing and documentation

Outcomes:

- 23,902 invoices processed via the Coupa System
- 78,170 soft copy invoices submitted outside the Coupa System
- Avoidance of approximately 408,288 printed pages

200

Social

Supplier Spending

We engage with various suppliers across a range of categories and sizes. As part of our efforts to contribute to supplier diversity across our portfolio, support local economic development and empower the digital ecosystem, we monitor the proportion of our suppliers that are local as well as the proportion of our spend on local suppliers across our different OpCo markets. In 2020, we continued to spend more than half of our total spending on local suppliers.



Note: Graphs represent spending accounted by Axiata Procurement Centre which excludes edotco

Society



Our regional presence puts us at the heart of diverse, local communities striving to participate in rapid socioeconomic growth. We are committed to supporting the principle of the UN SDGs, calling for the achievement of holistic sustainable development for all and leaving no one behind. Across our markets, we recognise the value of education and have developed programmes and offered scholarships to

support the education needs of the next generation. We identify and work with local partners on unique programmes that leverage our OpCos' individual strengths and assets in connectivity, infrastructure and digital services to meet the specific needs of local communities.

Impact of COVID-19 on Community

While the impact of the pandemic varies from country, it will most likely increase poverty and inequalities at a global scale, presenting greater challenges in achieving the SDGs.

Against this backdrop, digitalisation will form a key focus area to ensure the SDGs remain on track. The pandemic has accelerated the uptake of digital solutions and sped up digital transformation, helping governments, businesses and people manage pandemic responses, and cope with the immediate effects of social distancing and other containment measures. However, these solutions were not available to all, with many poor and vulnerable groups unable to afford or access them.

Digital financial services have also emerged as a vital tool in enabling commercial transactions, delivering aid and allowing customers to access financing solutions.

Additionally, regional cooperation will play a growing role in managing the transition out of the crisis. Regionally, governments and corporations must focus on people and inclusive cooperation, with environmental sustainability becoming central to economic and physical integration efforts. Furthermore, regional cooperation must support countries to become more resilient and aid people-centred development.

On our part, we mobilised rapidly to come to the aid of the various communities we engage with, in an effort to ease their burdens in confronting the crisis. Across our markets, we contributed to relief efforts for frontliners, small businesses and underserved communities, providing donations in cash and in kind. We also leveraged on our technology capabilities to support governments in managing the crisis.

For full details on our community response to COVID-19, please refer to the Emergency and Disaster Response section of this chapter

Community Development

We value the relationships we build with our communities and leverage on partnerships with local NGOs to foster digital inclusion and exercise our corporate responsibility to address community needs. The needs may include our support of the UN SDGs, capacity building of future leaders, pre- and post-disaster assistance, as well as any other gaps that may exist in each unique market.

APPROACH

Engagements with our community are conducted digitally as well as through print media, communicating our efforts to foster digital and financial inclusion, support disaster management and response, implementation of our Axiata Young Talent Programme and establishment of Digital Innovation Funds to promote digital and technology advancements.

OUTLOOK

We are committed to supporting the principle of the UN SDGs, which seek holistic sustainable development for all and to leave no one behind. Recognising the value of education in uplifting societies across our markets, we have developed programmes and offered scholarships to support the education needs of the next generation. We will remain focused on contributing to national and global community development and empowerment for our communities.

Building Future Leaders

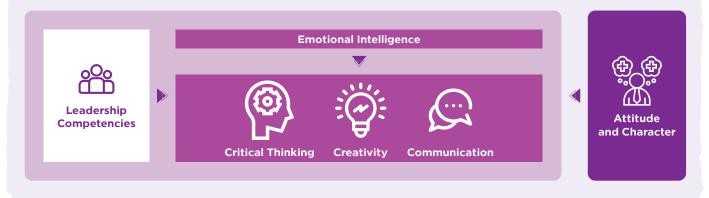
We have determined that the provision of opportunities to young talent represents an area to which we can contribute meaningfully, and is integrated to our vision of Advancing Asia. By identifying promising talent and nurturing them into future CEOs, we are committed to developing the leaders of tomorrow.

As we move into IR4.0, characterised by digitalisation and technological disruptions, countries around the globe will need capable CEOs to lead efforts to harness new opportunities. Through our presence in our footprint countries, we have seen that the region is home to innovative and driven young talents eager to uplift not only themselves, but also their own communities. We value the enthusiasm demonstrated by these youths, who represent the future of their countries and are committed to helping develop their potential.

In view of this, in 2011 we made a commitment to invest in a young talent development programme geared to support the individual nation-building needs of our markets. First introduced in Malaysia as the Axiata Young Talent Programme (AYTP), the programme has been replicated in Indonesia as the XL Future Leaders Programme and the SmartEdu University Student Development Programme in Cambodia.

The programmes were designed to offer top students and promising young talents with an enriching leadership experience which prepares them with the skills and competencies as future CEOs and corporate leaders.

The programme framework is anchored on leadership competencies as well as attitude and character. These, in turn, are centred on emotional intelligence covering critical thinking, communication and creativity. Participants are exposed to various modes of learning, including experience-based, education-based, relationship-based and personal-based.



Community Development

Building Future Leaders (cont'd)

Axiata Young Talent Programme

Since 2011, we have committed RM100 million over 10 years to focus on young talent leadership through the AYTP. To date, **2,262 young talented Malaysians** have benefited from this programme, implemented in three leadership development tracks:

- School Leadership Development Programme (SLDP): A five-year programme held in partnership with Kolej Yayasan Saad in Melaka. Open to all Malaysian secondary school students who are looking to develop their critical skills and command of leadership competencies
- University Leadership Development Programme (ULDP): A two-week summer-camp leadership development programme for young Malaysian undergraduates as an opportunity to learn future-CEO skills and knowledge
- Young CEO Development Programme (YCDP): A two-year leadership development programme for young Malaysian professionals that provides them the opportunity to master critical skills and knowledge required of a future CEO
- AYTP Alumni Association: Established in 2015, the association was rebranded as Emerging Leaders Asia in 2020. It serves as a valuable platform for alumni to engage in lifelong learning with the intention of becoming a talent pipeline of CEO-ready individuals. This is achieved through various initiatives such as:
 - Action learning programme (with industry partners)
 - Masterclass (professional and personal development)
 - Mentor-for-mentor programme

2020 outcomes

To date, **1,462 students** have graduated from AYTP

- A total of 2,262 have benefited from the different programmes
- More than 30 bootcamps conducted within 2020
- Moving forward in 2021, AYTP will upscale its impact and reach with partnerships and strategic partners

XL Future Leaders (XLFL)

XLFL is designed to meet the learning needs of the new generation of Indonesian leaders through workshops, online activities and team-based projects. The initiative offers three programme:

- XLFL Global Leaders: A two-year intensive leadership development programme for university students delivered by experts using the XL Curriculum, which was developed by world-renowned educational thought leaders and reflects the needs and aspirations of young Indonesians
- XL Scholarship Camp: A programme which provides young Indonesians with strong academic background the opportunity to participate in a series of personal development initiatives to extend their skillsets beyond the classroom
- XL e-Learn: The open and free one-year curriculum provides all students with access to a world-class leadership development programme written specifically for young Indonesians

2020 outcomes

More than 35,000 applicants registered and 160 students selected for participation (covering 42 cities and districts in 23 provinces)

Over the past nine years, XLFL has a total of **1.000 alumni**

Amid the pandemic, XLFL activities shifted online including seven XLFL workshops, involving leadership training for the children of XL's employees, six public workshops of 1,300 participants, and industry visits to Indonesian college students from XL

SmartEdu

SmartEdu represents the talent development initiatives executed in Cambodia by Smart. Anchored on Axiata's vision for talent development, SmartEdu supports secondary school students to continue their college education and provides talent youth with the skills and abilities to become future leaders. SmartEdu currently operates the following programme:

SmartEdu Scholarship Programme: The programme aims to encourage secondary school students in Cambodia, especially those who are struggling financially, to pursue their college education. Each selected scholarship student receives a stipend of up to USD20,000 to cover their tuition and living expenses during the study period

2020 outcomes



SmartEdu Induction Camp: A two day orientation bootcamp for SmartEdu scholars to prepare themselves for the university journey as Smart scholars, focused on enhancing soft skills and improving the relationship with different cohorts

2020/2021: 20 students

SmartEdu Discovery Day: Due to COVID-19, the partnership between Fulbright and Undergraduate State Alumni Association of Cambodia (FUSAAC) and Smart conducted its annual Major and Career Fair online



Uplifting Communities with Long-Term Solutions

Across our markets, we develop programmes and initiatives in consideration of local socioeconomic needs. We work with local partners to deliver these programmes which leverage on our OpCos' strengths in connectivity, infrastructure and digital services to create meaningful change.

During the year, these programmes on continued support in centred education, connection to basic utilities and humanitarian causes.

Supporting education **Ncell Scholarships and** Ncel

Ncell Excellence Awards recognise and facilitate the academic achievers identified in Nepal. Each scholarship and award are worth NPR100,000, with the OpCo committing to sponsor NPR13 million worth of scholarships and excellence awards to top-scoring students up to 2023.

Ncell Scholarships

▶ 18 Scholarships to topper students of BE Electrical. Electronics and Communication, Computer, Civil and Mechanical Engineering

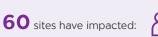
Ncell Excellence Awards

▶ 6 Excellence Awards to topper students from five faculties, as well as to a female student graduating with top scores among all female students of the five faculties

Connecting to Basic Utilities

Access to basic utilities is a human right, which also enables pathways for community enrichment and development. Yet many of our communities still lack access to utilities such as clean water and electricity, as they reside in countries whose economies are still developing. Recognising this, over the years we have strived to play a meaningful role to enhance their lives.

edotco's Tower to Community Programme



to the library from the multi-

Schools

Launched in 2016, the Tower to Community programme seeks to improve the quality of life of the communities that live near our towers. During the year in review, the programme was introduced in Sri Lanka, now bringing it to six countries. Through this project, communities are provided with electricity, including energy to power refrigeration systems for vaccine storage facilities, clean water for drinking, agricultural irrigation and to water livestock, and WiFi access. The programme also distributes humanitarian aid during natural disasters.



bookshelves

purpose lamp pole



350 library members 1.015 families received access benefited from the donation of books, a computer and

Robi's Water for Railway Passengers Programme

- to safe drinking water through advanced Reverse Osmosis (RO) water treatment plants Provided WiFi connectivity
 - 120 people benefited from electricity provided to homes and mosques

▶ 1,200 people from 300 families benefited from the installation of a solar water pump, which provides an eco-friendly source of clean water to irrigate crops, water livestock or provide potable drinking water

- ▶ 1,295 people received access to safe drinking water through RO water solution
- ▶ 927 people gained access to electricity for their homes

Robi's Internet Corners

With technical support from WaterAid Bangladesh, Robi has set up 10 water plants strategically placed at 10 of the busiest railway stations in Bangladesh to ensure wide access to safe drinking water.

Each plant has the capacity to dispense 5,000 litres of pure and safe drinking water per hour.

Taking into account the religious needs of the people of Bangladesh, the plants have segregated corners for men and women, as well as a separate space for ablution. Additionally, the plants have been fitted with ramps for the convenience of wheelchair users.

Installed across seven divisional libraries, providing free internet access to facilitate students of public libraries and general users with access to online resources for a wealth of information and knowledge.

Community Development

Uplifting Communities with Long-term Solutions (cont'd)

celcom

Employee Volunteering

While COVID-19 risks reduced direct access to local communities, our employees still found ways to contribute to our communities' needs through volunteer work. The volunteerism took on particular urgency given the critical needs of underserved communities amid the pandemic.

- National community building efforts
 - during pandemic community relief and natural disaster response
- Celcom Musolla An-Nur and Tabung Amal Jariah Celcom contributed food and basic necessities to communities affected by the pandemic

robi

Bersama Bangun Negeri (BERBAGI) programme for employee volunteering held online knowledge sharing sessions with students from across four schools on topics that included digital skills, safe and responsible social media content creation, website development, among other skills. In addition, students in each location received quota donations, improvements to school facilities, clean water facilities, and cash donations. Around 400 students benefited from these online engagements held by XL employees

Emergency COVID-19 Fund made

up of employees' contributions of one day of their basic salary

Food donations to COVID-19 affected/ vulnerable communities

Smart established its Employee Volunteer Programme to raise awareness

within the company and to encourage employees to conduct community service

- a platform for employees to initiate and volunteer on Smart priorities. The programme targets to **solve environmental issues in Cambodia**, such as the use of single-use plastics, deforestation, climate change and environmental education, among others

In line with SDG 2: Zero

Employee Voluntary Engagement programme worked with NGO Rise Against Hunger Malaysia, to **distribute 10,000 meals to charity organisations** supporting single mothers and their children

Hunger, edotco's

 34,850 individuals benefited from flood and COVID-19 relief aid

Contributing to Healthcare for Communities

VISION 2020 in Sri Lanka

Since 2015, Dialog has supported VISION
 2020, a global initiative by the World Health
 Organisation (WHO) and the International

Agency for the Prevention of Blindness (IAPB) aimed at eliminating avoidable blindness. Spearheaded locally in Sri Lanka by the Ministry of Health, Dialog has supported eye campaigns, recently rebranded as the "Nethra" programme

Social

Governance

To date, Dialog has invested around SLR14.8 million, screening 20,930 low-income individuals and distributing 18,140 custommade spectacles free of charge. In 2020, two eye camps were also conducted, with 930 people screened and 653 spectacles donated to beneficiaries

Nepal's National Measles Rubella Vaccination Campaign



Dialog

- Ncell supports the government in raising heath awareness among the general public for epidemic and non-epidemic diseases, including undertaking immunisation activities. Ncell was the awareness campaign partner of the Government of Nepal, Ministry of Health and Population for the mass immunisation for measles and rubella
- The campaign has targeted to vaccinate over 2.5 million children across the country between the ages of 9 months to 5 years. Delivered through multimedia channels, leveraging on the reach of Ncell's connectivity platforms, the campaign achieved 101% success against the vaccination target

Emergency And Disaster Response

As a digital business, we possess the capability to reach communities en masse. By leveraging on our ability to broadcast widespread multimedia messages through our platforms, our products and services serve as a vital community need in times of emergencies and disasters.

APPROACH

Our technology and resources allow us the medium and capabilities to assist, inform and support communities during times of need. From natural disaster awareness, preparedness and response, to unforeseen emergencies and critical situations, our OpCos assist in information sharing, providing reliable connectivity, especially to vital services, contributing to the overall safety and protection of society.

OUTLOOK

With our OpCos in strong partnerships with disaster network agencies, foundations and organisations, we strive to continue expanding on the reach, success and value of our digital services.

Natural Disaster Preparedness

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With some of our footprint countries located in disaster-prone areas, we continued to lend our support to natural disaster preparedness through the provision of timely information and connectivity access through our Digital Telcos. This is crucial to reducing the potential loss of life by ensuring updated, official information and warnings are shared and humanitarian relief can be coordinated effectively. Our efforts in this area are in line to

Provided SMS alert warnings to

the public to raise disaster preparedness during the flooding in the East Coast of Malaysia which occurred late last year

- Established the **Smart Axiata** Flood Relief Fund to enable its subscribers to donate to victims of flooding from tropical storms that occurred across Cambodia in October 2020
- Provided up to **USD66,000 in matching funds** to the Smart Axiata Flood Relief Fund
- **Funds were used to purchase emergency response kits**, which included food supplies, that were provided to 3,360 families in the worst-affected provinces

Ncell

our responsibility as a signatory of the GSMA Humanitarian Connectivity Charter.

During the year in review, we participated in the following disaster relief efforts:

Distributed hygiene kits and basic necessities to 1,600 recipients in the eastern and southern regions affected by floods in Malaysia via edotco fleets and NGOs

Social

 Distributed relief goods to 1,200 recipients from 300 families in Patuakhali district, Bangladesh, impacted by Cyclone Amphan

- Flood Early Warning System in partnership with Department of Hydrology and Meteorology (DHM)
- 2.85 Million flood related alerts broadcasted
- 500 Ncell SIMs with monthly 250MB data per SIM provided to DHM to use in transferring weather and river level data to servers
- **Toll-free number** assigned for customers to call for latest updates
- Participated in the relief efforts post-natural disaster throughout Indonesia through distributing aid that included food, medicine,



clean water and masks for the prevention of COVID-19 outbreak following the natural disaster

More than 12,200 people impacted by disaster received assistance



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Emergency And Disaster Response

Lending Our Support in the Battle Against COVID-19

By and large, our contributions to the battle against COVID-19 formed the most critical component of our community relief efforts undertaken in 2020, and no doubt will dominate our focus in the short-term. Telco services have proven indispensable during this period, with millions of customers relying heavily on our services to stay connected.

Additionally, digital connectivity has become more crucial not only in this age of physical distancing, but also in delivering timely and vital information on COVID-19-related developments.

- Axiata, Celcom, edotco and Axiata Digital launched a RM150 million (USD35 million) cash fund to provide financial assistance to micro-SMEs
- Our Corporate Centre distributed close to RM100,000 to charitable organisations in Malaysia for medical aid, financial aid, shelters and relief funds
- **Established the USD1 million COVID-19 Relief**

Fund to provide monetary assistance for high-impact solutions to address Cambodia's urgent crisis needs. This fund is in addition to Smart's CSR commitment of distributing 1% of its revenue to community causes

- More than half of fund has been allocated to date for projects that address key issues stemming from the pandemic such as enabling rural communities to fully leverage online education initiatives by the government, and supporting and empowering affected micro-SMEs/SMEs/startups
- Together with Huawei, Smart installed a temporary onsite COVID-19 co-ordination and monitoring centre for the Ministry of Health
- Connected the Khmer Soviet Friendship Hospital and Chak Agre Health Centre with the Ministry via video conferencing facilities using Smart's 5G trial setup to ensure dedicated, fast and consistent performance. This temporary setup became the first-ever live 5G use case in Cambodia

Across the Group, our OpCos stepped up as connectivity champions in national COVID-19 relief efforts, leveraging our capabilities in connectivity, data analytics and network coverage and presence in each market.

Beyond ensuring continued connectivity through our services, we mounted a rapid and far-reaching response to channel aid to health frontliners and at-risk groups. We distributed food, hygiene kits and general wellness care to frontliners, communities, retailers/distributors, and equipment to medical and health centres.

Extended NPR9.70 billion worth of CSR and relief support, which included NPR9.03 billion bonus balance to customers



- Contributed NPR100 million to COVID-19 Infection Prevention, Control and Treatment Fund on the first day of nationwide lockdown
- Broadcast PSAs in collaboration with Ministry of Health and Population (MoHP), National Health Education Information Communication Centre (NHEICC) and UNICEF, advocating social distancing, proper use of face masks and hand sanitisation
- The messages were **widely circulated via radio**, **television**, **online**, **print**, among others, to ensure the messages reach all segments of the population
- Supported Nepal's COVID-19 Crisis Management Centre with analytics for migration tracking and contact tracing
- Rolled out the Unstructured Supplementary Service Data (USSD), or quick codes, and Interactive Voice Response (IVR) survey to identify COVID-19 infected people
- Free access to government hotlines 1133 and 1115, allowing customers to consult with doctors
- Radio outreach programme airing learning programmes via 200 community radio stations supporting children who were schooling from home, estimated to have reached over 1.2 million children
- Ncell Free Hotline Service (which was also extended to Nepali migrant workers in Malaysia) and free Ncell Call to Doctor Service provided for consultation with doctors on COVID 19 signs and symptoms, and general health and wellbeing
- Collaborated with the Ministry of Women, Children and Senior Citizens and UN Women to conduct a rapid assessment survey on the impact of COVID-19 on women's mental and emotional health
- Conducted COVID-19 awareness messaging leveraging on internal platforms including more than 45 million SMS, more than 20 million OBD calls, COVID-19 awareness call tone, temporary network name change to #StayHome@Ncell
- Bonus balance, credit facilities, free digital services, data and voice services at affordable rates and stay home data packs



Emergency And Disaster Response

Lending Our Support in the Battle Against COVID-19 (cont'd)

- Provided big data platforms and advanced analytical tools and solutions to address key issues such as reducing people's risk of COVID-19 exposure while ensuring people remain connected
- robi
- Broadcast SMS awareness on high-risk zones in the country to encourage heightened precautionary measures
- Provided promotions and emergency relief when customers' credit balance/ data balance ran low to ensure continued connectivity
- Partnered with Access to Information, Bangladesh's digital public service delivery programme, and the Health Ministry to develop a cutting-edge mobile app to monitor and track the spread of COVID-19 across the country and show high-risk zones
- Provided technical assistance, together with two other partners, to operate the 333 National Information Centre - which had emerged as the National Health line during COVID-19 addressing issues ranging from relief assistance to telemedicine services as well as enabled door-step delivery of emergency relief and medicine during the nationwide shutdown
 - More than **23 million calls** received from March to December

- Together with Huawei Technologies Lanka Co (Pvt) Ltd, donated telepresence and connectivity solutions to 30 locations covering district general hospitals, teaching hospitals and designated COVID-19 treatment centres
 - Dialog

celcom

- Donated mobile phones with free allowances, WiFi routers, CDMA phones and PPE kits to hospitals
- Contributed towards improving intensive care facilities, providing state-of-the-art medical equipment, and enhancing intensive care unit capacity in Sri Lanka that would not only serve to treat COVID-19 but will also continue to support all other patients who require intensive care treatment, post-COVID-19
 - Invested SLR200 million towards the development of intensive care units at Homagama Base
 Hospital and Negombo Hospital
- Distributed 400 network-connected feature phones and 100 WiFi routers for frontline personnel and quarantine centres through the Ministry of Health
- Introduced e-connect/distance learning to enable schoolchildren to continue their studies from home
- Collaborated with media stations to donate over SLR50 million to provide relief to more than 95,000 people in need across 18 districts
- Provided communication relief to hospitals and quarantine centres across the country in the form of SIM packs and devices, amounting to RM159,154
- Donated RM421,600 in food supplies, funds and laptops to underserved communities throughout Malaysia



Participated in a pledge for 2021 named "To Malaysia with Love", a RM1 million collective contribution initiative with 5 other industry players and in collaboration with the GDRN



Governance

Emergency And Disaster Response

Lending Our Support in the Battle Against COVID-19 (cont'd)

- Provided post disaster relief and aid including distribution of PPE, medical equipment, MERCY Malaysia flights to Pakistan and Laos, necessities and cash donation that benefited more than 22,000 people
- eMalaysia: Provided sanitation and food aid for impacted families, university students and frontliners, benefiting more than 12,000 recipients
- eBangladesh: Launched food aid and sanitation programme in collaboration with NGO BRAC, reaching around 4,000 beneficiaries
- eSri Lanka: Donated Multiparameter machine to Infectious Disease Hospital's Isolation Ward
- PeCambodia: Donated surgical masks and gloves and temperature test kits to the Health Ministry's COVID-19 response team
- Philippines: Food aid distribution in collaboration with ABS CBN Foundation
- edotco Corporate Centre:
 - Cash donation to MERCY Malaysia to provide medical and food aid to impacted communities
 - Cash donation to Yayasan Pertiwi and Yayasan Sejahtera to provide food to 2,990 people
- A total IDR10 billion in funds donated to the National Disaster Management Agency (BNPB)
- 🔰 🗴 🕹 🖈
- Conducted two rounds of employee fundraising, raising IDR1.5 billion for PPE and donations for informal sector workers whose jobs were affected by the pandemic
- Strengthened data and telecommunications networks for COVID-19 hospitals, deploying mobile BTS to some hospitals to support the data traffic usage
- Providing data and telecommunications services to BNPB through 550 starter packs already activated, with a IDR50,000 package valid for three months
- Supported BNPB to broadcast SMS on the latest COVID-19 information and regional hospital contacts
- Distributed 10,000 hazmat suits to 10 COVID-19 hospitals in Jakarta and West Nusa Tenggara

- **"Tabung COVID-19 by Boost**", a donation fund to help ease the burden of those directly impacted by the COVID-19 pandemic in Malaysia to aid medical frontliners and the families of COVID-19 patients. The fund was introduced in conjunction with the launch of the #BoostGotYou campaign, aimed to help Malaysians get through the COVID-19 crisis
- During Ramadan month Boost introduced its "30 Hari 30 Amalan" initiative, part of the larger #DoGoodWithBoost campaign, to donate to the underprivileged and less fortunate
- Over RM1.2 million was collected from both initiatives



Social

Chusen Aun CVM Analytics XL Axiata

l love teaching others how to grow their own food.

#ItBeginsWithMe

GOVERNANCE

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WHAT YOU'LL FIND IN THIS SECTION

Governance

We continue to place emphasis on the strictest standards of corporate governance as a function of the creation of sustainable, long-term value for all our stakeholders.

It is also imperative that good corporate governance is ingrained from the highest levels of our organisation, with our Board of Directors responsible for establishing clear policies and procedures to lead prudent decision-making and ensure discipline and accountability. The Board remains guided by its governance framework to ensure the best interests of the Group, its shareholders and other stakeholders are prioritised in the decision-making process. The governance framework is also continuously enhanced to ensure its relevance to current developments and regulatory requirements.

Business Ethics And Compliance

Key Highlights:

 Achieved a Group- Continued wide completion rate of over 90% for our Anti-Bribery and Anti-Corruption mandatory training module for our employees

 Contributed USD1.3 billion in accessibility taxes to the governments of all countries where we whistleblowing operate

78 Strengthening Risk Governance Structure and Risk Management 78 Anti-Briberv And

of our

channel

- Anti-Corruption
- 79 Whistleblowing (Speak Up) Channel
- 79 Tax Transparency

Data Privacy

Key Highlights:

 Implemented Group-wide Privacy Programme

- Rolled out and completed 90% of our mandatory training and awareness programme for the Group's employees and vendors processing critical assets and personal data
- Transitioning our cyber security strategy from Digital Trust 2020 to Digital Trust and Resilience 2023

Published Group

updated Privacy

Data Privacy

Policy and

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customers

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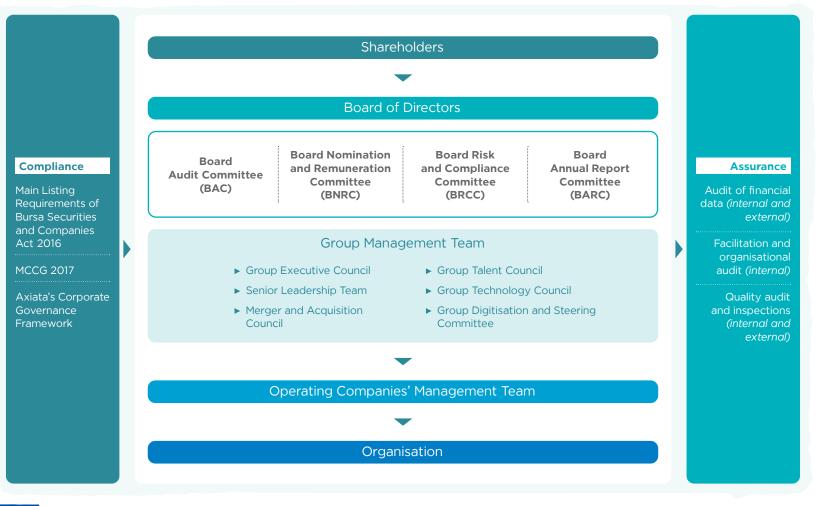
Regulatory and Political Risk

- Established a regulatory compliance framework to monitor regulatory compliance at the Group level and across OpCos in a more structured way
- Appointed subject matter experts at the Group level and OpCos to monitor regulatory compliance
- Strengthened political risk mitigation to enable better monitoring processes of key political and geopolitical events as well as anticipate emerging risks

Our Corporate Governance

At Axiata, we continue to uphold the strictest corporate governance standards as part of our sustainable and long-term value proposition for all our stakeholders. In this regard, the Board of Directors is responsible for establishing clear policies, standards, and ensuring that the decisions are guided by our Corporate Governance Framework. The Framework is continuously enhanced to ensure its applicability to current developments and evolving regulatory requirements.

The Board continues to ensure that Axiata's corporate governance is in accordance with the Malaysian Code on Corporate Governance (MCCG) 2017. We have adopted an iterative process of transparent reporting and disclosure, as well as rigorous risk and performance management, underlined by transparency, ethical and effective leadership. Furthermore, we leverage on the Board's diversity in gender, race, and professional backgrounds to achieve constructive deliberations which take into account the interests of our equally diverse stakeholders. Collectively, these corporate governance measures provide safeguards to our company strategy and contribute to value creation for our business and for all our stakeholders in the short-, medium-, and long-term.



IAR More details on our Corporate Governance can be found on page 80-103 of IAR 2020

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Business Ethics And Compliance

Ethics and compliance management ensure that the Group remains compliant with all applicable laws, regulatory requirements, and policies. Our culture of ethics and compliance, underpinned by our Uncompromising Integrity value, is embedded in our daily operations and engagement with all our stakeholders. Our Policies and Standards define a set of minimum requirements and practices that ensure the same level of professionalism, ethics and integrity is applied consistently with all stakeholders. We have zero-tolerance for any bribery and corruption. All stakeholders are mandated to avoid any activity that might constitute, lead to, or be perceived as, bribery and/or corruption activities and/or breach of any laws and regulations. The prevention, detection and reporting of any forms of bribery and corruption are the responsibility of all stakeholders across the Group.

APPROACH

Our Board Risk and Compliance Committee oversees the Group's risk and compliance related matters to safeguard our shareholders' interests and Group's assets. Following changes in the governance structure in early 2020, the compliance culture in Axiata was further strengthened by implementing guidance in the form of policies, standards, and procedures with reinforcement of these concepts through training and awareness programmes.

We ensure good governance is upheld through our risk and compliance governance structure, ensuring compliance to all aspects of the laws, regulations, and international standards applicable to our operations throughout the countries we operate.

Axiata's standardised Enterprise Risk Management (ERM) Framework governs our risk management and governance process. Although we appreciate that some autonomy is necessary within the local jurisdictions in each of our regions, our Group Risk Management department ensures consistency in the approach to managing risk across the Group. To this end, we have started to align the risk management practices among our OpCos, with full support from the Board Risk and Compliance Committee (BRCC) and the Group's Senior Management.

Board of Directors	Sets the tone and culture towards effective risk management, internal control in all aspects of the Company's activities and decides on Board's acceptable risk appetite whilst maintaining a proper balance between risks incurred and potential returns to shareholders.
Board Risk and Compliance Committee	Responsible and accountable for maintaining sound processes of risk management and internal control practices to safeguard shareholders' investments and the Group's assets. The BRCC also monitors Axiata's ERM framework and risks relating to cyber security, data privacy, as well as compliance, ethics and integrity.
Risk and Compliance Management Committee	The primary function of the Risk and Compliance Management Committee (RCMC) is to support the BRCC in fulfilling its responsibilities on risk management and compliance.
Group Chief Risk and Compliance Officer	Leads the Group Risk and Compliance Department.
Group Risk and Compliance Department	Executes and implements the strategies for risk and compliance at Group and across OpCos, including establishing and monitoring ERM Programmes, strengthening risk and compliance policies, implementing adequate procedures in line with Section 17A of the Malaysian Anti-Corruption Commission (Amendment) Act 2018, identifying key risks and mitigating actions, and inculcating culture of risk and compliance within the Group.
Risk and Compliance function (OpCos) and Business units (Axiata Corporate Centre)	Responsible for risk and compliance related matters in their respective OpCos and business units and coordinating with Group Risk and Compliance Department on implementation of risk and compliance related initiatives, policies and procedures.

OUTLOOK

With the introduction of Section 17A (S.17A) of the Malaysian Anti-Corruption Commission (Amendment) Act 2018 that came into effect in June 2020, the Group has established adequate procedures to ensure full compliance with this section. Further, in view of the current COVID-19 pandemic which has

dominated the risk landscape since 2020, the Group continues to demonstrate agility, supply chain risk oversight with technology and network resilience.

Governance

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Business Ethics And Compliance

Strengthening Risk Governance Structure and Risk Management

In 2020, the evolution of the Board Risk Management Committee (BRMC) into the BRCC, the establishment of the Group Risk and Compliance Department and the appointment of the Group Chief Risk and Compliance Officer (GCRCO), resulted in the strengthening of our risk governance for risk management and reinforced the implementation and review of risk programmes, policies, and procedures.

Value of strengthening the risk governance across organisation	e which includes ensuring that there are robust processes
Strengthening and establishing a new Compliance Framework	

To date, our corporate compliance has successfully attained a Level 3-Established Rating in 10 of the 24 components of the Compliance Maturity Framework. For 2021, we are targeting to attain Level 3-Established Rating for all 24 components.

Anti-Bribery and Anti-Corruption

In line with our UI.EP values, we have adopted a Zero Tolerance Policy towards bribery and corruption and a No Gift Policy. This is reflected in our Group-wide Anti-Bribery and Anti-Corruption (ABAC) and Gifts, Donations and Sponsorships Policies respectively.

ABAC Policies

Axiata's ABAC Policy governs the Group's internal and external stakeholders' practices in conducting business for and on behalf of the Group. The Policy addresses:



Training & Awareness

As part of fostering a strong risk and compliance culture, the Group carried out several interactive initiatives and training and awareness sessions to engage and inform the staff throughout the year:

Townhall sessions reinforcing our UI.EP values, whistleblowing and consequence management ABAC Introductory Training Module mandatory for all employees Groupwide Banners, posters and regular email messages to increase awareness among staff on ABAC Policies and our Zero Tolerance Policy

We have achieved over 90% Group-wide completion rate for the ABAC Mandatory training module.

Governance

Business Ethics And Compliance

Whistleblowing (Speak Up) Channel

We are committed to upholding the highest standards of lawful and ethical conduct, by demonstrating honesty, fairness and accountability in all our conduct and dealings. In this regard, our Whistleblowing Policy enables all our employees, vendors and stakeholders to speak up in an independent and unbiased manner through our Speak Up Channel without the fear of reprisal to alert the Group of any breaches, suspected misconduct or violation of any of our policies, procedures or applicable laws and regulations by the Group's employees. The Speak Up Channel is accessible by internal and external parties to raise their complaints or provide information in confidence.

Speak Up Channel

- A central, unified platform across the Group and OpCos to enhance governance, transparency, integrity and management of whistleblowing cases
- Available in all local languages of our operating markets
- Anonymous channel managed by an independent third-party service provider, under the administration of the Group Chief Internal Auditor

Tax Transparency

As a Group, we contribute to the nation-building efforts and socioeconomic development of the jurisdictions in which we operate. We achieve this both directly through our investments in local communities (refer to the Society section in the Social chapter of this Report) as well as indirectly through taxes paid whereby these funds can be utilised by the Government in their initiatives to help local communities.

We have tax teams in each of the countries where we operate to ensure taxes are paid in accordance with local laws and regulations. The team reports its annual tax contributions in our National Contribution Report and our Group Financial Statements. The Audit Committee of the Board deliberates and approves Axiata's financial reporting, including the review of tax matters that are material to the financial statements.

In 2020, Axiata paid USD1.3 billion direct and indirect taxes and fees to the governments of all countries where we operate.

SNCR For further disclosure on our country-by-country tax contributions, refer to our National Contribution Report 2020 on page 85



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Data Privacy

As a digital company, we recognise that our customers, employees, and other stakeholders' data privacy is paramount, and we ensure it is handled with the highest level of respect, due care and diligence in line with our robust Group-wide data privacy practices.

Impact of COVID-19 on Industry Digital Risk Management

The spike in cyber risks globally demanded enhanced identification and remediation of external threats and cyber security capabilities. Digital users are required to be more vigilant to phishing attacks, fraud, and scams surrounding pandemic information and assistance, requiring a mindset change towards stronger cyber resilience and privacy awareness.

APPROACH

In view of the heightened risks of data breach, we continue to strengthen and ensure due care and diligence when dealing with personal data. Data privacy is overseen by the Board Risk and Compliance Committee, supported by the Risk and Compliance Department. Each of our OpCos has also appointed a Data Privacy Officer (DPO) responsible for enhancing their respective data privacy capabilities.

OUTLOOK

With the completion of Phase One, we will continue to execute Phase Two of the Privacy Programme with focus on implementing automated privacy solutions to improve our business operations and maintain the strictest vigilance, enhance our monitoring activities, and strengthen oversight of vendors' data-handling activities.

The Cyber Security Programme focused on building a strong foundation and implementing common standards and processes in DT2020. The next three-year strategy from 2021 will focus on evolving our security programme - a value creation function by ensuring we are right-sized, collaborative, future-fit, cost-conscious and making datadriven decisions on enabling business agility.

GAFS More details can be found in the "Building Digital Trust Through Data Privacy and Cyber Security" section on page 37 of GAFS 2020

Data Privacy Strengthened Through Our Privacy Commitment

RANSFER

Our Privacy Commitment is based on the principles of T.R.U.S.T, a commitment that emphasises the Group's standing as a trusted regional digital telecommunications and digital services provider. These principles articulate Axiata's Privacy Commitment to embed strong security and privacy governance in our technology, processes, and people.



PERSONAL DATA and will take appropriate steps to ensure it is adequately protected.

Governance

Data Privacy

Data Privacy Strengthened Through Our Privacy Commitment (cont'd)

Our position reaffirms our utmost commitment to developing a more resilient data privacy ecosystem that protects and respects customers, employees, and other stakeholders' privacy. In 2020, Axiata published the Group Data Privacy Policy and Privacy Notices for customers on its website to raise their awareness of data privacy issues.

In 2020, we embarked on the Privacy Programme's implementation phase to enhance data protection capabilities across our operations. We continuously embed privacy across all the Group's business facets. We built on our capabilities to further improve our privacy posture by strengthening our governance policies and monitoring activities, ensuring efficient oversight and privacy risk management.

This phase of the programme also saw the successful roll out of a mandatory training and awareness programme Group-wide to all employees as well as vendors processing critical assets and personal data. As we maintained our standards and best practices, we achieved a 90% overall completion rate. We successfully upskilled our Privacy Community members through an annual certification training of the Certified Information Privacy Manager (CIPM) Certification.

To ensure regulatory compliance is upheld throughout the Group's business processes, we will continue to demonstrate the strictest vigilance and conduct due diligence exercises over our vendors' data-handling processes and activities.

Our employees, vendors, and business partners must comply with data privacy and cyber security compliance standards and adopt our Code of Conduct.

Strengthening Cyber Security Programmes and Technologies

While technology advancements continue to breed cyber risks, we have also leveraged advanced technology to elevate our cyber capabilities. Through advanced technology tools such as Machine Learning and Artificial Intelligence (AI), we have ensured that we remain relevant and agile in measuring our risks. We have also improved our cyber capabilities and agility by adopting Robotic Process Automation to enhance and expand operational tasks to cover vendor resources' shortfall during the pandemic. Furthermore, we have adopted more automation and data driven analytics in our activities to improve our response time, reduce cost, maintain consistency and repeatability of common activities.

Employee Code of Conduct

Updated our Employee Code of Conduct details, Axiata's cyber security and data privacy requirements, and underlined the Group's commitment to these areas

Supplier Code of Conduct

To further enhance third-party data processing by our vendors, we reviewed our Supplier Code of Conduct to include the Group's expectations on vendor obligations in processing stakeholders' data and information

In our continuous path to inspire digital confidence and trust, we have plans that will further enhance our data governance. In markets with Data Protection Laws, the aim is to ensure that the relevant OpCos are in full compliance with prevalent laws and regulations. While in those OpCos where Data Protection Bills are being drafted into laws, the focus is on ensuring adequate compliance readiness is in place. We will further employ automated privacy solutions to support our business operations.

As part of our efforts to detect cyber threats, we have also expanded our Group Security Operations Centre (GSOC) capabilities. GSOC has been effective in providing consistent monitoring and timely updates on internal and external threats. Additionally, we have established internal teams of professional white hat hackers and conducted several crisis simulation exercises across the Group to test and improve our incident response.

Governance

Data Privacy

Strengthening Cyber Security Programmes and Technologies (cont'd)

Cyber security training and awareness for our employees **Working From** Cyber assessments were conducted across all OpCos Home during the work from home implementation to ensure our network adjustments for the new norm maintained the level of security for our networks and services. The assessment resulted in improvements to controls, better awareness among staff, and tightening of remote access systems. We also increased employee awareness on securing home WiFi access. cautioned the use of public WiFi, and provided guidelines for conducting virtual meetings securely. Phishing, Malware Conducted phishing, malware and ransomware and Ransomware related awareness to appraise employees on trends of attackers during the pandemic, including malicious links on topics dealing with COVID-19 recovery, statistics. and medical news. Furthermore, we conducted phishing simulation exercises to test the effectiveness of these programmes, the results showed an overall improvement in employee awareness.

Training and awareness initiatives have improved in 2020 with the adoption of a Group-wide training platform with curated material for cyber security based on internal policies and standards with current best practices to build an informed workforce. The coverage and completion of training modules across the Group stood at greater than 90% for the year.

Cyber security awareness for our digital telcos customers

General Security
Awareness
for customer/
subscribers

We published awareness information on our digital telcos websites to help raise and build awareness with our customer on cyber threats (phishing, financial and commercial scams, fake online shopping scams, and social engineering scams on their mobile services). In measuring our progress and effectiveness of programmes and initiatives, we apply these standards:

National Institute of Standards and Technology (NIST) Cyber Security Framework

- Internationally recognised cyber security maturity framework
- Identifies key cyber security functions and improves our ability to detect and respond to incidents. Axiata's 2020 aggregated NIST maturity index at 3.5 on a 5-point scale now exceeds the world average of 3.2

Minimum Baseline Security Standard (MBSS)

- Enforced Group-wide on all our IT and telecoms systems, our assets are hardened by default to a level that reduces the risk of attack and failure
- Improved to MBSS Version 2.0, inclusive of 91 standards and introduced automation to achieve scale and consistency

Axiata's cyber security strategy will leverage on, and evolve from, our existing DT2020, to Digital Trust and Resilience 2023 (DT&R2023) to provide a competitive differentiator that continues to build customer trust. DT&R2023 will be a coherent, defensible cyber security programme based on a clear vision and strategic goals.

DT&R2023

Our Vision:To inspire trust and confidence in Axiata as The Next Generation Digital ChampionOur Mandate:To secure information assets against cyber threats across the Group, in line with
Axiata 5.0 Strategy

2021

Converge common capabilities and introduce a risk-based approach 2022 Enhance the capabilities by focusing on automation 2023

Scale those capabilities to monetise

The next three years will be focused on helping our businesses to address the impacts of the global pandemic and proactively transition to the next new normal by continuously discovering, assessing, and adapting to ever-changing risks and trust levels.

Governance

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Regulatory And Political Risk

Operationally, we have long recognised the importance of regulatory and political risks in our business due to conditions in the markets where we are present, which have historically shown a propensity for uncertainties in their regulatory and political landscapes. In light of this, we took appropriate steps to improve our response to these risks. This has also been in response to feedback from our internal and external stakeholders who raised the need to strengthen our mitigation and enhance disclosure of our risks.

Regulatory Risk

The industry we operate in remains highly regulated by a broad range of telecom regulations. In some markets, these regulations may also be uncertain or subject to change as the markets mature. Major regulations that we are required to comply with include core operating licenses, spectrum usage, subscriber registration and tariff approvals. Additionally, we are subject to telco-related taxes and levies imposed across the Group by relevant telco regulatory bodies, which include service taxes, excise duties and Value Added Tax (VAT).

These regulations create uncertainties on our operations and may impair business returns and long-term growth prospects, in addition to limiting our flexibility to respond to market conditions, competition and new technologies.

To mitigate this risk, the Group Regulatory team has established a regulatory compliance framework to provide a more structured approach in monitoring regulatory compliance at Group level and across its subsidiaries. In addition to this, dedicated subject matter experts were appointed at Group level and across all OpCos to monitor regulatory compliance.

Externally, we collaborate with other telco industry players to represent one voice in advocating strict compliance, fair and transparent policies in addition to knowledge sharing of best practices. We also conduct close engagement and active participation in regulatory and government officials' dialogues to anticipate emerging regulations, address and highlight concerns/obstacles/challenges that telco players may face. Additionally, we engage with regulatory officials in implementing sustainable regulatory regimes that will lead to the development of healthy regimes for the telecoms sector and participate in government consultations and industry association events to foster collaboration and knowledge sharing for best industry policies and practices.

Supported by these measures, we were able to improve our regulatory compliance monitoring and insights during the year. This enabled greater agility in adopting and adapting to adverse changes in the regulatory landscape.

Political Risk

The markets we operate in are prone to political instabilities, civil unrest and other social tensions which may cause business disruption, exposure to adverse changes in the regulatory landscape, and uncertainty of policy making. These may undermine market sentiment and investor confidence.

Our mitigation of these risks focuses on collaborating with all our OpCos to track the development of risks, including geopolitical tensions which may arise, leveraging on their local expertise, local familiarity, and connections to assess changing scenarios continually. In ensuring business resilience amidst any instability, all OpCos are equipped with a comprehensive Business Continuity Plan (BCP) to be activated when a crisis is triggered.

To manage and maintain good relationships with the broader stakeholders, we adopt a neutral stance towards politics and foster healthy relations with the governments of the day. To further demonstrate our long-term commitment to the markets, we also contribute to the country's wellbeing through various CSR programmes that contribute to socioeconomic development.

For 2020, our efforts in political risk mitigation have resulted in better monitoring processes of key political and geopolitical events as well as improvements in anticipating emerging risks.



05

Tina Salleh Head of Sustainability Celcom Axiata

I believe in buying local and ethically-sourced products.

#ItBeginsWithMe

NATIONAL CONTRIBUTION REPORT

Axiata Group Berhad

Introduction

As a leading regional telecommunications Group with a presence in 11 countries and a customer base of approximately 157 million, Axiata makes a substantial contribution to the countries in which the Group operates. Through its investments in its portfolio of operating companies across the region, Axiata is recognised as one of the largest Foreign Direct Investors, best employer, significant taxpayer and substantial purchaser of local services where it has a digital telecommunications presence.

Over the past seven years, Axiata has published an annual National Contribution Report to continuously measure the economic impact and value creation in the markets and communities served. Our national

contributions represent the long-term value we have created through our investments in the local telecommunications industry, network infrastructure, talent development, environmental conservation and in society. In 2020, we added edotco into our national contribution study as we enhance our level of disclosure of the contributions we have provided to the countries in which we operate.

The 2020 National Contribution Report (NCR2020) should be read in tandem with Axiata's Integrated Annual Report and the Sustainability Report to understand the context in which we operate and our holistic value-creation initiatives.

Report scope and information of the NCR2020

This report consists of economic impact assessment for seven OpCos, including:

- Celcom (Malaysia)
- XL (Indonesia)
- Dialog (Sri Lanka)
- Robi (Bangladesh)
- Smart (Cambodia)
- Ncell (Nepal)
- edotco (Bangladesh, Cambodia, Laos, Malaysia, Myanmar, Pakistan, Philippines, Sri Lanka)

For each OpCo, the report presents the economic and financial assessment of Axiata Group and its subsidiaries' contributions to national economies.

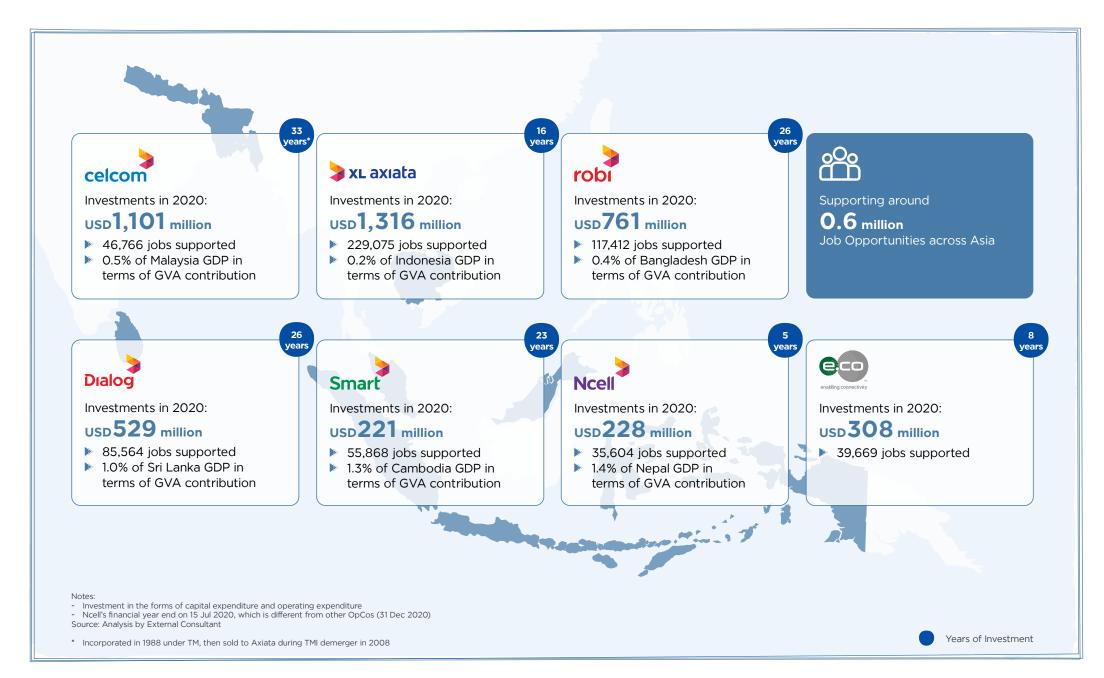


Highlights of the National Contribution Report 2020

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:



Achievements Across The Group



National Contributions During COVID-19

Acti	vities	Country	
1	Provided free 1GB/day of data, WhatsApp and O365 from 8am-6pm valued at over RM35 million.		حم TOTAL GVA CONTRIBUTION:
2	Support in-kind and cash of over RM497,754 to the government in services, devices, donations, PPE and enhanced network capacity in critical sites have also been provided.		EMPLOYMENT SUPPORTED:
3	Sponsored around RM486,692 in total, comprising PPEs to front-liners and donations for food and basic necessities for the urban poor.	(*	3,486
4	Launched RM150 million cash fund for micro-SMEs in Malaysia.		Value-added and employment contributions
5	Allocated USD633,000 to date on a USD1 million COVID-19 Relief Fund and 5G technology at 3 main hospitals treating COVID-19 patients.		Through these activities initiated by Axiata, the GVA contributions, (whether direct or indirect) amount to USD51 million in total. This estimated GVA occur to the economies in which the activities take
6	NPR100 million to Nepal Government Prevention Fund & developed a service to identify COVID-19 infections.		place, namely Malaysia, Cambodia, Nepal, Indonesia, and Sri Lanka. These activities then help to support 3,486 jobs.
7	Contributed IDR10 billion to Indonesian Natural Disaster Bureau.		
8	Invested IDR85 billion to date in 2GB free internet data for all users.		Source: Analysis by External Consultant
9	Contributed RS50 million to provide relief to the needy by distributing packages of dry rations to villages.		

Malaysia

Celcom is Malaysia's first private mobile operator, with over 8.7 million customers. Established in 1988, it's national 2G, 3G and 4G LTE networks cover over 98% of the population. Celcom is now moving towards integrated multi-access and multimedia services and Internet of Things solutions, in line

with evolving technologies and consumer behaviour in Malaysia. A culture that places the customer FIRST[™] is reflected in our award-winning customer service, products, and other corporate accolades at a regional level.

Contribution to Gross Value Added USD1,760 million¹ (0.5% of the Nation's GDP) Operational Direct GVA: Operational Indirect and Induced GVA: USD805 million USD767 million • Celcom's total Gross Value Added (GVA) contribut reached USD1,760 million¹, accounting for 0.5% of • Celcom's operations directly and indirectly con accounting for 89% of total contribution • A further USD189 million GVA was generated by accounting for 11% of total contribution	f the national GDP in 2020 tributed USD1,571 million ² ,	Expenditure reached USD1,101 m 2020, with Capital Expenditure rec	llion Dperating illion in	Every USD1 spent on capex translates to: USD7.5 GVA Contribution For every USD1 Celcom spent in Malaysia through its capital investment, it added USD7.5 GVA to the Malaysia economy in 2020	
Direct Employees Image: Complex State 2,444 Image: Complex State Female: Malaysians: 46% 99.5% • 2,444 staff were directly employed by Celcom in 2020 • Around 46% of total employees were women, higher than the national level recorded at 39% ³ • Malaysian citizens accounted for 99.5% of total employees • Malaysian citizens accounted for 99.5% of total employees	 2,444 34,2 Overall, Celcom suppor operations and capital in Celcom's operations dire accounting for 78% of to 	ted 46,766 jobs ⁴ in 2020 through its	USD18 (0.3% c governr Celco acco	bution to Public Finance 39 million of total tax revenue of the Malaysian federation ment) om contributed USD189 million in tax punting for 0.3% of total tax revenue of the ysian federal government ⁵	,

- ¹ Totals may not add up due to rounding
- ² Totals may not add up due to rounding
- ³ Source: Department of Statistics, Malaysia, Q4 2020
- ⁴ Totals may not add up due to rounding
- ⁵ Total tax revenue for the federal government in 2020 estimated at RM227 billion (USD54 billion). (Source: Malaysia Treasury)



Celcom's total economic contribution to the Malaysian economy

Celcom's substantial operations and investments in Malaysia continued to contribute close to USD1.8 billion to Malaysia's GDP in 2020. With a total operating expenditure of USD867 million and capital investment of USD234 million, Celcom's total Gross Value Added (GVA) contribution to Malaysia's economy was estimated at USD1,760 million in 2020, accounting for 0.5% of national GDP.

Celcom's operations directly contributed USD805 million, accounting for 46% of total GVA contribution. It also indirectly contributed USD767 million through the inputs it purchased from local suppliers. This indicates that for every USD1 Celcom directly added to Malaysia's economy, it generated just under another USD1 indirectly through purchasing goods and services from Malaysian suppliers.

USD189 million GVA was generated by Celcom's capital investment, accounting for **11%** of total contribution. (Figure 1)

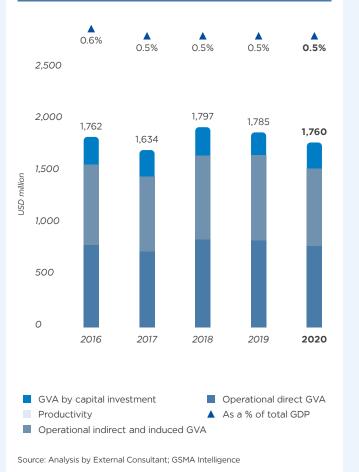


Source: Analysis by External Consultant; OECD 2011

Celcom's total economic contribution over the last five years

Celcom's total GVA contribution **remained largely stable from USD1,762 million in 2016 to USD1,760 million in 2020** representing a share of the country's GDP of about **0.6% to 0.5%**. (Figure 2)

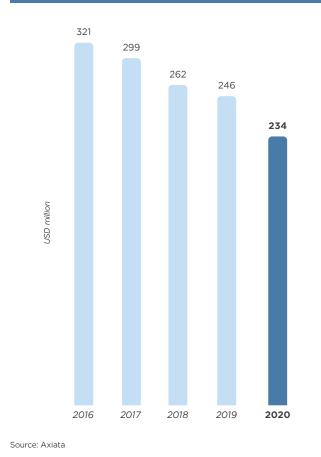
Figure 2: GVA contribution to the Malaysia economy 2015-2020



Investing and innovation for the long term

Total **accumulated capital investment** by Celcom over the last five years **reached USD1,363 million**. In 2020, Celcom continued to make significant investments of USD234 million. This continuous investment supports Celcom's long-term development, and ongoing significant contribution to the Malaysian economy. (Figure 3)

Figure 3: Total capital investment 2016-2020



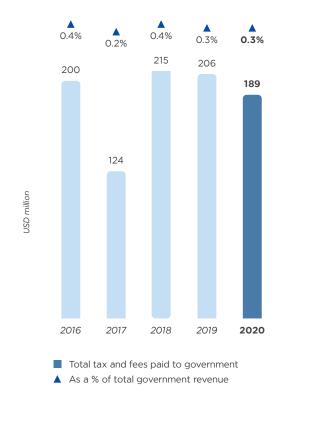
Malaysia

Contributions to public finance

Total **accumulated tax contributions** to public finance over the last five years reached **USD934 million**.

In 2020, Celcom contributed **USD189 million in tax,** accounting for 0.3% of total tax revenue of the Malaysian federal government. (Figure 4)

Figure 4: Total tax contribution to public finance 2016-2020

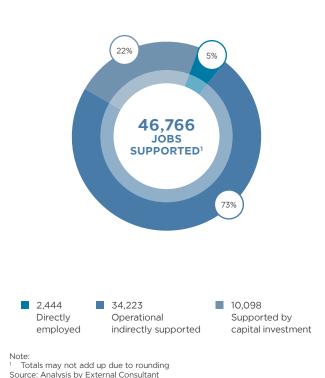


Total employment impact

Celcom directly **provided 2,444 jobs** in 2020. The firm was predominantly run by Malaysian citizens with **99.5% of total employees being Malaysian**. Around **46% of Celcom employees were female**, higher than the national level recorded at 39%.

Celcom's operations indirectly supported **an additional 34,223 jobs** in Malaysia through its suppliers and a further 10,098 jobs were supported by Celcom's capital investments. The total number of employees supported increased from 45,743 in 2019 to 46,766 in 2020. (Figure 5)

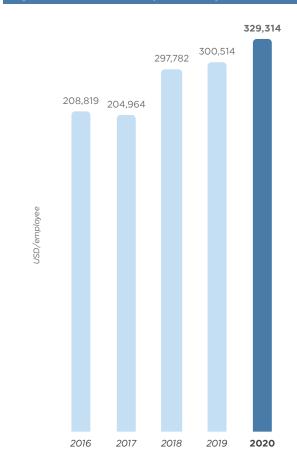
Figure 5: Total employment impact 2020



Celcom's labour productivity over the last five years

Celcom's productivity, measured as Gross Value Added (GVA) per employee, reached USD329,314 in 2020, representing a CAGR of 12.1% from USD208,819 in 2016. Celcom's productivity increased by 9.6% in 2020. (Figure 6)

Figure 6: Celcom's labour productivity 2016-2020



Source: Axiata and Analysis by External Consultant

Indonesia

XL is the second largest telecommunications company in Indonesia by market capitalisation. It offers an array of innovative telecommunications products and services ranging from voice, SMS, Value Added Service (VAS) to mobile data covering more than 90% of the population throughout Indonesia with over 57 million subscribers. With over 20 years' experience, XL is credited with providing middle and lower-income groups access to cellular services. XL continues to innovate and transform itself into a leading mobile data provider to serve the burgeoning demand for data amongst Indonesians.

Contribution to Gross Value Added	Little	Capital + Operating Expenditure	r		
USD2,315 million1 (0.2% of the Nation's GDP) Operational Direct GVA: Operational Indirect and Induced GVA: Capital In GVA: USD987 million USD903 million USD38 * XL's total Gross Value Added (GVA) contribution to the USD2,315 million1, accounting for 0.2% of the total of 82% of total GVA contribution State of the total of the total of the total of the total of total GVA contribution * A further USD382 million was contributed by XL's can 16% of total GVA contribution State of total GVA contribution * Contribution from productivity improvement was US of the total GVA contribution State of the total GVA contribution	USD424 million USD892 XL's total Capital and Operating reached USD1,316 million in 202 Expenditure recorded at USD424	USD424 million USD892 million XL's total Capital and Operating Expenditure reached USD1,316 million in 2020, with Capital Expenditure recorded at USD424 million (32%) and Operating Expenditure at USD892 million			
Direct Employees	Total Jobs Supported 229,075		USD 117		() () () () () () () () () () () () () (
Female: Indonesian: 30% 99% 1,594 staff were directly employed by XL in 2020 Around 30% of total employees were women Indonesian citizens accounted for 99% of total employees	and capital investments	Capital Investment: 114,221 075 jobs in 2020 through its operations supported 1,594 jobs and indirectly	governmen XL cor accounti	total tax revenue of Indonesia t) htributed USD177 million in ta ng for 0.2% of total tax revenue of th hent of Indonesia ⁴	х,

Notes:

- ¹ Totals may not add up due to rounding
- ² Totals may not add up due to rounding
- ³ Including GDP contribution from market penetration related productivity impact
- ⁴ Total government tax revenue was Rp1,363 trillion (USD93.9 billion). (Source: Finance Minister's update based on unaudited state budget realisation)

91

Indonesia

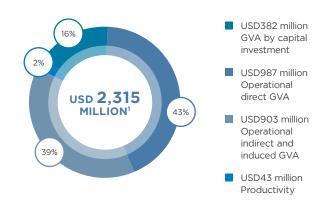
XL's total economic contribution to Indonesian economy

Led by XL's total operating expenditure of USD892 million and capital investment of USD424 million, the company's total Gross Value Added (GVA) contribution to Indonesia's economy was USD2,315 million, accounting for 0.2% of national GDP.

XL's operations **directly** contributed **USD987 million**, accounting for **43%** of total GVA contribution. **Another USD903 million was indirectly generated** through the expenditures by XL's suppliers. For every USD1 XL contributed directly to Indonesia's economy, another **USD0.9** was generated indirectly through local suppliers.

A further **USD382 million** was contributed by XL's capital investment with a share of 16% of total GVA contribution. GVA contribution from productivity improvement was estimated at **USD43 million**, accounting for 2% of total GVA contribution. (Figure 1)

Figure 1: GVA contribution to the Indonesia economy in 2020



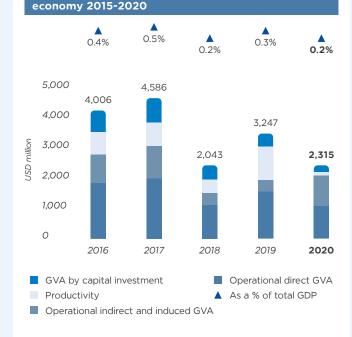
Note: ¹ Totals may not add up due to rounding Source: Analysis by External Consultant; Statistics Indonesia 2010

XL's total economic contribution over the last five years

XL's total GVA contribution increased from USD4,006 million in 2016 to USD2,315 million in 2020. In 2018, the contribution decreased to USD2,043 million, mainly due to **a drop in the national mobile subscriptions** as a result of the new **national SIM card registration decree**. For 2018's contribution, productivity increase from fixed broadband penetration was included. The GVA contribution from productivity improvement was **USD318 million** in 2018.

In 2020, total GVA contribution **fell to USD2,315 million**, driven by the fall in productivity-impact GVA contribution as well as reduced capital investment as compared to 2019, against a backdrop of the COVID-19 pandemic. (Figure 2)

Figure 2: GVA contribution to the Indonesian

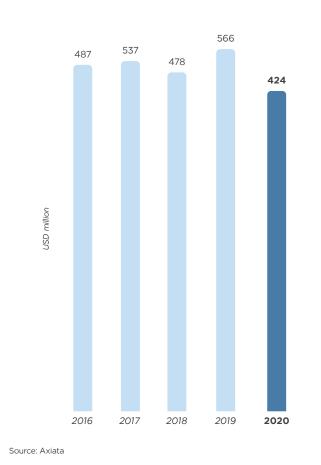


Source: Analysis by External Consultant; GSMA Intelligence; EIU

Investing and innovation for the long term

Total **accumulated capital investment** by XL over the last five years **reached USD2,491 million**. In 2020, capital investment **decreased by 25.1%** from USD566 million to USD424 million. Over 2016 to 2020, capital investment fell from USD487 million to USD424 million. (Figure 3)

Figure 3: Total capital investment 2016-2020



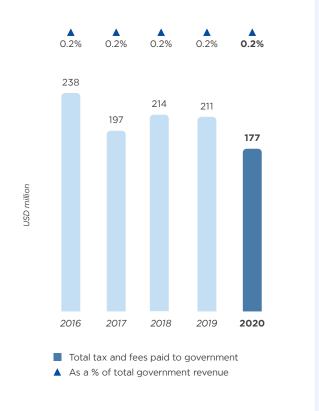
Indonesia

Contributions to public finance

Total accumulated tax contributions to public finance over the last five years reached USD1,038 million.

Annual tax contribution was relatively stable over the last five years. In 2020, it contributed **USD177 million, accounting for 0.2%** of total tax revenue of the government of Indonesia. (Figure 4)

Figure 4: Total tax contribution to public finance 2016-2020



Total employment impact

XL directly **provided 1,594 jobs** in 2020. **99% of total employees** were Indonesian and around **30% of XL employees were women**.

A further **113,260 jobs** were supported indirectly by its operations. XL's capital investment supported **114,221 jobs**. (Figure 5)

Figure 5: Total employment impact 2020

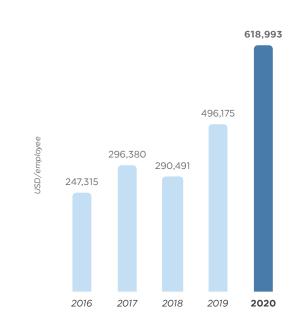
1,594 Directly employed

XL's labour productivity over the last five years

XL's productivity, measured as Gross Value Added (GVA) per employee, reached **USD618,993** in 2020. It **grew by a CAGR of 25.8%** from USD247,315 in 2016. Shrinking employment with relatively stable operating profits supported the growth in productivity. Total number of employees reduced by 16% from 1,892 in 2016 to 1,594 in 2020.

A sudden increase in labour productivity was observed in 2019, driven mainly by the reduction of outsourced employees. In 2020, another increase in labour productivity was observed. This is due to the operating revenues remaining relatively stable from 2019 to 2020 whilst operating expenditures fell by 17%. (Figure 6)

Figure 6: XL's labour productivity 2016-2020



Source: Axiata and Analysis by External Consultant

Source: Analysis by External Consultant

Source: Analysis by External Consultant



Sri Lanka

Dialog operates Sri Lanka's largest and fastest growing mobile telecommunications network serving over 16 million customers. One of the largest companies by market capitalisation listed on the Colombo Stock Exchange, Dialog represents Sri Lanka's largest Foreign Direct Investment. Dialog has

been at the forefront of innovation in the Sri Lankan mobile industry since the late 1990s, delivering advanced mobile telephony and high speed mobile broadband services, Fixed Telecommunications, and Digital Pay Television through its fully-owned subsidiaries.

	Contribution to Gross Value Added USD 817 million1 (1.0% of the Nation's GDP) Operational Direct GVA: Operational Indirect and Induced GVA: USD 331 million USD 340 million Dialog's total Gross Value Added (GVA) contribution reached USD 817 million1, accounting for 1.0% of total Dialog's operations directly and indirectly contributed for 82% of total GVA contribution Capital investments contributed USD 146 million, reference	USD155 million USD374 million USD374 million Dialog's total Capital and C Expenditure reached USD529 million with Capital Expenditure recorded at	Capital Expenditure: USD155 million Dialog's total Capital and Operating Expenditure reached USD529 million in 2020, with Capital Expenditure recorded at USD155 million (29%) and Operating Expenditure at Every USD1 Spent on capex USD5.3 GVA Contribution For every USD1 Dialog in Sri Lanka through its		<u></u>		
total GVA contribution Direct Employees B Total Jobs Supported Image: Contribution to Public Finance	total GVA contribution Direct Employees	Total Jobs Supported	Ē		oution to Public Finance	® ® 0110	
Female: Sri Lankan: 23% 99.6% • 2,733 staff were directly employed by Dialog in 2020 Directly Operational indirectly supported: Supported by Capital Investment: Outsourced individuals: 676 • Around 23% of total employees were women • Overall, Dialog supported 85,564 jobs² in 2020 through its operations and capital investments 0 0	Female: Sri Lankan: 23% 99.6% • 2,733 staff were directly employed by Dialog in 2020 • Around 23% of total employees were women • Sri Lankan accounted for 99.6% of total	 Directly Employed: 2,733 Overall, Dialog supports operations and capital interest operations directly supported 33,538 	corted: Capital Investment: individuals: 48,616 676 ed 85,564 jobs ² in 2020 through its vestments ctly supported 2,733 jobs and indirectly	(1.2%) governr Dialco acco	 government) Dialog contributed USD101 million in tax, accounting for 1.2% of total tax revenue of the 		

² Totals may not add up due to rounding

³ Source: Total government tax revenue in 2020 was LKR1.62 trillion (USD8.7 billion). (Source: Ministry of Finance, Sri Lanka)



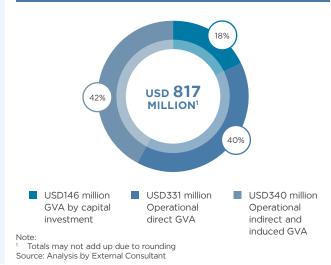
Dialog's total economic contribution to the Sri Lanka economy

Dialog's substantial operational activities and capital investment contributed significantly to the Sri Lanka economy in 2020. Led by Dialog's total **operating expenditure of USD374 million and capital investment of USD155 million**, the Dialog's total Gross Value Added (GVA) contribution to Sri Lanka's economy was **USD817 million** in 2020, accounting for **1.0% of national GDP**.

Dialog's operations directly contributed USD331 million, representing a share of 40% of total GVA contribution. Another USD340 million was indirectly generated through the expenditures by Dialog's suppliers, accounting for 42% of total GVA. For every USD1 Dialog contributed directly to the economy, another USD1 was generated indirectly through local suppliers.

Dialog's capital investment contributed a further USD146 million with a share of 18% of total GVA. (Figure 1)

Figure 1: GVA contribution to the Sri Lankan economy in 2020



Dialog's total economic contribution over the last five years

Dialog's total GVA contribution **fell by a CAGR of 4.4% from USD978 million to USD817 million** over the last five years. The contribution accounted for **1.0%** of the nation's GDP in 2020.

Sri Lanka's mobile subscription shrunk by 12.6% from 32.9 million in 2019 to 28.7 million in 2020, representing a fall in national mobile penetration rate from 151% to 131%. (Figure 2)

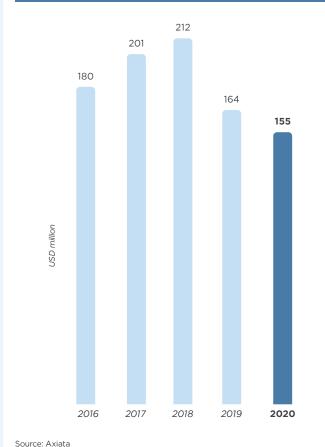


Source: Analysis by External Consultant; Telecommunications Regulatory Commission of Sri Lanka

Investing and innovation for the long term

Dialog's total accumulated capital investment reached USD913 million over 2016-2020. Capital Investment was USD155 million in 2020. Continuous capital investment supports Dialog's long-term development and contributes to the growth of the Sri Lankan economy. (Figure 3)



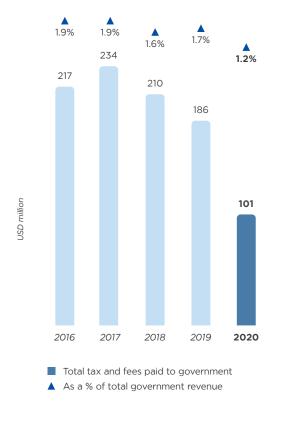


🗂 🛛 Sri Lanka

Contributions to public finance

From 2016 to 2020, Dialog has contributed **USD948 million** of taxes and fees to public finance. Annual tax contributions decreased over the period from USD217 million in 2016 to USD186 million in 2019. This decreased sharply to **USD101 million in 2020**. This **represents 1.2%** of total tax revenue of Sri Lanka's government. (Figure 4)

Figure 4: Total tax contribution to public finance 2016-2020





Total employment impact

Dialog's direct operations generated **2,733 jobs** in 2020. **23%** of the total employees were female. Dialog was dominated by Sri Lankan as **99.6%** of total employees were locals.

A further **33,538 jobs** were supported indirectly by Dialog's operations. Its capital investment supported **48,616 jobs**. (Figure 5)

Figure 5: Total employment impact 2020

1% 39% 85.564 JOBS SUPPORTED¹ 57% 2.733 33.538 Directly Operational indirectly supported employed 48.616 676 Outsourced Supported by capital investment

¹ Totals may not add up due to rounding Source: Analysis by External Consultant

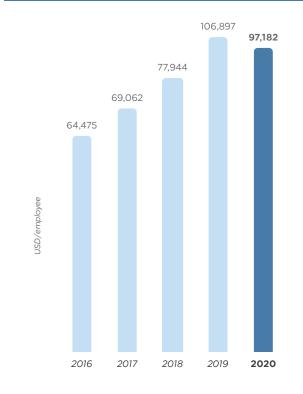
Note:

Dialog's labour productivity over the last five years

Dialog's productivity, measured as Gross Value Added (GVA) per employee, grew by a CAGR of 10.8% from USD64,475 in 2016 to USD97,182 in 2020.

In 2019, there was a significant increase in labour productivity due to a sharp drop in employment whilst operating profit was relatively stable. Total number of employees (including outsourced) reduced by 28% from 4,095 in 2018 to 2,933 in 2019. In 2020, the number of direct employees was 2,733. (Figure 6)

Figure 6: Dialog's labour productivity 2016-2020



Source: Analysis by External Consultant

Bangladesh

Robi is the second largest mobile network operator in Bangladesh, serving more than 50 million customers. An industry leader in rolling out innovative and new solutions, it was the first operator to introduce GPRS, 3.5G services and the first to launch 4.5G service in all the 64 districts of the country. By the end of 2018, Robi created the largest 4.5G network in the country with nearly 8,910 sites covering 93% of the country. It is the only mobile operator to have successfully conducted the trial run of 5G and Voice over LTE technology on its 4.5G network.

	Contribution to Gross Value Added USD1,306 million (0.4% of the Nation's GDP)						
Operational Direct GVA:Operational Indirect and Induced GVA: USD 421 millionOperational Indirect and Induced GVA: USD 393 millionCapital Investment GVA: USD 281 millionProductivity GVA: USD 281 million• Robi's total Gross Value Added (GVA) contribution to the Bangladesh economy reached USD1,306 million, accounting for 0.4% of total national GDP in 2020Productivity GVA: USD 281 million• Robi's operations directly and indirectly contributed USD814 million, accounting for 62% of total GVA contributionCapital investments contributed USD281 million with a share of 22% of total GVA• Capital investments contributed USD281 million with a share of 16% of the total GVA				al Expenditure: 248 million bi's total Capital and Operating the USD761 million in 202 benditure recorded at USD243 d Operating Expenditure at U "%)	ng Expenditure 0, with Capital 8 million (33%)	Every USD spent on capex translates to: USD 5.3 GVA Contribution ¹ For every USD1 Robi spent in Bangladesh through its capital investment, it added USD 5.3 GVA to the Bangladesh economy in 2020	
Direct Employees 1,371		Total Jobs Supported	1	Ð	USD 501	on to Public Finance million otal tax revenue of the government	
Female: Bangladeshi: 99.9%			erational rectly supported:	Supported by Capital Investment:	Bangladesh		

fees to government, accounting for 1.1% of total tax revenue of the government of Bangladesh²

Notes

2020

total employees

¹ Including GDP contribution from market penetration related productivity impact

> 1,371 staff were directly employed by Robi in

Bangladeshi citizens accounted for 99.9% of

▶ 13% of total employees were women

² Total government tax revenue was BDT3.78 trillion (USD44.7 billion). (Source: Ministry of Finance, Bangladesh)

Employed: indirectly supported: 1.371 71.129

- Capital Investment: 44,912
- Overall, Robi supported 117,412 jobs in 2020 through its operations and capital investments
- Robi's operations directly and indirectly supported 72,500 jobs
- Robi's capital investment supported 44,912 jobs

Robi contributed USD501 million in total tax and

Bangladesh

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 USD513 million and capital investment of USD248 million, Robi contributed USD1,306 million to the economy of Bangladesh in 2020, accounting for 0.4% of national GDP.

Robi's operations directly contributed USD421 million, accounting for 32% of total GVA contribution. Another USD393 million was indirectly generated through the expenditures by Robi's suppliers. For every USD1 Robi directly added to Bangladesh economy, it generated just under another USD1 indirectly from local suppliers.

Productivity improvements contributed **USD211 million**, accounting for **16%** of total GVA. **Capital investment** contributed a further **USD281 million**, representing a share of **22%** of the total GVA. (Figure 1)

USD281 million

investment

USD421 million

Operational

direct GVA

USD393 million
 Operational
 indirect and
 induced GVA

USD211 million Productivity

GVA by capital

Figure 1: GVA contribution to the Bangladesh economy 2020

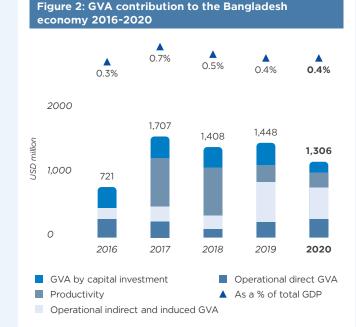


Note: ¹ Totals may not add up due to rounding Source: Analysis by External Consultant

Robi's total economic contribution over the last five years

Robi's total GVA contribution grew at a CAGR of 16.0% from USD721 million in 2016 to USD1,306 million in 2020, representing a 0.4% of the national GDP in 2020. However, GVA contribution for 2016 was unusually low, due to the absence of a productivity-impact GVA contribution. This arose due to 5.5% fall in national mobile subscription from 134 million in 2015 to 126 million in 2016. Looking at a six-year period from 2015 to 2020, Robi's total GVA contribution grew at a CAGR of 0.8% from USD1,253 million to USD1,306 million.

2016's total GVA contribution of USD721 million was a sharp drop compared to the 2019 contribution of USD 1,253 million. This was mainly due to the fluctuation of mobile penetration rate in Bangladesh.

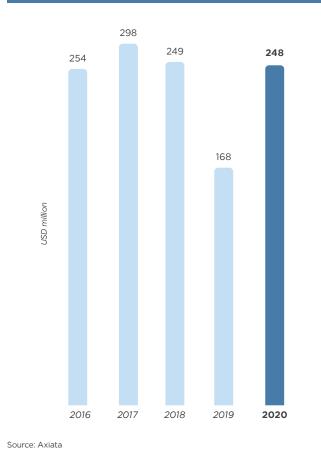


Source: Analysis by External Consultant; Bangladesh Telecommunication Regulatory Commission

Investing and innovation for the long term

Robi's capital investment was USD248 million in 2020. The total accumulated capital investment reached USD1,217 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 Bangladesh economy. (Figure 3)

Figure 3: Total capital investment 2016-2020



Bangladesh

Contributions to public finance

Total accumulated tax contributions to public finance over the last five years reached USD1,814 million.

Annual tax contributions in 2020 was USD501 million, accounting for 1.1% of total tax revenue of the government of Bangladesh. (Figure 4)

1.2%

1.1%

501

0.8%

Figure 4: Total tax contribution to public finance 2016-2020¹

1.5%

1.2%



1,371 jobs were directly provided by Robi's operations in 2020. 13% of Robi's employees were women. The firm is predominated by Bangladesh citizens with 99.9%.

Robi's operations also indirectly supported 71,129 jobs. A further 44,912 jobs were supported by its capital investment. (Figure 5)

117,412

JOBS

SUPPORTED

61%

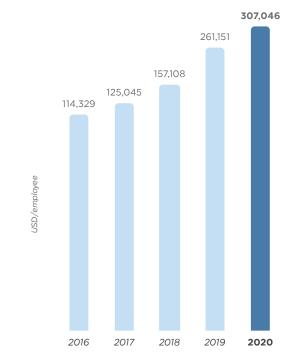
44,912

Figure 5: Total employment impact 2020

Robi's labour productivity

Robi's productivity, measured as Gross Value Added (GVA) per employee, increased by a CAGR of 28% to USD307,046 in 2020 from USD114,329 in 2016, mainly driven by decreasing employment number and increasing operating profits.

In 2019, Robi's productivity grew by 66.2% from USD157,108 per worker to USD261,151 in 2019, due to a 72.9% increase in operating profits from the previous year. In 2020, operating profit grew another 10.6%, boosting labour productivity by 17.6%. (Figure 6)



367 356 327 263 JSD million 2016 2017 2018 2019 2020 Total tax and fees paid to government ▲ As a % of total government revenue

Note:

Total government revenue numbers were updated based on the latest information available Source: Axiata and Analysis by External Consultant

Source: Analysis by External Consultant

71,129

Operational

indirectly supported

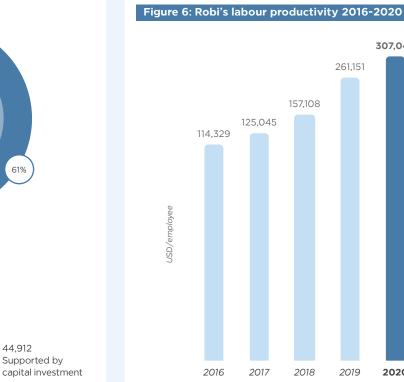
1,371

Directly

employed

38%

Source: Analysis by External Consultant





Cambodia

Smart Is Cambodia's leading mobile telecommunications operator, serving more than 7 million customers. Smart is at the forefront of mobile technology advancement in Cambodia with extensive national wide coverage of 99% of the population. As the first network to introduce 4G LTE in 2014, 4G+ in 2016, 4G+ with HD Voice (VoLTE) and 4.5G in 2017, subsequently in 2019 Smart hosted the first 5G live showcase in the Kingdom, manifesting its mobile data leadership position in the country. The company is also rapidly transforming itself into a digital lifestyle brand, having introduced many innovative offerings and lifestyle entertainment value propositions. Smart aspires to be the #1 and most loved communication tech brand in Cambodia by 2022, while having a strong corporate social responsibility and sustainability agenda for national socioeconomic growth.

Contribution to Gross Value Added USD 345 million ¹ (1.3% of the Nation's GDP)	USD221 million	
Operational Direct GVA: Operational Indirect and Induced GVA: Capital Investment GVA: USD191 million USD95 million GVA: Smart's total Gross Value Added (GVA) contribution to Cambodian ecor reached USD345 million, accounting for 1.3% of total national GDP in 2020 Smart's operations directly and indirectly contributed USD287 million accounting for 83% of total contribution A further USD58 million GVA was generated by Smart's capital investry accounting for 17% of total contribution	2020, with Capital Expenditure recorded at USD74 million (33%) and Operating Expenditure at USD148 million (67%) For every USD1 Smart spent in Cambodia through its capital investment, it added USD4.7 GVA to the Cambodian economy in	
36%97%Approximately 823 staff were directly employed by Smart in 2020Employed: 823Around 36% of total employees were womenOverall, Smart operations and operations Smart's operationCambodian citizens accounted for 97% of totalSmart's operation	Prational rectly supported: Supported by Capital Investment: 20,925 Proted 55,868 jobs ⁴ in 2020 through its Supported to the support of the support o	() () () () () () () () () () () () () (

- ² Totals may not add up due to rounding
- ³ The multiplier effect decreased from 5.0 in 2019 to 4.7 in 2020, mainly due to a decrease in productivity impact
- ⁴ Totals may not add up due to rounding

⁵ Total government tax revenue in 2020 was estimated at USD2.88 billion. (Source: Tax collections rise in 2020 despite COVID-19 pandemic, Cambodian Journalists Alliance Association, Jan 13, 2021)

* Smart¹'s 2020 financial numbers presented here in our National Contribution Report (pages 100-102) are pre IFRS 15

Cambodia

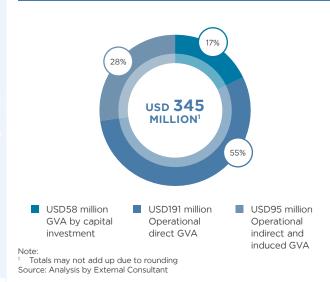
Smart's total economic contribution to the Cambodian economy

Smart's substantial operations and investments in Cambodia had a strong positive impact on the Cambodian economy in 2020. With a total operating expenditure of USD148 million and capital investment of USD74 million, Smart's total Gross Value Added (GVA) contribution to Cambodia's economy was estimated at USD345 million in 2020, accounting for 1.3% of national GDP.

Smart's operations **directly contributed USD191 million**, accounting for **55% of total GVA contribution**. It also indirectly contributed USD95 million to economic activity. For every USD1 Smart contributed directly to Cambodia's economy, another **USD0.5** was generated indirectly through local suppliers.

Capital investment contributed USD58 million, representing 17% of total GVA. (Figure 1)

Figure 1: GVA contribution to the Cambodia economy in 2020

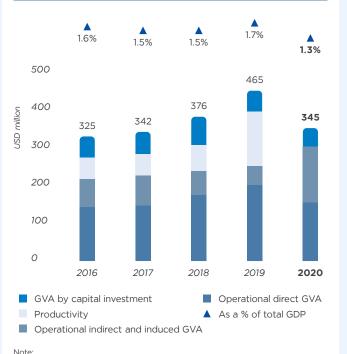


Smart's total economic contribution over the last five years

Smart's total GVA contribution **increased from USD325 million in 2016 to USD345 million in 2020** with a CAGR of 1.2%, representing a slightly decreasing share of the country's GDP from 1.6% to 1.3%.

With total number of mobile subscribers in Cambodia decreasing from 21.7 million in 2019 to 20.8 million in 2020, mobile penetration rate in Cambodia fell from 139% to 125%¹. This resulted in a decline in productivity-impact GVA contribution. (Figure 2)

Figure 2: GVA contribution to the Cambodian economy 2015-2020



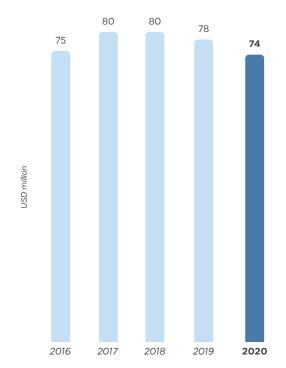
¹ Mobile subscription numbers from Telecommunication Regulator of Cambodia

Source: Analysis by External Consultant; Telecommunication Regulator of Cambodia

Investing and innovation for the long term

Total **accumulated capital investment** by Smart over the last five years **reached USD387 million**. In 2020, capital investment **fell by 5%** from **USD78 million to USD74 million**. Continuing capital investment supports Smart's development in Cambodia and makes a significant contribution to the Cambodian economy. (Figure 3)

Figure 3: Total capital investment 2016-2020



Note

- ¹ Capital investment refers to capital expenditure and excludes any spectrum related investments
- ² The capex values for Smart from 2016-2018 constitute procured capex, however from 2019 onwards we had standardized the methodology to include the use of booked capex values in our NCR analyses. Source: Axiata

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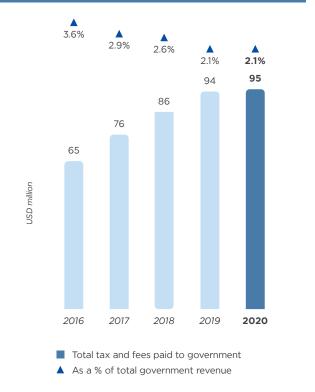
Cambodia

Contributions to public finance

Total **accumulated tax contributions** to public finance over the last five years reached **USD415 million**. Annual tax contributions have expanded from USD65 million in 2016 to USD95 million in 2020 with a CAGR of 9.8%.

In 2020, Smart contributed **USD95 million in tax, accounting for 2.1%** of total tax revenue of the Cambodian government, excluding regulatory related fees, levies and payments. (Figure 4)

Figure 4: Total tax contribution to public finance 2015-2020



Source: Axiata and Analysis by External Consultant

Total employment impact

Smart directly **provided 823 jobs** in 2020. Cambodian citizens accounted for 97% of total employees of the firm. Around **36% of Smart employees were women**.

Smart's operations indirectly supported **an additional 34,119 jobs** and a further **20,925 jobs** were supported by Smart's capital investments. (Figure 5)

55,868

JOBS SUPPORTED¹

2%

61%

20,925

Supported by

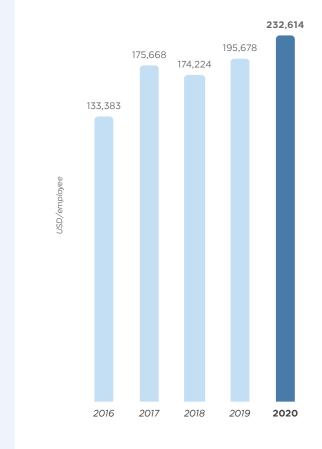
capital investment

Figure 5: Total employment impact 2020

Smart's labour productivity over the last five years

Smart's productivity, measured as Gross Value Added (GVA) per employee, **increased** from **USD133,383** in 2016 to **USD232,614** in 2020 **with a CAGR of 14.9%**. This is due to a rise in operating profit and a fall in employment over the same period. (Figure 6)

Figure 6: Smart's labour productivity 2015-2020



Note:

823

Directly

employed

¹ Totals may not add up due to rounding Source: Analysis by External Consultant

34,119

Operational

indirectly supported

37%

Source: Analysis by External Consultant

Nepal

Ncell is Nepal's first private sector telecom company to operate GSM services. Today, Ncell operates the country's widest 4G network and serves 15.7 million customers, providing high-quality, modern and cost-effective services.

Contributing to the vision of Digital Nepal and the development of Nepal's economy and infrastructure, Ncell is building a best-in-class network to bring digital services to people living in rural and remote areas of Nepal.

Contribution to Gross Value Added USD463 million ¹ (1.4% of the Nation's GDP)	Ш	Capital + Operating Expenditure		<u></u>
Operational Direct GVA: Operational Indirect and Induced GVA: us287 million UsD102 million Ncell's total Gross Value Added (GVA) contribution USD463 million ¹ , accounting for 1.4% of total nation Ncell's operations directly and indirectly contribute for 84% of total GVA contribution Capital investments contributed USD75 million were stated on the stated of the stated of the stated use	ional GDP in 2020 d USD389 million , accounting	Capital Expenditure: Operating Expend USD94 million USD134 million ▶ Ncell's total Capital and Op	translates to: USD 4.9 GVA Contribution ² ion in ided at For every USD1 Ncell spent in Nepal	
Direct Employees 545 Female: Nepalese: 24% 98.0% 545 staff were directly employed by Ncell in 2020 Around 24% of total employees were female Nepalese residents accounted for 98.0% of total employees	 545 20,2 Overall, Ncell supported 3 and capital investments 	y supported: Capital Investment: 14,815 5,604 jobs³ in 2020 through its operations y supported 545 jobs . It also indirectly 5 jobs	Contribution to Public Finance USD 279 million (4.3% of total tax revenue of the Nepal government Ncell contributed USD279 million in tax accounting for 4.3% of total tax revenue of Nep government ⁴	х,

¹ Totals may not add up due to rounding ² The multiplier effect decreased from 5.9 in 2019 to 4.9 in 2020, due to the decreased productivity-impact GVA contribution.

³ Totals may not add up due to rounding

- ⁴ Estimated total government tax revenue in Nepal was NPR750 billion (USD6.4 billion). (Source: Budget Speech of Fiscal Year 2020/21, Ministry of Finance, Nepal)
 ^{*} Ncell's financial year ends on 15 Jul 2020, and the figures here represent Ncell's financial year figures

Nepal

Ncell's total economic contribution to Nepal's economy

Led by Ncell's total operating expenditure of USD134 million and capital investment of USD94 million, Ncell's total Gross Value Added (GVA) contribution to Nepal's economy was estimated at USD463 million in 2020, accounting for 1.4% of national GDP.

Ncell's operations directly contributed USD287 million GVA, accounting for 62% of total GVA. A further USD102 million was indirectly generated through the expenditures by Ncell's suppliers, accounting for 22% of total GVA. For every USD1 Ncell directly added to the economy, it generated another USD0.4 indirectly from local suppliers.

A further USD75 million contribution came from capital investment, accounting for 16% of the total GVA. (Figure 1)

Figure 1: GVA contribution to the Nepal economy in 2020

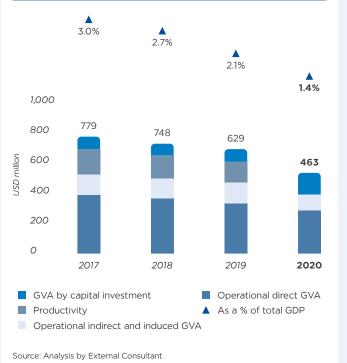


Ncell's total economic contribution over the last four years

Ncell's total GVA contribution **dropped by 40.6%** from **USD779 million in 2017 to USD463 million in 2020**, representing a decreased share of the country's GDP from 3.0% to 1.4%. This was mainly due to the decrease of operating profits and slower growth of mobile penetration.

Ncell's operational profits decreased from USD345 million to USD267 million over 2018-2020. The number of mobile subscribers in Nepal was up from 29.8 million in 2017 to 37.1 million in 2020, which is a penetration growth of **4.8 percentage points** over the 4-year period. (Figure 2)

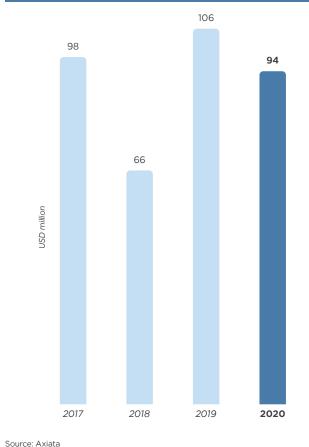
Figure 2: GVA contribution to Nepal's economy 2017-2020



Investing and innovation for the long term

Ncell's total accumulated capital investment reached USD364 million over the last four years' of operations. The capital investment was USD94 million in 2020. Capital investment plays a significant role in enhancing the company's competitiveness and contributing to Nepal's economy. (Figure 3)





Nepal

Contributions to public finance

In 2020, Ncell contributed **USD279 million in tax, accounting for 4.3%** of total tax revenue of Nepal government. Accumulated tax contribution was **USD1,100 million for the last four years**. (Figure 4)

Figure 4: Total tax contribution to public finance 2017-2020

Total employment impact

In 2020, there were **35,604 jobs** supported by Ncell's business in total. Ncell **directly provided 545 jobs** in 2020. 98.0% of the firm's employees were Nepalese residents and 24% of the total employees were female.

A further **20,245 jobs were supported indirectly** by its operations. Ncell's capital investment supported **14,815 jobs**. (Figure 5)

Ncell's labour productivity

Ncell's productivity, measured as Gross Value Added (GVA) per employee, was estimated at **USD526,540** in 2020, **a drop by 17.4%** from USD637,085 in 2019. This is mainly due to a decrease in operating profits over 2018-2020.

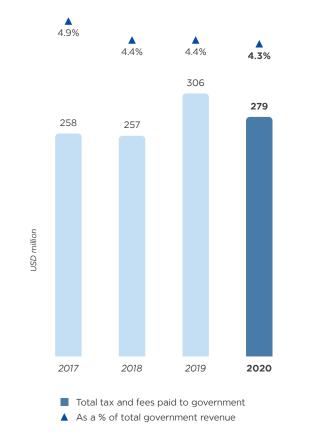
Figure 6: Ncell's labour productivity 2017-2020¹



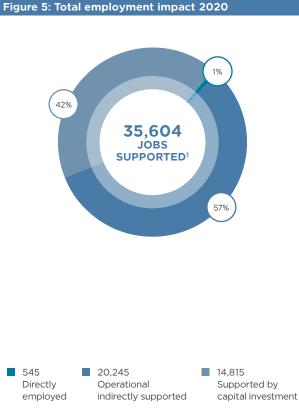
526,540

2020

105



Source: Axiata and Analysis by External Consultant



Note: ¹ Totals may not add up due to rounding Source: Analysis by External Consultant Note:

¹ Outsourced employees were excluded for all years Source: Analysis by External Consultant

2018

2019

2017



edotco is the first and leading regional integrated telecommunications infrastructure services company in Asia. edotco specialises in end-to-end solutions in the tower services sector including co-locations, build-to-suit, energy, transmission and operations and maintenance (O&M). The regional portfolio of edotco includes over 33,500 towers, with 22,329 towers directly operated by edotco and a further 11,258 towers managed. We are also supported by our state-of-the-art real time monitoring service, echo, which helps to improve field operations whilst maximising operational

efficiencies. Headquartered in Kuala Lumpur, Malaysia, edotco has offices across Asia in Bangladesh, Cambodia, Sri Lanka, Myanmar, Pakistan, Laos and the Philippines. edotco is committed to conducting our business in a responsible and sustainable manner while upholding the highest standards of integrity for the benefit of our customers, employees, communities and developing nations.

Contribution to Gross Value Added	ш	Capital + Operating Expenditure		
USD 715 million ¹ Operational Direct GVA: USD 323 million Pedotco's total Gross Value Added (GVA) cont it operates in reached USD715 million ¹ . Whill to the sum of national GDP across eight approximately 0.2% of Malaysia's national GD Pedotco's operations directly and indirect accounting for 84% of total GVA contribution Capital investments contributed USD116 million	Capital Investment GVA: USD116 million ribution across the eight economies e this is a trivial amount compared countries, for comparison this is P in 2020 ly contributed USD599 million,	Expenditure reached USD308 milli 2020, with Capital Expenditure record	n erating on in	
Direct Employees 1,314 Female: 20% • 1,314 staff were directly employed by edotco in 2020 • 20% of total employees were women	Total Jobs Supported 39,669 Directly Operational indirectly supported 1,314 26,985 Overall, edotco supported 39,66 capital investments edotco's operations directly and edotco's capital investment support	11,370 59 jobs in 2020 through its operations and indirectly supported 28,299 jobs	 Contribution to Public Finance USD 54 million (0.02% of total tax revenue of the governments countries it operates in) edotco contributed USD54 million in total ta and fees to government/regulators, accounti for 0.02% of total tax/fee revenue of t governments in countries it operates in² 	ax ng

Notes:

¹ Totals may not add up due to rounding

² Total tax/fee revenue of governments is estimated at USD227 billion, and is the sum of government revenue across all eight countries where edotco operates. Where available, government revenue estimates are obtained from national agencies. Estimates are otherwise obtained from IMF WEO



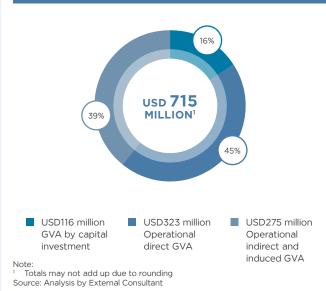
edotco's total economic contribution

edotco's substantial operations and investments contributed significantly to the economic growth in countries it operates in. With a total operating expenditure of USD187 million and capital investment of USD121 million, edotco contributed USD715 million to the economies. While this is a trivial amount compared to the sum of national GDP across eight countries, for comparison this is approximately 0.2% of Malaysia's national GDP in 2020.

edotco's operations directly contributed USD323 million, accounting for 45% of total GVA contribution. Another USD275 million was indirectly generated through the expenditures by edotco's suppliers. For every USD1 edotco directly added to the economies, it generated just under another USD0.9 indirectly from local suppliers.

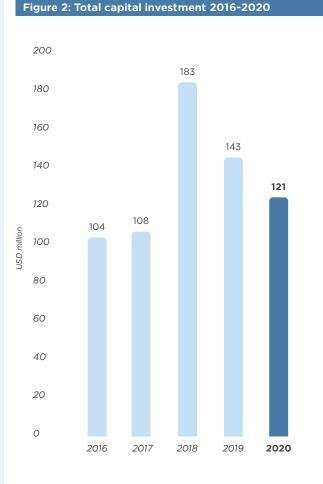
Capital investment contributed a further **USD116 million**, representing a share of 16% of the total GVA. (Figure 1)

Figure 1: GVA contribution to economies in 2020



Investing and innovation for the long term

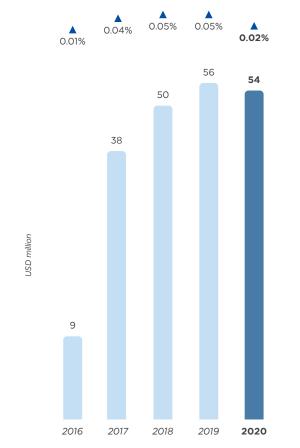
edotco's capital investment was **USD121 million in 2020.** Capital investment plays an important role in facilitating long-term sustainable development of edotco's business and contributing to the growth of the eight economies it operates in. (Figure 2)



Contributions to public finance

Annual contributions in 2020 was **USD54 million, accounting for 0.02%** of total tax revenue of the government of economies edotco operates in. (Figure 3)

Figure 3: Total tax contribution 2017-2020



Note:

Where available, government revenue estimates are obtained from national agencies. Estimates are otherwise obtained from IMF WEO Source: Axiata and Analysis by External Consultant

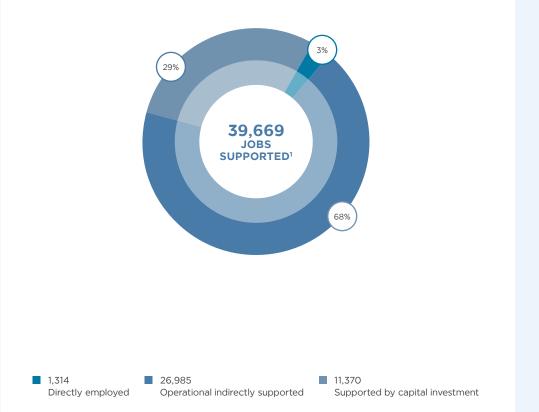


Total employment impact

1,314 jobs were directly provided edotco's operations in 2020. 20% of edotco's employees were women.

edotco's operations also indirectly supported **26,985 jobs**. A further **11,370 jobs were supported by** its capital investment. (Figure 5)

Figure 5: Total employment impact 2020



edotco's labour productivity

edotco's productivity, measured as Gross Value Added (GVA) per employee was USD246,110 in 2020.

Source: Analysis by External Consultant

Note: ¹ Totals may not add up due to rounding Source: Analysis by External Consultant

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:

- 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 thereby 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

- Total Value Added = Capital Expenditure in Host Country x Average Value Added Multiplier
- (a) For countries where employment multipliers ii 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

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

(a) For countries where employment multipliers are available:

Total Employment = Total Operating 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 anv.

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

National Penetration = Total Number of Subscribers/Population

Note: Growth factor was assumed to be 1.2% per 10% change in market penetration for all countries.

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. High-Level Impact Analysis of Axiata's COVID-19 **Activities**

Total Value Added contributions are estimated by mapping the expenditure of the activity to an I-O sector, and using the identified the Type II industry multiplier to estimate the potential GVA contribution of that activity.

Total Value-Added = Activity Monetary Expenditure x Total Value Added Multiplier

Total Employment = Total Value-Added / Average Value Added per Worker in Host Country

- Note 1: For Activity #1, "perceived value" is assumed to be total customer benefit net of total customer cost, where total customer benefit is the total monetary benefit of the product, whilst total customer cost is the total monetary costs the customer expects to incur in evaluating, obtaining, and using the product. This is used a proxy estimate for the value-added contribution of this activity.
- Note 2: Some of these activities entail capital injection into a fund. The full amount of these injections may not yet convert into actual expenditures and hence the economic contributions may not yet materialise. These estimated contributions are referred to as potential contributions.

7. 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.

Rachel Mok Huey Shyan Senior Executive, HR Operations, edotco Malaysia

Using old clothes to create new pieces of clothing.

#ItBeginsWithMe

APPENDICES

About This Report

This Sustainability Report should be read together with the Axiata **Integrated Annual** Report 2020, and the **Governance and Audited Financial Statements** 2020 to understand how we create value for our stakeholders across our markets.

The Group's sustainability disclosure, presented in this Sustainability Report 2020 as well as on our corporate details sustainability website, the management of the Group's identified material matters categorised with the universally recognised pillars of ESG, as we enhance our disclosure towards common nomenclature of our stakeholders and of global analysts. This year's report is our eighth sustainability report using the Global Reporting Initiative's (GRI) Standards guidelines, with the addition this year of references and guidance from the Sustainability Accounting Standards Board (SASB) Telecommunications Services Standards.

Report Boundary

The Axiata Sustainability Report 2020 covers the sustainability performance of our Group Corporate Centre (CC), and key operating companies covering our digital telcos, telco infrastructure, and digital businesses. For our digital telcos, this includes Celcom (Malaysia), XL (Indonesia), Smart (Cambodia), Robi (Bangladesh), Dialog (Sri Lanka), Ncell (Nepal). Digital telco operations account for over 95% of the Group's Operating Revenue. For telco infrastructure we include edotco Group which covers their operations in Malaysia, Cambodia, Sri Lanka, Bangladesh, Myanmar, Pakistan, Philippines and Laos. For our digital businesses, this year we have added our digital businesses in our sustainability reporting, where possible, for holistic group-wide disclosure.

The report excludes wholly owned and non-wholly owned subsidiaries and financial investments, and associate and companies that are in the process of being disposed. This report discusses the sustainability of the Group as a whole.

The level of disclosure, covering the Group as a whole as well as disclosure per material matter, has significantly increased in our 2020 Sustainability Report and on our corporate sustainability website. This is a conscious effort to disclose transparent, meaningful and comprehensive sustainability disclosure to our stakeholders, in ways that are greater aligned to the global sustainability reporting narrative, and in mediums that are easily accessible to our stakeholders. We note that our OpCos' operating environments may vary significantly from one market to the next, but we have nevertheless made the attempt to harmonise general reporting areas, as well as highlight the achievements and milestones of our specific OpCos throughout the disclosre. Our OpCos are encouraged to produce their own standalone sustainability report to provide more insight into their respective sustainability management and context.



Data Measurement Techniques and Assumptions

All financial data disclosed in this report is identical to that of Axiata Integrated Annual Report 2020 which has been audited by an independent third party. Other sustainability information presented in this report is based on internal data collection systems and widely accepted calculation methodologies such as the Greenhouse Gas (GHG) Protocol. The information in this report is presented on a best-effort basis and is subject to continued improvement in future reporting cycles.

Assurance

A limited assurance was conducted on selected indicators of Axiata Corporate Centre, PT XL Tbk (XL Axiata) as well as Ncell Private Limited (Ncell) by KPMG Management and Risk Consulting Sdn Bhd. This year we had enhanced the scope of assurance to include Scope 1 GHG Emissions, as well as the addition of an OpCo, Ncell. This is part of our effort to enhance sustainability data reporting across Group. The assurance was conducted in accordance with the ISAE 3000 standard "Assurance engagements other than audits or reviews of historical financial information" and the ISAE 3410 standard "Assurance engagements on Greenhouse Gas Statements". Among our key operating companies, only Dialog conducts a third-party independent assurance of their report. For more information on the subject matter and scope of assurance, please refer to KPMG Management and Risk Consulting's assurance statement on pages 121-123.

Our Sustainability Matters

Ma	terial Matters	Description	Importance to the Group	Importance to our Stakeholder Groups	Risk Category
NE	XT GENERATION DIGIT	AL CHAMPION			
•	Sustainable Business Growth SNCR Page 25	Consideration of Economic, Environmental and Social (EES), and positive direct and indirect value creation in our strategic investment decisions to enhance our shareholder returns	Venturing into new growth areas ensures competitive edge and business sustainability, while creating greater positive direct and indirect economic impacts to the society.	The Group as a strategic technology enabler supports technology partners to rapidly scale innovative digital inclusion programmes, while ensuring digital access for rural communities and developing inclusive products and services.	Financial Risk Market Risk Regulatory Risk Geopolitical Risk Strategic and Investment Risk
	Network Quality and Coverage SNCR Page 27	Enhancing network quality and coverage through continuous improvements in efficiency, availability and reliability	In maintaining the Group's position as the leading regional mobile network operator in the face of market competition, it is crucial to increase connectivity and enhance network reliability across the Group – ultimately, translate into positive business outcomes and strengthen our relationship with stakeholders.	Through quality network service and coverage, we bring connectivity to rural and urban communities, businesses and corporate enterprises to create real and tangible impacts in their lives.	Financial Risk Market Risk Regulatory Risk Operational Risk Strategic and Investment Risk Technology Risk
	Digital Inclusion SNCR Page 29	Providing affordable and innovative products and services in bridging the digital gap	Investments in digital services and product innovation allows us to create products and services that are appealing to our customers - bridging the digital gap in our operating markets.	Our investments in digital technology give better access to basic services (e.g. financial, healthcare and education), to foster inclusion and drive innovation.	Financial Risk Market Risk Regulatory Risk Strategic and Investment Risk Technology Risk
	Digitisation and Modernisation SNCR Page 39	Technological innovation to enhance key internal business functions, improve process efficiency and effectiveness, and promote innovation and business continuity	Such investment allows the Group to improve its internal process efficiency, effectiveness, promote innovation while ensuring business continuity, in our pursuit of becoming The Next Generation Digital Champion.	Enhanced internal processes provides opportunities for us to better serve our stakeholders (e.g. customers, employees) to experience a more efficient and customer- friendly services.	Market Risk Digital Risk Operational Risk Strategic and Investment Risk Technology Risk
EN	VIRONMENT				
•	Climate Action SNCR Page 43	Internal controls and monitoring mechanisms to manage environmental impacts	Affects our reputation as a responsible corporate citizen and strengthens our social license to operate through our efforts in reducing environmental impacts arising from our business.	Uphold our reputation as a responsible corporate citizen and maintain positive relationship with the stakeholders (e.g. local community, regulatory bodies, etc.) by minimising negative impacts to the environment.	Regulatory Risk Governance and Integrity Risk Operational Risk
	Resource and Waste Management SNCR Page 47	Towards circular economy within our operations as well as the solutions we can provide our customers and supply chains waste management	Resource consumption and the management of the waste we generate affects how much of what our operations produce is sent to landfill, and responsible waste management, as well as product development with resource and waste in consideration, is key towards a circular economy model.	The individual consumption of resources and generation of waste is an indirect impact through our customers, suppliers, employees, thus this is a value chain-wide material matter for sustainability.	Regulatory Risk Governance and Integrity Risk Operational Risk

Our Sustainability Matters

Ma	terial Matters	Description	Importance to the Group	Importance to our Stakeholder Groups	Risk Category
so	CIAL				
•	Fair Employment and Welfare SNCR Page 52	Fostering fair recruitment practices by embracing diversity and inclusion in the workforce, and offering employees fair compensation and benefits	Promoting inclusion and ensuring employee welfare. Diverse and motivated employees allow us to broaden our perspectives and present new opportunities for business growth. Respecting labour practices strengthens our social license to operate in various operating markets.	Embracing a diverse, inclusive and collaborative work culture promotes employee wellbeing and enable our employees to be empowered and to achieve their best in serving the customers' needs.	Geopolitical Risk People Risk
•	Talent Development SNCR Page 54	Promote development and uplift competencies of employees to respond to the rapidly changing and complex business environment	Our specialised development programmes increases our employees' competitive edge in responding to the rapidly changing and complex business environment.	As our industry evolves in the era of digital disruption, it is crucial for our employees to understand the risk of not adopting new skills and be quick to seize opportunities.	Geopolitical Risk People Risk
•	Employee Health, Safety and Wellbeing SNCR Page 56	Providing for the health, safety and wellbeing of our employees in ways that address key challenges and bring value to their livelihood in the workplace	Responding to our employees' interests, expectations and requirements in the area of health, safety and wellbeing ultimately addresses people empowerment as well as a safe, productive workforce.	Our employees depend on the support of the added value of care and commitment from the organisation that they are a part of, more than just within the office but holistic employee care.	Geopolitical Risk People Risk
	Customer Service SNCR Page 60	Delivering a differentiated user experience for customers, and offering the most affordable products and services relative to customer promise in our highly competitive markets	Customer satisfaction is key to our business success. Understanding our customers' evolving needs and providing service that exceeds their expectations allows us to remain relevant and competitive.	Our customers/community depend on us to deliver our commitment through innovative products and services, playing a prominent role in the telecommunication industry.	Market Risk Cyber Risk Operational Risk Strategic and Investment Risk
	Supply Chain Management SNCR Page 62	Consideration of EES factors across supply chain management and processes	Suppliers are an integral part of our business operations to ensure quality services and help to shape innovative products, while ensuring customer satisfaction.	Our efforts to support local vendors and partners is crucial in upgrading the qualifications of local suppliers/vendors, on par with the global and regional service providers.	Operational Risk Governance and Integrity Risk
	Community Development SNCR Page 66	Financial and non-financial contributions to support local communities, underprivileged and underserved groups	Foster positive relationships with our stakeholders, particularly local communities and regulators, as we contribute to national aspirations to uplift the wellbeing of local communities and protect the environment.	Uphold our reputation as a responsible corporate citizen and maintain positive relationship with the stakeholders (e.g. local community, regulatory bodies, etc.) by supporting the local communities' needs, based on the national context or priorities.	Geopolitical Risk Governance and Integrity Risk
	Emergency and Disaster Response SNCR Page 70	Providing society in times of emergency and disaster, through the contribution of our business streams in disaster response	The value that we as a regional telco company can provide to society in times of emergency and disaster response is significant in terms of connectivity and sharing of alerts and warnings.	The dependency of society on connectivity in the event of an emergency of disaster is high therefore our stakeholders rely on telcos to ensure this area is responsibly managed.	Market Risk Regulatory Risk Strategic and Investment Risk Technology Risk

Our Sustainability Matters

Ma	iterial Matters	Description	Importance to the Group	Importance to our Stakeholder Groups	Risk Category
GO	VERNANCE				
	Business Ethics and Compliance SNCR Page 77	Enhance business integrity compliance within the ambit of Malaysian and international laws on bribery and corruption	We seek to uphold a culture of ethics and integrity. The inability to do so may impact/limit our growth, relationship with stakeholders and our reputation as a reliable organisation.	It is of utmost importance to secure and maintain a relationship based on trust with the relevant stakeholders.	Regulatory Risk Cyber Risk Digital Risk Operational Risk Geopolitical Risk Governance and Integrity Risk
►	Privacy and Data Protection SNCR Page 80	Protection of all data, information and intellectual property against cyber security breaches	The security of our stakeholders' data is of utmost importance in maintaining a transparent relationship, and also to ensure long-term viability of our business.	Stakeholders entrust us with their data, and we maintain that trust with the commitment to ensuring the security and privacy of their data.	Cyber Risk Digital Risk
	Regulatory and Political Risk SNCR Page 83	Management of the evolving changes in the regulatory landscape and political context	The value that we as an organisation can provide through our businesses is determined by the regulatory landscape and addressing the evolving changes of this and the political context.	Our efforts to contribute to regulatory developments as a regional telco as well as responsible management of risks in the areas we operate in are part of our response to our stakeholders.	Regulatory Risk Geopolitical Risk Governance and Integrity Risk

Management Of Material Risks And Opportunities

Axiata uses an integrated assurance methodology to manage our risks and opportunities, to catalyse long-term value creation. The following outlines our material risks, along with our Group's exposure

Risk Category	Mitigating Actions and Opportunities Arising	Risk Category	Mitigating Actions and Opportunities Arising	
Financial Risk	 Risk Owners: Axiata Treasury Management Centre Closely monitoring forex movements and formulates hedging strategies to minimise exposure on foreign loans Monitoring Gross Debt/EBITDA level to ensure it is within the set threshold Revisiting investment/funding plans, reviewing product plans and monitoring OpCo dividend policy 	Geo-Political Risk Strategic and	 Risk Owners: OpCo Management, Group Regulatory Closely collaborate with OpCos to track market geo-political developments, and tap into their local expertise, familiarity and connections to assess changing scenarios Maintain a neutral stance and foster healthy government relations across all markets Contribute to national socioeconomic development through various CSR programmes Risk Owners: Mergers and Acquisitions Committee, Group Corporate Development 	
Market Risk	 Reviewing business structure to identify business leakages and enhance the business model Risk Owners: OpCo CEOs 	Investment Risk	Active M&A activities balanced by robust due diligence to evaluate, manage and anticipate potential risks and challenges	
PIdIREL RISK	 Aggressive M&A, focusing on industry consolidations in targeted markets Seeking opportunities for telco infrastructure sharing to reduce investment costs Investing in new technologies for the competitive edge Establishing strategies with digital players to meet evolving customer needs and reap higher revenue yield per customer 		 Post-acquisition transitional teams to ensure alignment and adoption of Axiata's organisational, operational and cultural values Seeking opportunities for infrastructure sharing to manage cost whilst maintaining strategic alliances Closely monitoring the market landscape to anticipate other developments that may heighten competition 	
Regulatory	Risk Owners: Group Regulatory	People Risk	Risk Owners: Group People Division	
Risk	 Collaborating with other telco players to present a united voice advocating strict compliance, and fair and transparent policies Active engagements and dialogues with regulatory and government officials to anticipate emerging regulations, and highlight and address concerns of the telco sector, to advocate sustainable regulatory regimes Participating in government consultations and industry events to foster collaboration 		 Active talent hiring agenda and robust talent development programmes Competitive salary packages benchmarked against peers, attractive performance based rewards and a positive working environment Imposing stringent working protocols and SOPs4 for Work-In-Office and Work-From Home arrangements to combat COVID-19 Enhancing the AxiataCares programme at Group and OpCo levels 	
	 and knowledge sharing for best industry policies and practices Dedicated Subject Matter Experts to monitor regulatory compliance at Group level and across all OpCos 	Technology Risk	 Risk Owners: Group Technology Constantly reviewing and refreshing our technology to remain relevant whilst meintaining financial prudance. 	
Cyber and Data Privacy Risk	 Risk Owners: Group Risk and Compliance Management Committee Maturing cyber security and data privacy across all OpCos against global benchmarks and best practices by adopting and aligning to internationally recognised standards such as the NISTI Framework, AICPA/CICA2 and CMMI3 Privacy Maturity models Establishing a long-term Data Privacy and Cyber Security Strategy Framework and Roadmap, ensuring alignment and standardisation across all OpCos to meet strategic objectives 		 maintaining financial prudence Future-proofing is a critical criterion in network equipment selection and built into the procurement process Increasing digitisation and automation efforts to ensure optimum technology utilisatio Proactively conducting studies on technological advancements, especially in 5G, while charting future network strategy Monitoring the implementation of various systems and applications across all divisions and seeking opportunities for consolidation and synergies 	
	 Embedding Cyber Security and Data Privacy controls by design across all business facets by incorporating the related standards and requirements in: Protecting our hardware and software Improving Training and Awareness Reducing Third-party risk through the Supplier Code of Conduct and contract clauses Periodic automated assessments and remediation to identify gaps Incorporating Cyber Security and Data Privacy performance into OpCos KPI scorecards 	Governance and Integrity Risk	 Risk Owners: Group Risk and Compliance, Group Human Resource, Group Sustainability Axiata's Code of Conduct guides personnel conducting business for/on behalf of Group Implementation of Group-wide Corporate Compliance Programme tobuild strong governance in conformance to the T.R.U.S.T. principles defined in the Guidelines C 	
Dperational Risk	 Risk Owners: Group Enterprise Risk Management, Group Technology, Group Procurement Monitoring vendor performance, especially for major and high risk vendors Monitoring supply availability, according to current and future needs Exploring alternative vendors to reduce dependencies Establishing clear Business Continuity Management (BCM) plans to address supply chain risks, disruptions, and the business recovery strategy based on multiple crisis simulation scenarios 		 Adequate Procedures issued by the Prime Minister's Department, and strengthening Axiata's compliance maturity Establishment of a strong governance structure with the BRCC and the Risk and Compliance Management Committee Appointment of a Group Chief Risk and Compliance Officer reporting to the BRCC an setting up the Compliance function at Group and OpCo levels Establishing the Sustainability Steering Committee and developing the Net-Zero Carbo Roadmap, ensuring Group-wide efforts towards common goals 	

future opportunities.

and potential impacts, and identifies mitigation measures which are linked to our Axiata strategy and

List Of Abbreviations

Over-The-Top (OTT) Annual General Meeting (AGM) Axiata Digital (AD) Axiata Digital Innovation Fund (ADIF) Axiata Digital Labs (ADL) Axiata Digital Services (ADS) Axiata Procurement Centre (APC) Axiata Treasury Management Centre (ATMC) Axiata Young Talent Programme (AYTP) Base Transceiver Stations (BTS) Board Audit Committee (BAC) Business Continuity Management (BCM) Business Development Programme (BDP) Capital Expenditure (capex) Compound Annual Growth Rate (CAGR) Connected Women Commitment Initiative (CWCI) Corporate Responsibility (CR) Corporate Social Responsibility (CSR) Cyber Security Operations Centre (CSOC) Cyber Security Steering Committee (CSSC) Department of Education (DOE) Department of Hydrology & Meteorology (DHM) Disaster and Emergency Warning Network (DEWN) Disaster Readiness Programme (DRP) edotco Group (e.co) Employee Engagement Survey (EES) Enterprise Risk Management (ERM) Environmental, Social and Governance (ESG) Economic. Environmental and Social (EES) First Line Manager (FLM)

Get Out of Diesel (GOOD) Giaaioule (GJ) Global Reporting Initiative (GRI) Government-Linked Company (GLC) Greenhouse Gas (GHG) Gross Domestic Product (GDP) Gross Value Added (GVA) Group Accelerated Development Programme (GADP) Group Risk Management Committee (GRMC) GSM Association - An association of mobile operators and related companies devoted to supporting the standardising, deployment and promotion of the GSM mobile telephone system (GSMA) GSMA's Humanitarian Connectivity Charter (HCC) High Throughput Satellite (HTS) Human Resources (HR) Improvement, Innovation, Investment & Impact (4i) Info-communications Media Development Authority (IMDA) Information and Communications Technology (ICT) International Finance Corporation (IFC) International Long Distance (ILD) International Standard on Assurance Engagement (ISAE) Internet Data Centre (IDC) Internet of Things (IoT) Key Performance Indicators (KPI) Kilowatt (kW) Local Partner Development Programme (LPDP) Majlis Amanah Rakyat (MARA) Malaysian Communication and Multimedia Commission (MCMC) Malaysian Sustainability Reporting Awards (MasRA) Market Capital (Market Cap)

Memorandum of Understanding (MoU) Ministry of Higher Education (MoHE) Minority Shareholder Watchdog Group (MSWG) Malaysia Digital Economy Corporation (MDEC) Mobile Virtual Network Operator (MVNO) Net Promoter Score (NPS) Occupational Health and Safety (OHS) OpCo Accelerated Development Programme (OADP) **Operating Companies (OpCos)** Operating Expenditure (Opex) Personal Accident (PA) Personal Data Protection Act (PDPA) Profit After Tax (PAT) Senior Leadership Team (SLT) Short Messaging System (SMS) Small and Medium Enterprises (SME) Standard & Industrial Research Institute of Malaysia (SIRIM) Strategic Partners Development Programme (SDP) Supplier Performance Management (SPM) Sustainability Engagement Index (SEI) Uncompromising Integrity. Exceptional Performance (UI.EP) University Leadership Development Programme (ULDP) Unstructured Supplementary Service Data (USSD) Value Added Services (VAS) Vendor Development Programmes (VDP) Venture Capital (VC) Year on Year (YoY) Young CEO Development Programme (YCDP)

Data In Numbers

Aspect	Indicator	Detail	Unit	Celcom	XL	Dialog	Robi	Smart	Ncell	edotco	сс	Overall
Market	202-1	Ratios of standard entry level wage vs	Male	2.01:1.0	1.4:1.0	1.7:1.0	3.4:1.0	1.0:1.0	2.2:1.0	2.5:1.0	2.5:1.0	1.3:1.0
Presence		local min wage	Female	2.01:1.0	1.4:1.0	1.7:1.0	3.4:1.0	1.0:1.0	1.8:1.0	2.5:1.0	2.5:1.0	1.3:1.0
	202-2	Local Senior Management*1	%	83%	80%	90%	78%	36%	22%	80%	60%	66%
Procurement	204-1	Spending on local suppliers*2	%	19%	96%	45%	52%	32%	63%	82%	50%	55%
Practices		Spending on foreign suppliers	%	81%	4%	55%	48%	68%	37%	18%	50%	45%
Energy	302-1	Direct energy consumption	GJ	217,163.83	144,958.57	73,135.29	89,705.06	80,378.08	46,553.54	885,593.61	-	1,537,487.99
		Indirect energy consumption	GJ	301,080.37	2,799,170.50	634,083.31	723,676.11	350,933.29	256,640.01	1,834,066.24	1,514.00	6,901,163.83
Emissions	305 - 1	Scope 1 GHG emissions*	Tonnes CO ₂ e	14,515.59	9,669.54	4,888.80	5,942.74	5,371.77	3,098.34	59,061.41	-	102,548.19
	305-2	Scope 2 GHG emissions	Tonnes CO ₂ e	56,062.76	599,587.45	123,793.58	128,791.23	60,970.76	216.85	306,936.68	281.86	1,276,641.18
Employment	401-1	Employees by gender	Male	1,319	1,110	2,107	1,189	524	413	1,047	168	7,877
			Female	1,125	484	626	182	299	132	267	149	3,264
			Total employees	2,444	1,594	2,733	1,371	823	545	1,314	317	11,141
		Women in Leadership positions	%	22%	33%	30%	0%	0%	2%	30%	22%	18%
		Joining the group	Male	62	48	70	135	66	15	97	64	557
		(by gender category)	Female	34	35	47	41	39	3	43	27	269
		Joining the Group	< 30 years old	34	38	83	129	83	11	43	37	458
		(by age category)	31-49 years old	55	43	30	46	22	5	80	47	328
			> 50 years old	7	2	4	1	0	2	17	7	40
Health &	403-1	H&S representation	%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Safety	403-2	Injuries (workforce)	Number	3	1	6	0	0	0	1	0	11
		Fatalities	Number	0	0	0	0	0	0	1	0	1
		Lost Day Rate	LTIFR	0.48	0.18	0.55	0	0	0	0.24	0	n/a
Training	404-1	Average training hours per year per	Male	2.7	25.3	30.9	43.0	30.0	20.1	15.5	8.5	22.0
		employee (by gender category)	Female	2.9	26.4	39.0	42.0	28.2	14.8	16.7	7.1	22.1
		Average training hours per year per	Senior Management	83.1	23.1	12.8	39.0	50.4	15.1	22.2	18.1	33.0
		employee (by employee category)	Mid Management	1.6	29.5	45.0	41.0	31.5	17.1	23.2	6.9	24.5
			Executive	2.7	35.3	33.0	44.0	24.9	18.9	10.6	13.8	22.9
			Non-executive	3.8	24.2	26.7	n/a³	29.7	19.8	1.9	4.0	15.7
	404-3	Percentage of employees receiving regular performance and career development* ⁴	%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Diversity	405 - 1	Staff diversity	< 30 years old	197	250	780	406	449	28	178	62	2350
		(by age category)	30-50 years old	1872	1,267	1,854	935	363	506	916	188	7901
			> 50 years old	375	77	99	30	11	11	220	67	890

Note:

² Local percentage considers weightage given to local participation in ownership, management, employment, and extent of value added locally as defined by Axiata Procurement Centre

³ Robi's employee profile in 2020 excludes non-executive level employees

⁴ Total employees receiving performance review includes an average of employees by gender as well as employee category

* KPMG Malaysia provided Limited Assurance on the Selected Sustainability Indicators. In relation to the previous year assurance activities, Scope 2 GHG and Average training hours have been excluded from the boundary of the limited assurance. However, KPMG Malaysia finds that Axiata has notable enhancement in ensuring accuracy of its data. In relation to Scope 2 GHG, KPMG observed enhancement in data collection process with adoption of third-party online database, establishment of specific team responsible to monitor energy consumption at Axiata. In relation to Average training hours, KPMG observed enhancement in data collection process with adoption of third-party online database, establishment of specific team responsible to monitor energy consumption at Axiata. In relation to Average training hours, KPMG observed accuracy of training hours, where Axiata exclude break period from the sessions, newly introduced training reward programme for employees completing over 60 hours of training for the year, and introduction of mandatory training programme for all OpCos to standardise and improve understanding of Axiata's operations (e.g. data privacy and anti-bribery training sessions).

¹ Senior Management is defined as CEO and CEO-1. Local country refers to citizens of respective OpCo country

GRI Content Index

This Content Index provides an overview of the GRI Standard (in Accordance Core) Disclosures made in this report, the Axiata Integrated Annual Report (IAR) 2020, and the Governance and Audited Financial Statements (GAFS) 2020.

General Stan	dard Disclosures	Page Number	General Sta	ndard Disclosures	Page Number		
	GRI Standards 102: General Disclosur	es	Stakeholder Engagement				
Organisation	al Profile		102-40	List of stakeholder groups	Pg. 17-19		
102-1	Name of the organization	Pg. 5	102-41	Collective bargaining agreements	Pg. 52		
102-2	Activities, brands, products, and services	Pg. 5-6, IAR Pg. 60-79	102-42	Identifying and selecting stakeholders	Pg. 17-19, IAR Pg. 33-34		
102-3	Location of headquarters	IAR Pg. 105	102-43	Approach to stakeholder engagement	Pg. 17-19, IAR Pg. 33-34		
102-4	Location of operations	Pg. 6	102-44	Key topics and concerns raised	Pg. 17-19, 112-114		
102-5	Ownership and legal form	Pg. 5, GAFS Pg. 185	Deperting D				
102-6	Markets served	Pg. 5	Reporting Pr	actice			
102-7	Scale of the organization	Pg. 5, IAR Pg. 60-79	102-45	Entities included in the consolidated	GAFS Pg. 162-170		
102-8	Information on employees and other workers	Pg. 51-53	-	financial statements			
102-9	Supply chain	Pg. 61-64	102-46	Defining report content and topic Boundaries	Pg. 111		
102-10	Significant changes to the organization and	None	102-47	List of material topics	Pg. 14-15, 112-114		
	its supply chain		102-48	Restatements of information	None		
102-11	Precautionary Principle or approach	Pg. 76-77, GAFS Pg. 35	102-49	Changes in reporting	Pg. 111		
102-12	External initiatives	Pg. 25	102-50	Reporting period	Pg. 111		
102-13	Membership of associations	Pg. 26	102-51	Date of most recent report	Pg. 111		
e t 1			102-52	Reporting cycle	Pg. 111		
Strategy			102-53	Contact point for questions regarding the report	sustainability@axiata.com		
102-14	Statement from senior decision-maker	Pg. 7-11	102-54	Claims of reporting in accordance with the GRI Standards	Pg. 111		
Ethics and Inf	tegrity		102-55	GRI content index	Pg. 118-120		
102-16	Values, principles, standards, and norms of behavior	Pg. 52	102-56	External assurance	Pg. 121-123		
Governance							
102-18	Governance structure	Pg. 76, IAR Pg. 80-103					

GRI Content Index

This Content Index provides an overview of the GRI Standard (in Accordance Core) Disclosures made in this report, the Axiata Integrated Annual Report (IAR) 2020, and the Governance and Audited Financial Statements (GAFS) 2020.

	External Assurance
nti- None reported	
trust, and monopoly practices GRI Topic-Specific Standards 300: Environmental 302: Energy	
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Pg. 46	
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Pg. 46	
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307: Environmental Compliance	
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None reported	
k	

GRI Content Index

This Content Index provides an overview of the GRI Standard (in Accordance Core) Disclosures made in this report, the Axiata Integrated Annual Report (IAR) 2020, and the Governance and Audited Financial Statements (GAFS) 2020.

GRI Disclosure Number	GRI Disclosure Title	Page Number	External Assurance
	GRI Topic-Specific Standards 400: Soci	al	
401: Employn	nent		
103	Management Approach	Pg. 51 - 58	
401-1	New employee hires and employee turnover	Pg. 117	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Pg. 52, GAFS Pg. 87	
402: Labor/M	anagement Relations		
103	Management Approach	Pg. 52	
402-1	Minimum notice periods regarding operational changes	See notes	
403: Occupat	ional Health and Safety		
103	Management Approach	Pg. 56	
403-1	Workers representation in formal joint management-worker health and safety committees	Pg. 56, 117	
403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	Pg. 56, 117	
404: Training	and Education		
103	Management Approach	Pg. 54 - 55	
404-1	Average hours of training per year per employee	Pg. 117	
404-2	Programs for upgrading employee skills and transition assistance programs	Pg. 54-55	
404-3	Percentage of employees receiving regular performance and career development reviews	Pg. 117	CC, XL, Ncell
405: Diversity	and Equal Opportunity		
103	Management Approach	Pg. 53	
405-1	Diversity of governance bodies and employees	Pg. 53, 117, IAR Pg. 81-82	
405-2	Ratio of basic salary and remuneration of women to men	Pg. 117	
406: Non-dise	rimination		
103	Management Approach	Pg. 52	
406-1	Incidents of discrimination and corrective actions taken	None reported	

GRI Disclosure Number	GRI Disclosure Title	Page Number	External Assurance			
407: Freedom of Association and Collective Bargaining						
103	Management Approach	Pg. 52				
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Pg. 52				
408: Child Lab	or					
103	Management Approach	Pg. 52				
408-1	Operations and suppliers at significant risk for incidents of child labor	Pg. 52				
409: Forced or	r Compulsory Labor					
103	Management Approach	Pg. 52				
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Pg. 52				
413: Local Con	nmunities					
103	Management Approach	Pg. 29-38, 65-73				
413-1	Operations with local community engagement, impact assessments, and development programs	Pg. 29-38, 65-73				
418: Customer Privacy						
103	Management Approach	Pg. 59, 80-82				
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	None reported				
419: Socioecor	nomic Compliance					
103	Management Approach	GAFS Pg. 25-26				
419-1	Non-compliance with laws and regulations in the social and economic area	None reported				
	e have chosen not to disclose at this time inimum notice period according to local laws					

Disclosure 402-1: Minimum notice period according to local laws

Independent Assurance Report To The Members Of Axiata Group Berhad

(Company No. 242188-H) (Incorporated in Malaysia)

Report on the Limited Assurance of the Selected Sustainability Indicators

In accordance with the terms of our engagement, we, KPMG PLT, have been engaged by the Board of Directors of Axiata Group Berhad to provide limited assurance on the Selected Sustainability Indicators ("identified as the Selected Sustainability Indicators") for the year ended 31 December 2020 as published by Axiata Group Berhad in its Sustainability & National Contribution Report 2020 ("the Report").

Board and Management's Responsibilities

The Board of Directors and Group Management of Axiata are responsible for the preparation and presentation of the Selected Sustainability Indicators in accordance with Global Reporting Initiative ("GRI") Standards, as well as Axiata Group Berhad's definition and calculation methodologies which are to be disclosed in the Report including any significant inherent limitations, and the information and assertions contained within it; for determining the objectives in respect of sustainable development performance and reporting, including the identification of stakeholders and material issues; and for establishing and maintaining appropriate performance management and internal control systems from which the reported performance information is derived.

The Board of Directors and Group Management is responsible for preventing and detecting fraud and for identifying and ensuring that Axiata Group Berhad and its subsidiaries (hereinafter referred to as "Axiata Group" or "the Group") complies with laws and regulations applicable to its activities.

The Board of Directors and Group Management is also responsible for ensuring that staff involved with the preparation and presentation of the description and the Report are properly trained, information systems are properly updated and that any changes in reporting encompass all significant Operating Companies ("OpCos").

Our Responsibilities

Our responsibility is to carry out a limited assurance engagement and to express a limited assurance opinion based on the work performed and evidence obtained.

We conducted our engagement in accordance with International Standard on Assurance Engagements ("ISAE") 3000 (Revised), Assurance Engagements other than Audits or Reviews of Historical Financial Information and ISAE 3410, Assurance Engagement on Greenhouse Gas Statements, issued by the International Auditing and Assurance Standards Board ("IAASB"). ISAE 3000 requires that we plan and perform the engagement to obtain limited assurance about whether the Selected Sustainability Indicators is free from material misstatement.

Our Independence and Quality Control

KPMG PLT applies the Malaysian Approved Standard on Quality Control, ISQC 1 and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We have complied with the independence and other relevant ethical requirements of the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards) ("IESBA Code"), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Independent Assurance Report To The Members Of Axiata Group Berhad

(Company No. 242188-H) (Incorporated in Malaysia)

Selected Sustainability Indicators

Selected Sustainability Indicators includes the following data for the year ended 31 December 2020:

- Scope 1 Greenhouse Gas ("GHG") Emissions (GRI 305-1);
- Percentage of employees receiving regular performance & career development (GRI 404-3);
- Spending on local suppliers (GRI 204-1); and
- Local senior management (GRI 202-2).

The boundary of the limited assurance engagement by KPMG represents the OpCos' operations in Malaysia (Corporate Center of Axiata ("CC"), Celcom Axiata Berhad ("Celcom"), edotco Group Sdn Bhd ("edotco")), Indonesia (PT XL Axiata Tbk ("XL Axiata")), Nepal (Ncell Axiata Limited ("Ncell")), Bangladesh (Robi Axiata Limited ("Robi"), edotco), Sri Lanka (Dialog Axiata Group ("Dialog")), Cambodia (Smart Axiata Company Limited ("Smart"), edotco), Myanmar (edotco), Pakistan (edotco), Laos (edotco), and Philippines (edotco), except for the following indicator:

Scope 1 GHG Emissions, for operations in Nepal (Ncell).

The selected OpCos for our site level testing on both qualitative and quantitative criteria for 2020 increased from the previous year of two OpCos to three OpCos, as follows:

- CC (Malaysia);
- XL Axiata (Indonesia); and
- Ncell (Nepal) additional OpCo for site level testing in 2020.

In this limited assurance engagement, all OpCos were reviewed at group level testing on both qualitative and quantitative criteria.

Procedures Performed

Our limited assurance engagement on the Selected Sustainability Indicators consists of making enquiries, primarily of persons responsible for the preparation of the Selected Sustainability Indicators presented in the Report, and applying analytical and other evidence gathering procedures, as appropriate. These procedures included:

- Enquiries of management to gain an understanding of the processes for determining material issues for key stakeholder groups;
- Interviews with senior management and relevant staff at group level and selected OpCo level concerning sustainability strategy and policies for material issues, and the implementation of these across the OpCos;
- Interviews with relevant staff at the group and OpCo level responsible for providing the Selected Sustainability Indicators in the Report;
- Interviews with OpCos, selected on the basis of a risk analysis including the consideration of both quantitative and qualitative criteria;
- Identify the risks of material misstatement of the Selected Sustainability Indicators and the Report, whether due to fraud or error, design and perform limited assurance procedures to address those risks and obtain limited assurance evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- Obtain an understanding of internal control relevant to the engagement in order to design procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control;
- Comparing the Selected Sustainability Indicators presented in the Report to corresponding information in the relevant underlying sources on a sample basis to determine whether all the relevant information has been appropriately included in the Report;
- Evaluated the Selected Sustainability Indicators presented in the Report to determine whether they are in line with our overall knowledge of, and experience with, the sustainability performance of the Group;
- Evaluated the remainder of the Report to determine whether there are any material misstatements of fact or material inconsistencies based on our understanding obtained as part of our assurance engagement.

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 and consequently the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Independent Assurance Report To The Members Of Axiata Group Berhad

(Company No. 242188-H) (Incorporated in Malaysia)

Inherent Limitations

Due to the inherent limitations of any internal control structure it is possible that errors or irregularities in the information presented in the Report may occur and not be detected. Our engagement is not designed to detect all weaknesses in the internal controls over the preparation and presentation of the Report, as the engagement has not been performed continuously throughout the period and the procedures performed were undertaken on a test basis.

Opinion

Our opinion has been formed on the basis of, and is subject to, the matters outlined in this Independent Limited Assurance Report.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Based on the limited assurance procedures performed and evidence obtained, as described above, nothing has come to our attention that would lead us to believe that the Selected Sustainability Indicators included in the Report of the Group for the year ended 31 December 2020, have not in all material respects, been prepared and presented in accordance the GRI Standards, as well as the Group's definition and calculation methodologies.

Purpose of our Independent Limited Assurance Report

In accordance with the terms of our engagement, this Independent Limited Assurance Report on the Selected Sustainability Indicators has been prepared for Axiata Group and for no other purpose or in any other context.

Restriction of use of our Independent Limited Assurance Report

Our Independent Limited Assurance Report should also not be regarded as suitable to be used or relied on by any party wishing to acquire rights against us other than the Axiata Group, for any purpose or in any other context. Any party other than the Axiata Group who obtains access to our Independent Limited Assurance Report or a copy thereof and chooses to rely on our Independent Limited Assurance Report (or any part thereof) will do so at its own risk. To the fullest extent permitted by law, we do not accept nor assume responsibility and deny any liability to any party other than the Axiata Group for our work, for this Independent Limited Assurance Report.

Our Independent Limited Assurance Report is released to the Axiata Group on the basis that it shall not be copied, referred to or disclosed, in whole (save for the Axiata Group's own internal purposes) or in part, without our prior written consent.

Assured by: KPMG PLT (LLP0010081-LCA & AF 0758) Chartered Accountants Malavsia

12 May 2021

