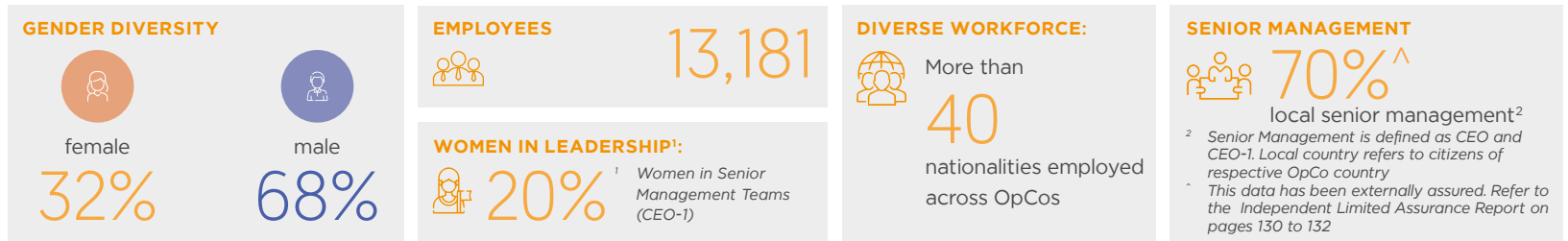


Employees

Our employees are one of our key stakeholders. They are essential to the successful delivery of the Group's strategy to sustain business performance over the long term. We rely on our international workforce of 13,181 employees to provide best-in-class digital experiences for our customers.

OUR PEOPLE IN 2021



We welcome talents from different walks of life and currently employ workers from more than 40 nationalities around the world. In turn, we strive to provide an empowering and unparalleled environment in which they can grow professionally and personally.



Fair Employment and Welfare



As part of managing our employee relations, we are committed to recruiting, retaining and rewarding our employees in accordance with fair and equal employment practices. As a responsible employer, we place value in investing in our workers to ensure sustainability of our business and are dedicated to promoting a culture that strives for excellence and beyond.

APPROACH

Our management of employee relations is conducted in accordance with Group-wide standards institutionalised in our guiding principles including our company values UI.EP and Code of Conduct, and workplace policies covering recruitment, benefit policies and standards. These are tailored within each OpCo, outlining our commitment to trust-based collaboration with employee representatives. We also extensively review and revise these policies each year to reflect relevant developments. Generally, our policies and standards encompass:

Ensuring recruitment activities are fair and non-discriminatory, recognise opportunities, initiatives, and rapidly evolving skill profiles of functions across divisions, the Organisation and its OpCos.

Recruitment

Working conditions

Enabling fair, non-discriminatory working conditions that promote individual growth in compliance with health and safety standards while also governed by our core values and Code of Conduct.

Employee Code of Conduct

Providing great benefit packages to full-time employees to ensure their wellbeing, while contributing to fair workplace conditions through provisions for parental leave, employees with families and employees with dependents among others.

Compensation and benefits

Performance management

Equipping our employees with the right tools and access to resources for employees to perform to the best of their abilities and to provide them with fair opportunity to grow and excel within and across the Organisation.

OUTLOOK

Our Axiata 5.0 Vision is anchored on the emphasis that we continue to place on our people on how we can strive towards operational excellence and service delivery through fair employment practices and ways of working. Towards this end, we aspire to collaborate better, closer and more effectively as one team towards ensuring an inclusive and well-respected workplace.



Fair Employment And Welfare



OUR KEY INITIATIVES

Culture of Integrity in the Workplace

We are guided by our values: Uncompromising Integrity, Exceptional Performance (UI.EP). These values continue to guide us and form the core of our ethical principles and actions. Also, our Axiata Code of Conduct governs our behaviour towards our colleagues and stakeholders within our workforce and across our value chain. The Code of Conduct also encompasses universal human rights and the International Labour Organisation (ILO) Core Labour Standards.



Respect for the ILO Convention

Freedom from
Forced Labour

Freedom from
Child Labour

Freedom from
**Discrimination
at Work**

Freedom to
**form and join a union,
and to bargain collectively**

2 digital telcos have employee unions
Unions represent **3.4%** of our employees

Our **Speak Up Hotline** facilitates the reporting of actual or suspected misconduct and illegal or unethical behaviour without risk of victimisation, retribution, and retaliation. The channel is open to all stakeholders to whistleblow on any employee across Axiata. Available 24 hours a day, seven days a week via the web and a toll-free number, reports can be made in the native languages within the Group's footprint.

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



Uncompromising Integrity

Always doing the right thing and fulfilling promises made to earn the trust of our stakeholders. We are committed to upholding the highest standards of lawful and ethical conduct, and in demonstrating honesty, fairness and accountability in all of our dealings

Exceptional Performance

Always pushing ourselves to deliver benchmarked outstanding performance. We are determined to be the best-in-class in what we do. Whilst we are tough with performance standards, we are compassionate with people - we call it "Performance with a Heart"

Our core UI.EP values serve as the foundation of our operations, driving us to provide agile, quality and reliable services and conduct business with integrity, honesty and transparency. We have defined the positive and negative behaviours of UI.EP to cultivate the right behaviours in our organisation.

In 2021, we completed a refresher of our Culture Framework, which now focuses on The Winning Culture. The Winning Culture is supported by the Axiata Way, our unique identity of taking a balanced approach in how we do business anchored on our UI.EP values.

To further instill UI.EP values within our employees, we held our Axiata Integrity Month at the end of 2021. The programme included a refresher workshop and specialised training on UI.EP. Risk, Compliance and Governance on UI.EP was also carried out to ensure we constantly integrate UI.EP values across all operating companies for targeted stakeholders.

In 2022, we plan to communicate the refreshed Culture Framework to create awareness and increase alignment across the Company. We will also conduct design labs with selected members of the Company to help ideate and proposed for solutions in inculcating the right behaviours.



Fair Employment And Welfare



OUR KEY INITIATIVES

Enhancing Group-wide Collaborative and High-performing Standards

Our Group People Division implemented revised and new strategies in the year to enable stronger governance towards people management that leverage on the skills and capabilities across our operating markets. This new way of working, which nurtures a collaborative and synergised workforce between and among OpCos, strategically positions digitisation and a winning culture.

Organisation 5.0 – People Strategy: The Winning Culture

Our People strategy will leverage on organisation effectiveness, nurturing people capabilities and maximising potential of our workforce to create an inclusive and winning culture.

This strategy has identified five strategic priorities, driven by execution in two focus areas.

PEOPLE STRATEGY → PEOPLE STRATEGIC PRIORITIES

→ FOCUS AREAS



Optimising Collaboration in our Workforce Management - People Function Circles

Across the Group, our People function activated and re-energised various 'circles' anchored on operating principles to share knowledge, leverage on each other's strengths and co-create leading solutions. The circles serve as a mode of engagement that abides by the design principles to bring harmonisation while taking into account the individual nuances of our business and markets

There are 7 circles that make up the People Function



Amplifying Winning Culture

We continuously strive to create a winning culture as a key driver towards our goal of becoming The Next Generation Digital Champion. The Winning Culture is supported by three pillars:

- The Axiata Way
- Our Core Values
- Axiata Modern, Agile, Digital (M.A.D.) culture

The Axiata Way is our unique identity which allows us to take a balanced approach to work, with our agility and innovation acting as a catalyst to meet our targets and achieve our vision and purpose without compromising ethics and integrity.



Fair Employment And Welfare



OUR KEY INITIATIVES

Diversity and Inclusion

We strive to create an environment that is conducive to collaboration and excellence built on diversity and inclusiveness across. This is not just limited to age, gender, race, nationality, culture, and skills. We also define diversity as providing our employees with a range of opportunities to advance professionally and personally; and leverage on inclusion to build diversity in our workforce.

Our approach to diversity and inclusion is formalised by our Code of Conduct, which is informed by our core values and incorporated in our operations, interactions with stakeholders and the way in which our suppliers are expected to conduct themselves while doing business with or for us. To further promote diversity and inclusion, our Code of Conduct also prohibits all forms of discrimination.

We are dedicated to creating an environment that promotes collaboration across an ecosystem of differences regionally, recognising that diversity is a business imperative that provides us with a competitive advantage. We have put in place a Group-wide strategy on diversity, equity and inclusion.

Axiata Code of Conduct - Governs our behaviour within our workplace and fosters respect and consideration among all employees regardless of gender, age, ethnicity, language, cultural background, physical ability, religious belief, and lifestyle choice.

Axiata Diversity, Equity and Inclusion Framework

In 2021, we developed our Diversity, Equity and Inclusion Framework (DEI Framework). Strengthened by internal assessments and our signing to the United Nations Women Empowerment Principles Charter early in 2022, we will continue to roll out initiatives supporting our DEI agenda.

The framework establishes Axiata's key focus areas via 4 pillars. These are:

Gender

Generational

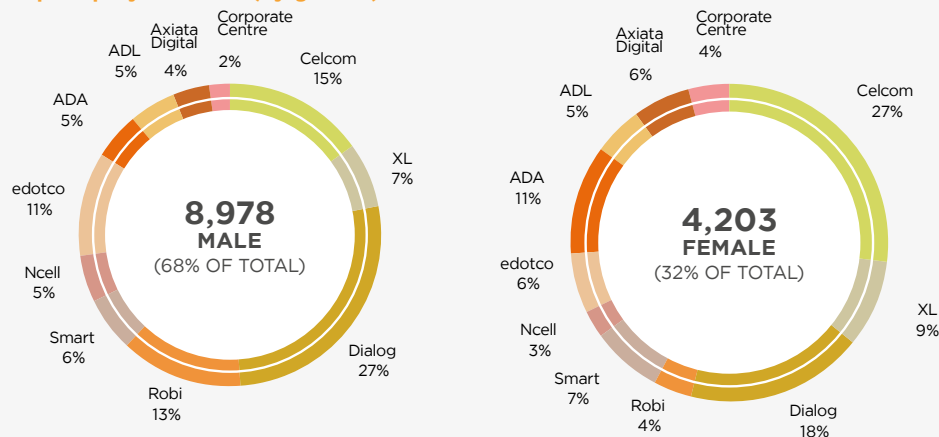
Ability

Ethnicities

The framework has also identified Capabilities as an enabler which cuts across all four pillars.

The DEI Framework is also aimed at influencing change beyond our workplace into our marketplace and community. This will entail considering best practices which can be embedded into our supply chain as well as working to improve diversity, equity and inclusion in the community that we operate in. We have also established a Culture, Engagement and DEI Circle with representatives from all OpCos to aid us in ensuring its in all our markets, as well as drive its adoption.

Group Employee Profile (by gender)



32%

Female employees
Group-wide

20%

Leadership
positions¹ held by
women

2.0:1

Average Group-wide ratio of standard entry
level wage vs local minimum wage for women

+54% increase
from 2020

Note: ¹ Women in Senior Management Teams (CEO-1) across OpCos and Group. Indicator in 2021 expanded to now cover all under Group.



Fair Employment And Welfare



OUR KEY INITIATIVES

Gender Inclusivity

We believe that gender diversity inspires innovation and creates opportunities for our business. To this end, we continuously strive to create a culture of equality committed to greater female representation in senior leadership and key technical roles across the Group.

In supporting gender inclusivity, and in driving female representation in our workforce, during the year we initiated several measures as well as organised and participated in women empowerment events including:

Women of Axiata and Male Allies

- Established women circle including male advocates, Women of Axiata and Male Allies (WAMA)
- Selected two senior women employees to Leadwomen's Women in Leadership Programme to prepare them for leadership roles
- Selected WAMA members attended the Leadwomen's UN Women Implementation Training to increase their knowledge in creating a safer and more inclusive workplace

Women leadership

- Axiata Group Berhad joined the 30% Club - represented by Axiata President and Group CEO Dato' Izzaddin Idris
- 30% Club subsequently joined by ADA CEO, edotco CEO, Chief People Officer and Director of Risk and Compliance, as well as representatives from Boost and Axiata Digital



Institutionalising gender diversity and inclusion into policies, practices and standards

- edotco enhanced HR policies and procedures (for paternity and marriage leave). Three days of leave for paternity and two for marriage leave
- edotco also established Diversity Council to prioritise and discuss diversity-related matters with greater emphasis



Upskilling on gender policy and practices to integrate into business

- Celcom developed a Women Empowerment Principles Implementation Training to develop diversity policies and practices



Axiata Young Talent Programme (AYTP) championing diversity

- AYTP partnered with Girls 4 Girls Malaysia to promote change in the community by helping young women starting out in their career
- Organised the Axiata Virtual Girls Coding Challenge (AVGCC) Programme under the AYTP umbrella, through which we successfully empowered 50 undergraduate women to pursue career opportunities in ICT fields

Empowering Male Wellbeing with Movember

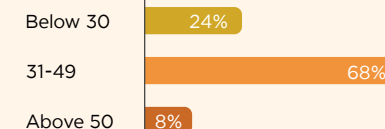
- An awareness campaign on men's health issues to encourage edotco male employees to take proactive steps in taking care of their wellbeing, with a webinar and speaker from the National Cancer Society of Malaysia (NCSM)



Age Diversity and Inclusivity

As a digital company, we recognise our responsibility for equipping our employees with adequate digital skills across all generations, irrespective of age and experience.

Age Diversity



With the diversity in age across our footprint, we value the contributions that intergenerational collaboration can have on workplace innovation and success. In 2022, as part of our DEI commitment, we began roll-out of Axiata's First Intergenerational Mentorship Programme. Teams are formed based on interested participants, with each team consisting of one Senior Leader, one Middle Manager and one Junior Executive. The programme aims to provide the opportunity to connect and collaborate to foster and embrace intergenerational values.

We are also committed to developing emerging talent while simultaneously preserving the intellectual wealth of previous generations. Our flagship talent development programmes, such as AYTP, XL Future Leaders and SmartEdu have established structured pathways that aim to empower and grow aspiring CEOs even outside of Axiata's doors. These programmes have also enabled us to adapt and implement our workplace strategy for developing future leaders, in line with our philosophy that nation-building begins with the development of young, gifted persons into tomorrow's CEOs.

Skills Diversity

Skills diversity are of ever-increasing importance both at the workplace as well as in daily life. In line with our target of becoming The Next Generation Digital Champion, we also require skills diversity to enhance our business and culture. While some skills are innate, others are learned. At Axiata, we always welcome talents with the right skills and values who will bring the greatest value to our workforce. In turn, we offer employees exposure and training in the latest technological developments in line with our digital-ready identity.



Fair Employment And Welfare



OUR KEY INITIATIVES

Employee Engagement

With pandemic restrictions gradually being lifted, our employee engagement initiatives for 2021 centred on finding ways to provide employees with a sense of normalcy amid new normals.

We continued to conduct our regular townhalls Group-wide and regionally to engage with our employees.

We also carried out targeted engagement sessions to enhance employee morale including Group CEO meetings with divisional departments, webinars/hybrid events such as mental health webinars and Axiata Champions, which showcases individuals that lead through their words, actions and values, as well as advance their organisations and nation in their day-to-day roles. In the year ahead, we aspire to continue with employee engagement programmes, as well as increase the number of our targeted engagement activities.

Employee Satisfaction

Employee satisfaction is crucial for promoting growth that is directly linked to company performance. Engaged employees are committed, motivated and creative, which translates to excellent customer service, enhanced value creation and an inclusive culture where everyone feels valued.

We conduct employee surveys annually to gain employee feedback and improve their experience. The surveys cover a range of issues relating to our workplace culture, business strategies, needs and expectations from our key stakeholder group: Our employees. In addition to surveys, we utilise other methods to collect employee feedback, including conducting pulse surveys across the year, annual formal employee satisfaction surveys, townhalls and smaller channels of appraisals.



Note: ¹ Group-wide survey conducted by an external party, excluding Celcom, ADA and Axiata Digital that conducts their survey on a separate platform

In 2021, we conducted surveys across our Group with the following results:



91%

engagement score



93%

participation rate
for Group Employee
Engagement Survey¹

The surveys were conducted by external vendors, delivered online and available in the languages of OpCo markets. Results were then consolidated at the Group level to maintain oversight on employee satisfaction across our footprint.



Talent Development



Axiata invests in hiring, training and retaining the best talents to embody our identity as a digital-first organisation that is at the forefront of technological advancements. In our quest of further embedding exceptional performance across our organisation, we foster a culture of innovation that not only advances the company, but also ensures employee satisfaction.

Our approach to talent recruitment, training and retention are set out in our Organisation 5.0 – People Strategy.

GROUP AVERAGE TRAINING HOURS PER EMPLOYEE IN 2021, BY CATEGORY



Male

34.0[^]



Female

31.1[^]



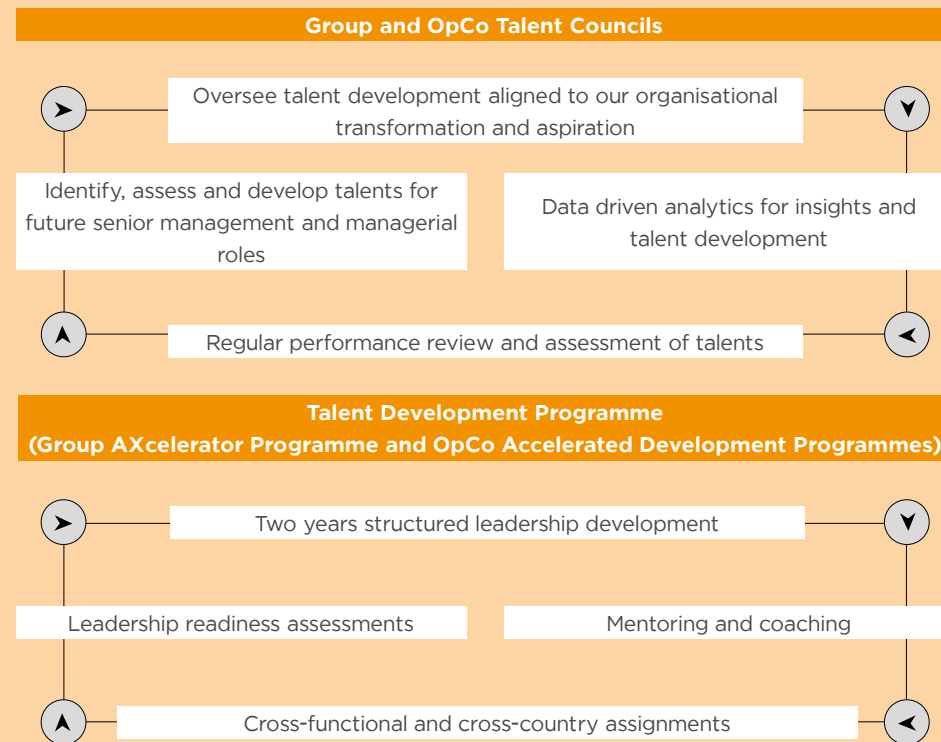
For a full breakdown of employee category across Group, see page 126.

Note:

[^] This data has been externally assured. Refer to the Independent Limited Assurance Report on pages 130 to 132

APPROACH

Axiata Talent Management Framework



Our Group Talent Management team is responsible for finding qualified talents who are capable and motivated to uphold Axiata's standards. To encourage employee retention, we implement rigorous talent development programmes oriented towards empowering staff to respond to rapidly changing customer demands and work processes. We also undertake continuous employee engagement, offer attractive performance-based recognitions and ensure the provision of a safe and healthy work environment.

In line with our Group Strategy, our OpCos have also crafted policies and strategic frameworks designed to attract, identify, develop and retain the best talents. The policies outline the OpCos' execution of ensuring development of talent towards a high potential workforce.



AXcelerator Programmes

Our Axiata Group Accelerated Development Programme, AXcelerator, and OpCo Accelerator Development Programmes (OADP), identify individuals that have the potential to enter leadership roles.

AXcelerator (Top-level) identified:

128

OADP (Middle-level talents) identified:

637

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.



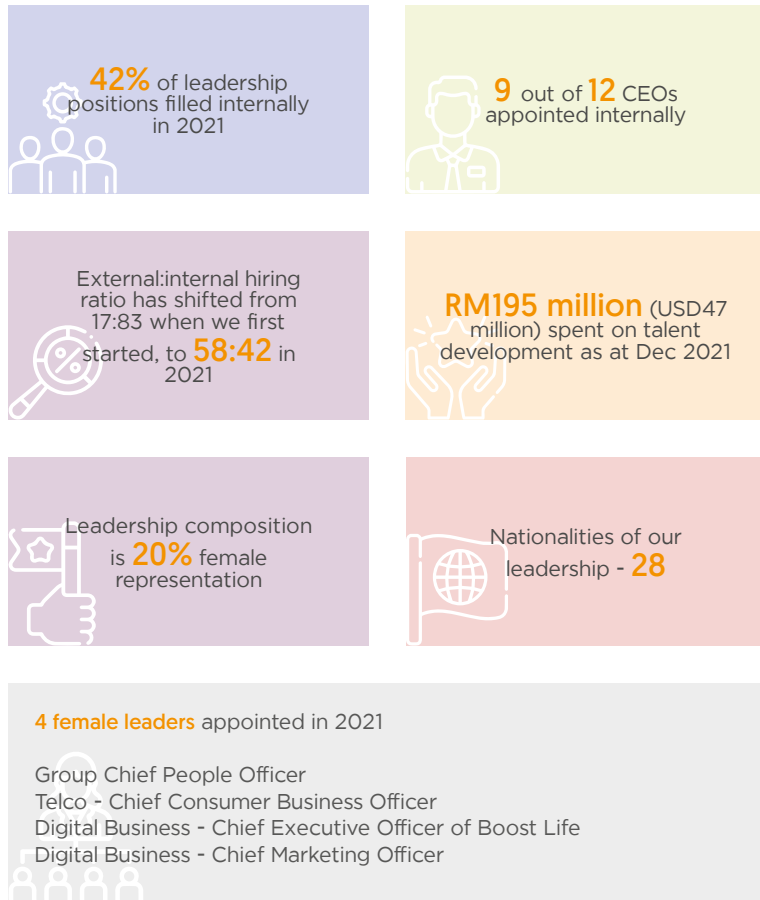
Talent Development



OUR KEY INITIATIVES

Truly a Talent Factory

Our commitment to human capital development has resulted in the delivery of our UI.EP values and progress towards being The Next Generation Digital Champion, making Axiata a true “talent factory.” To date, the following accomplishments have been documented:



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

Employee trainings focus on key scopes defined for our respective OpCos' year-long training strategy. These are based on our M.A.D pillars as well as other critical pillars in our organisation's employee life cycle. To further integrate a M.A.D culture within our employees, we have invested in digital online learning platforms, which have become central to our staff training and development. These platforms have made learning available to all workers across our OpCos:

Axiata Fast Forward

Our virtual university of seven academies offers curated learnings based on competencies and career development opportunities. For example, Data Citizen programmes cultivate digital and data savviness in the wider workforce, regardless of roles, as part of collective skills towards developing Digital Champions.

Fuse

A digital platform that enables wider access and reach on training content and learners' communities. A platform that offers blended, contextual and personalised learning, enabling employees to participate in focused-learning communities in one seamless ecosystem. To allow Fuse to offer more to each of our OpCos, the platform will be used to curate customisable and personalised learning journeys based on employees' skills profiles. This initiative is currently adopted for Axiata Digital Services (ADS), where we plan to pilot a Fuse ADS Community Champion programme to further encourage the culture of learning across the organisation.

Building business knowledge libraries through synergy



In line with Axiata's ambition to be a Digital Champion, we have been enhancing our knowledge sharing and retention platform to ensure sustainability of our group. As part of our of our enhancement, we have taken a user-centric product-driven approach resulting in improved engagement Group-wide of 25% YoY.

OpCos have been actively sharing and learning from each other with information being shared onto the portal having increased by 36% compared to 2020. Information consumption also increased significantly by more than five-fold from 2020.

One of the most shared knowledge across the group with a dedicated section in itself has been “Axiata New Norm – COVID Response for Business Sustainability”, in which OpCos share best practices, learnings and ideas they have implemented to ensure business sustainability amidst a pandemic.

Recognising exceptional performance among our workforce

100%[^]

employees receiving regular Performance Reviews

We recognise achievements among our staff as part of our UI.EP core principles. To extend our gratitude for our best performers, we celebrated our top performing employees at our annual Axiata Champions recognition awards via a virtual event. Axiata Champions is a Group-wide programme where employees compete based on key performance indicators (KPIs). The awards are given within each OpCo and across the Group, serving as a way for us to acknowledge and validate outstanding individuals for their accomplishments and value that they offer to our organisation.

Note:

[^] This data has been externally assured. Refer to the Independent Limited Assurance Report on pages 130 to 132



Employee Health, Safety And Wellbeing



We recognise that a healthy and safe workplace is crucial to employee wellbeing, particularly amid the prevailing pandemic environment. At Axiata, our employees are provided with access to a range of wellness programmes such as exercise classes, health assessments and healthy living benefits aimed at building a healthy work environment that promotes work-life integration, physical and mental health and safety.



OUR KEY INITIATIVES

Health and Safety

Safety is integrated across our operations through the implementation of Environmental, Safety and Health (ESH) systems and monitoring processes. Every year, we ensure that knowledge and awareness are reinforced through training programmes that cover general topics as well as skill-targeted topics. Refresher courses are also made mandatory for job roles that experience higher risk hazards, such as working at heights or on-site and emergency response, among others. Site supervisors are also required to complete Competency Programme sessions.

Across OpCos, information pertaining to general health and safety is also frequently communicated for employee-wide understanding and practice of workplace health and safety. Additionally, we have implemented digital systems to monitor risks and hazards, including accident-occurrence data as well as put in place organisational performance measures toward meeting targets set in our health and safety plan.

APPROACH

Axiata is committed to complying with all applicable environmental, health and safety laws and regulations, and to maintaining and improving management systems to ensure environmental responsibility and employee safety. Our Group Health and Safety Policy is cascaded to each OpCo, which are responsible for reviewing their respective policies annually and understanding its provisions, on top of ensuring that employees comply with the rules and regulations. Workplace risks are

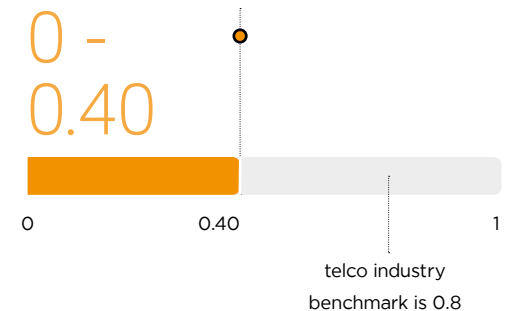
identified through regular reviews and internal assessments of our operations followed by any necessary remediation and risk mitigations.

In addition to meeting local regulations, our OpCos also comply to international standards and management systems, ranging from Occupational Health and Safety Assessment Series (OHSAS) certification to ISO45001:2018.

OUTLOOK

We will continue to prioritise the health, safety and wellbeing of our employees. This will cover the care we provide to our workforce Group-wide as well as managing and monitoring our health and safety indicators to ensure rapid and appropriate action. As we continue to adapt our workplace to the new normal, we will also update our programmes to respond to our employees' expectations.

Average Lost Time Injury Frequency Rate across OpCos from





Employee Health, Safety And Wellbeing



OUR KEY INITIATIVES

Employee Wellbeing



AxiataCares – Strengthened Axiata Cares from 2021, reflecting our Employer Value Proposition (EVP) of total wellbeing, health and safety, career and personal growth and connectivity to the communities via volunteerism and sustainability initiatives. This embodies our philosophy of People First, Always.

AxiataCares caters for the employee experience through channels that nurture mutual trust between the employee and the company, fosters a conducive environment of partnerships and friendships amongst colleagues and enables them to meaningfully contribute to communities externally.



1. Wellbeing : Physical, dietary and mental
2. Safety : Physical and psychological
3. Work : Modern, agile, digital ways of working
4. Growth : Personal growth and professional development
5. Environment: Sustainability
6. Community : Volunteerism, diversity & inclusion



Celcom conducted various employee wellbeing initiatives throughout the year, including townhalls, ‘Jom Hangouts’, department-specific conversations and specialised celebratory events such as International Women’s Day.

- Health talks included speakers from Health Advisors on topics such as managing stress and anxiety at work
- Wellness programmes, such as ‘Fight2Fit’, were delivered to employees to ensure commitment to wellbeing in the workplace is managed and maintained
- The introduction of a ‘Focus Hour’ for a one-hour slot twice weekly to allow time for deep work was successful in that 57% of employees used this slot at least once a week since its launch



Across XL, regular engagements and communications were maintained to prioritise its workforce’s wellbeing.

- Through digitised communications, XL leveraged on apps such as Xlife, covering employees’ needs and maintain dynamic communications among the workplace environment
- Employee volunteerism was also strengthened, especially during the challenges of the pandemic on the country, with programmes including employee participation in the Sentra Vaksinasi Indonesia Bangkit (SVIB) vaccination drive



Dialog’s employee wellbeing initiatives focused on the provision of safe and secure work places, stringent health and safety policies, learning and development and the protection of the employees’ livelihoods. Also, efforts were placed on empowering its workforce during the challenges of the pandemic

- Invested significant efforts into implementing a comprehensive awareness and training regime on stress relief, ergonomics and similar topics related to securing employees’ physical and mental wellbeing, while adapting to the ‘Work From Home’ model



Robi conducted various employee wellbeing initiatives, mostly through online platforms, yet with success in outreach and participation.

- A month-long wellbeing campaign was launched, on ways to effectively prioritise wellbeing as a lifestyle. This was also supported after the programme through the launch of a wellness newsletter to employees
- Digital engagement initiatives embraced the hybrid work culture with strengthened end-to-end workplace solutions offered digitally. These included HR Chatbots and digitised claim portals to facilitate a digitally-driven workforce



Smart addressed wellbeing initiatives through programmes that supported hybrid work environments

- Employee wellbeing and wellness initiatives included weekly wellbeing contents on Yammer, Lunch Box delivery to employees’ home, Food Support Pack during the lockdown, Food and Fruit support to employees in quarantine
- Smart Identity Workshop provided to employees to create understanding, commitment and ownership to live Smart’s mission, vision and Core Values
- Supported employee wellbeing and wellness by posting weekly wellbeing contents on Yammer, lunch-box delivery to employees’ homes, Food Support Packs to employees who are in quarantine, in lockdown areas and to those who tested positive for COVID-19



Ncell’s employee engagements encompassed initiatives from mentorship programmes to nurturing principles of care and communication. These were through townhalls, pulse surveys, traineeships, mentorships and idea labs.

- Introduction of ‘Zero Hour’ to facilitate focused time for self engagement
- Special Communications with updates and guidelines while Navigating COVID-19
- Yoga retreat sessions with experts
- Health sessions with renowned doctors on topics including preparing for second wave of COVID-19, COVID-19 and Dietary Recommendations, COVID-19 and Child Care, Coping with COVID-19 and Risks of New Variants, Taking care of eyes in digital era, among others



edotco continues to encourage employees to volunteer for our Corporate Social Responsibility (CSR) activities through our Employee Voluntary Engagement (EVE) programme. These activities allow employees to be personally involved with our sustainability programmes/efforts and give the opportunity to contribute back to the society.

COVID-19 Response

We continue to support our employees’ wellbeing amid the persisting COVID-19 pandemic by maintaining hybrid working arrangements and health screening prior to entering the office. We also conduct safety training and online awareness sessions using virtual formats, and new training on COVID-19 related risks.

Customers

Serving more than 163 million subscribers across the region, our customer experience management is a high priority to us, ensuring that as a group of companies we are able to contribute to society by enabling quality connectivity for all - affordably, safely and reliably. We have seen an increasingly growing demographic globally that expects continuous connectivity for work or play. Whether a result of the pandemic's new way of living or reaching for greater opportunities through digital or telco means, customers now expect to remain online and participate in the digital ecosystem one way or another.



Customer Service



As a digital telco, the cornerstone of our business is to ensure we provide the tools for society to remain connected in the regions we operate. In tandem with this, we also place emphasis on providing holistic services by managing the risks and opportunities of customer experience and satisfaction and incorporating these into our processes, products, services and solutions wherever possible.

APPROACH

We have created digital lifestyle products as well as modernised and designed seamless digital platforms to meet the needs of an increasingly digital economy and provide a customer experience in line with society's expectations. In tandem with the provision of connectivity, we have also embedded our commitment to cyber security across all our digital platforms to ensure the privacy of customers is safeguarded. We seek to deliver a safe and secure network, driven by multi-channel touchpoints to provide seamless customer convenience and bring us closer to our customers.

As part of our Axiata 5.0 Vision, we have identified digitisation and modernisation as our means to achieve operational excellence for customer value creation. In the face of the prevailing economic landscape and shifting societal pressures on connectivity, our OpCos have demonstrated operational excellence to capture new normal opportunities across the region arising from higher data consumption and growth in digitalisation. To enrich our customer's experience and capabilities through connectivity, we conducted holistic internally-led initiatives, under the LEAP NOW Programme, on our products and services, taking into account a user's UI-UX journey experience. For more information on the solutions submitted through LEAP in 2021, see page 43.

OUTLOOK

As part of the execution of Axiata 5.0, we will continue to emphasise digitisation opportunities for our customers to anchor their experience.

Committed to offering our customers excellent **network reliability** and access for the best network and service experience



See Network Quality and Coverage in **SNCR** for more information, page 25.

Responsibility to **protect the data** that our customers, employees and other stakeholders have entrusted us with



See Data Privacy and Cyber Security for more information in **SNCR** for more information, page 91.

For our customers

Provision of services that ensure **we maintain trust and confidence** of our customers



See our Operational Excellence performance in **IAR** for more information, page 37.

Promotion of **ethical business activities** in how we operate internally and with our business partners and suppliers



See Business Ethics and Compliance for more information in **SNCR** page 88.



Customer Service



OUR KEY INITIATIVES

Customer Sentiment as a Driver of Performance




In understanding customer expectations, requirements and their challenges, we are constantly tuned into the feedback they share across our platforms. Primarily, we undertake a range of surveys across our markets, as well as leverage **data analytic capabilities**. In this way, we are better able to analyse and identify problems using our internal systems and capabilities that are driven and supported by data analytics. For example, we have been able to undertake customer profiling, segmentation and track customer sentiments for better performance representation. These AI-driven insights prompt swifter data processing, efficient and better-guided decision-making on the forums which we use to evaluate our performance. We then incorporate feedback into the design of newer or refined service solutions.

We also place emphasis on collecting better feedback from our customers. Across our OpCos, we continue to provide diverse channels for enabling customer feedback across the relevant touchpoints on the customer journey. These include our website, app or accompanying portals and physical or digital sales and support hubs. This feedback is actioned into continuous refinement of our services and quality to better serve our customers.

Digitising Customer Experience

We leverage on our analytics community across Group to offer products and services that enrich the digital lifestyle of our customers. We harness tools such as process automation, data analytics and intelligence to enhance customer onboarding, shorten turnaround time and offer relevant and improved services. These tools have also proven insightful in analysing purchase behaviour, response to our products and services as well as brand perception, among others.

Digitising the customer experience

 PURCHASE OF OUR PRODUCTS	 QUALITY IMPROVEMENT EFFORTS (AFTER SALES SERVICES)	 PRODUCT QUALITY CONTROL	 PROMOTING THE SAFE USE OF PRODUCTS
<p>Support through web platform, apps, chatbots</p> <p>In-app gamification for campaign engagement</p>	<p>Sales support, automated or assisted with data analytics and portals</p> <p>UI/UX journey enhancement to maintain standard of online portal performance</p> <p>Bill payment automation and accessibility</p>	<p>Ensuring product or service has met the customer's need with value-added services and capabilities</p> <p>Enhanced Interactive Voice Response (IVR) capabilities with improved call retention performance</p>	<p>Information sharing online, through the website and apps, on responsible and safe use of online services (multilingual in some OpCos)</p>



Customer Service



OUR KEY INITIATIVES

Customer Satisfaction

We have put in place multi-channel touchpoints to provide seamless customer convenience and bring us closer to our customers. These touchpoints also allow us to respond to their feedback quickly as well as review and improve our customer experience. As a key metric for the Group, we continuously track relevant customer satisfaction scores and performance indexes across OpCos to maintain an eye on our performance and fulfilment to societies in the countries where we operate.

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.

Building on the strength of our networks, platforms, services and people that help us deliver our brand promise, our customer experience metrics have improved on average. More of our OpCos are ranked number 1 in their respective markets across the three different scores. This demonstrates the degree of customer satisfaction in our services and we are committed to continue this positive trajectory.



OpCo Rankings in Respective Markets

Net Promoter Score



Digital Reputation Score



Brand Power Score



Suppliers

Our suppliers are fundamental to our operations, providing us with the products and services that support the continuity of our daily operations. In line with our sustainability agenda, we also hold our suppliers to high standards of business conduct, including ensuring sustainable practices.



Supply Chain Management



Globally, the Group works with an extensive network of over 5,600 suppliers. This supply chain covers categories from equipment and infrastructure vendors who support our back-end operations, through to device suppliers that enable us to meet society's connectivity needs and the IT services that drive our operations.

APPROACH

Our supply chain management is governed by Axiata's Procurement Policies and is driven through OpCo management operations. Supply chain management across OpCo procurement supports purchasing, manages vendor-related risks, monitors vendors performance and develops new relationships to reduce dependencies on individual suppliers.

To ensure reliability and continuity of our services, we manage the different social, environmental and ethical risks to our supply chain and ensure we can screen, evaluate, empower and monitor our suppliers to meet not only our requirements, but also the expectations of the industry in operating responsibly for society.

Axiata Procurement Centre

- 1 **Sources and procures** strategic Network and IT equipment, solutions and services for Axiata
- 2 **Ensures compliance** of processes across suppliers with Axiata's policies
- 3 **Adapts procurement process** to improve agility in our business
- 4 **Engages with suppliers ethically** - treating suppliers fairly and building relationships

In addition to our accountability to our Procurement Policies, our conduct with our suppliers is also governed by our Whistleblowing/Speaking Up Policy and Procedures. The Whistleblowing Policy and Procedures facilitate our **Speak Up** channel, which is available to our suppliers to voice and register their concerns, including any actual or suspected act or conduct that is in violation of the Supplier Code of Conduct, illegal or unethical behaviour, without fear of retaliation or unfair treatment.

In upholding standards of operating that are aligned to sustainability and in empowering quality of delivery, suppliers that work with us are expected to adhere to the **Axiata Supplier Code of Conduct**. The Code enables us to screen and monitor how our suppliers adhere to sustainable business practices in their operations and dealings, as well as empower suppliers to meet these standards continually in the event these standards are not met. Mitigation measures to assist with compliance to the Code and address issue remediation encourages a dynamic process which enables suppliers to continuously improve and ensure they adhere to or exceed these standards.

We are also committed to working with our suppliers on Environment, Social and Governance (ESG) sustainability factors to ensure continuity and stability of their businesses, our operations and responsible global connectivity needs. This also maintains Axiata's competitiveness and operational standards while incorporating ESG elements across all aspects of our business dealings, and dealings of those we work with.

OUTLOOK

Effective supply chain management plays a vital role in managing our performance and exposure to supply chain risks. The performance and responsibility of our suppliers also impact our own services and extend across our ecosystem. In view of this, we will continuously collaborate with our suppliers to enhance industry standards across our value chain and beyond our supplier community. We intend to integrate more positive attributes to our suppliers through our supply chain dealings, such as increasing their attention on sustainability management. With the increased efforts in the year ahead on understanding and reducing our Scope 3 emissions (emissions of our suppliers) we aim for a collaborative approach towards meeting larger industry and national climate goals.



Supply Chain Management



ESG elements across our supply chain from compliance with Axiata Supplier Code of Conduct



Environment

Ensures due diligence and monitoring of environmental parameters in the course of their operations and dealings



Social

Ensures workers in our supply chain work under safe conditions, are treated with respect, dignity and non-discrimination in accordance with labour standards, and avail to freedom of association



Governance

Ensures compliance to the relevant laws, regulations and legal requirements, ethical business conduct as well as ethical and responsible data privacy with cyber security management

OUR KEY INITIATIVES

Supplier Engagement, Screening and Performance Management

Supply Chain Collaboration to Unlock Value

During the year in review, Axiata Procurement Centre conducted a virtual supplier forum which brought together 100 participants from 33 of the Group's key suppliers across our mobile network operations. Through sharing of best practices and insights to areas of collaborative partnerships for the industry, the forum aimed to identify opportunities on how the suppliers can partner with us on collaborative optimisation, develop synergies and bring additional value in delivering high dividends promised to our shareholders. Topics covered during the forum included cost optimisation, efficiency improvement, digitisation and revenue generation.

Strengthening Skills and Responsible Business Operations

Our OpCos provide their suppliers with training on various areas in contributing to delivery of products and services and empowering supplier capabilities. These trainings are specialised to on-the-ground management of suppliers and utilise engaging platforms to upskill and develop relationships. These efforts are targeted at raising our suppliers' operational excellence as well as ensuring alignment of their performance with our own goals and performance.

Throughout the year, various engagements were held on operational excellence, including labour standards and contracting efficiencies. The engagements also focused on compliance and integrity as a business imperative across all supplier activities and transactions, ensuring fair, equal and transparent business practices across our organisation.

Value-add to suppliers through engagements and trainings

- Health, safety, security and environment awareness and training for **safe, responsible ways of working**
- Process and risk mitigation awareness to suppliers for **heightened risk management** along our supply chain
- Awareness and briefings on conducting business fairly with ethics and integrity, in compliance to Axiata's policies (eg, No Gift Policy, No PO no work)

- Anti-bribery and anti-corruption awareness and training for compliance to Axiata's strengthened focus on **ethical business conduct**
- Training on **digitising processes** of suppliers from supplier registration to screening documentation and contracting

As part of supplier screening for compliance with the Supplier Code of Conduct, suppliers are screened against environmental and social parameters. Following an update of the rigour and terms of our Supplier Code of Conduct in 2020, which added Anti-Bribery and Anti-Corruption (ABAC) and data protection as areas to strengthen the growing risks of ethical business conduct and data privacy, we have been empowered by the compliance of our supply chain partners to strengthen their practices and enable continued relationships and delivery of quality, reliable services within our ecosystem. During the supplier screenings, where risks may be identified, we conduct on-site audits to work with suppliers on addressing and remediating these issues. These audits and annual reviews also enable us to update and review our screening process during the course of our supplier relationships.



Supply Chain Management



OUR KEY INITIATIVES

Common Platform for Enhanced Supplier Data Analytics

To better manage our operational risks, including monitoring continuity and safety of our products and services from across our supply chain, we increased our focus on centralising our supplier process with digital capabilities for strengthened visibility of data across our supply chain. In line with the replacement of existing supplier databases towards a common platform for Group, we transitioned five out of six OpCos onto this system in 2021. We expect to continue this for all other OpCos to provide us with better oversight on our suppliers by identifying strengths and addressing any potential risks.

Driving strengthened risk management, risk visibility and compliance to regulations

Monitoring supplier performance to offer customised trainings and awareness

Automated follow-ups and retention of documentation for transparent system flows

Innovators have begun to **embrace next-generation systems**, that benefit direct operations but also indirect operations including those in supply chain. Modernising with technology, data and softwares speed up decision-making and pave the way for autonomous, better-guided planning

For OpCos that have yet to be onboarded onto the transformation programme, we encourage advancements in digitising their supply chain operations and practices in ways they have identified to harness operational and resource efficiencies.

Empowering Local Vendors in our Operating Markets

We strive to maximise local suppliers in each of our footprint markets to reduce the transport of goods and services, lower emissions and improve environmental outcomes. We also seek to contribute to socioeconomic multipliers in our local economies, where local suppliers can benefit from employment and business opportunities. Being closely located to our suppliers has also allowed us to develop more meaningful relationships with them, in addition to reducing risks related to our suppliers' labour conditions, as we are able to exercise more oversight on the treatment of their workforce when they are located in our market.

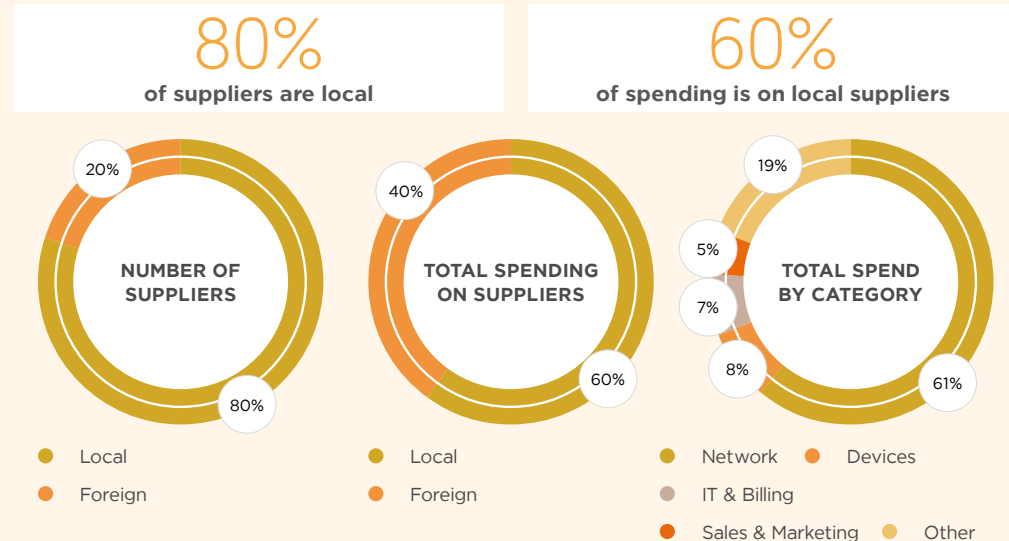
Spent **52%^{1*}** of total spend on **local suppliers across Group** (MNOs, TowerCo and Corporate Centre)

Notes:

¹ Proportion of total spending on suppliers above represents an average percentage across the OpCos. Refer to page 126 for details

* This data has been externally assured. Refer to the Independent Limited Assurance Report on pages 130 to 132

Supplier spend across MNOs and Corporate Centre



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



Supply Chain Management



OUR KEY INITIATIVES

Vendor Development Programmes in Our Home Country

As a home-grown champion in Malaysia, we value our responsibility of contributing to vendor development in our home country.

While the pandemic has impacted our regular vendor development programmes, we continued to strive in support of our vendors during the year. This included activities undertaken through edotco and Celcom:

In 2021, focus for VDP vendors was to make them a competitive vendor for the local market through competitive pricing

- Grass 2 Route was awarded Civil Mechanical & Engineering (CME) works under Colo and B2S contracts
- Virtech Engineering was awarded CME works under Colo and B2S contracts
- Both vendors have been given business opportunities in other business streams to boost their business growth and profitability.



Celcom Vendor Development Programme supports and develops local vendors within the digital ecosystem. In 2021, one vendor, Grass 2 Route was awarded RM950,000 that matched with the Ministry of Finance (MoF). We also proposed the use of their Tuleva product to MoF.



50 vendors in Celcom Vendor Development Programme:

- 7 National Champions and 1 Global Champion from the programme
- RM595K value of training courses from technical agencies
- 10 business matching events organised for more than 120 vendors
- RM2 million in research and commercialisation grants awarded to three vendors

Empowering Suppliers to Reach Global Climate Goals

Effective climate action and the attainment of net-zero emissions goals require global engagement to address and reduce emissions from all parts of the value chain.

With net-zero as well as Scope 1 and 2 targets addressed through our operational oversight, we are now committed to addressing our entire value chain, where a significant proportion of our environmental impact arises from the manufacture, purchase and use of our products (upstream and downstream).

Through Axiata Procurement Centre (APC), we possess oversight on our mobile network operations OpCo suppliers, supplier spend and direction. This enables appropriate supplier engagement for capacity-building and national contribution in the countries we operate.

We are currently undertaking Scope 3 screening of our suppliers to determine our areas of control towards developing a Scope 3 inventory and baseline. This will subsequently allow us to identify a science-based Scope 3 target for 2030. This exercise builds on our work with our suppliers to evaluate their level of sustainability and support them to better manage their sustainable and responsible business practices.

We also recognise that a circular economy requires redesigning the supply chain around circular principles to reduce raw resource use and ensure the development of a holistic climate strategy. While there currently exist barriers such as regulatory challenges in resource extraction and e-waste management and reuse, we will seek updates, research and methodologies from our industry peers and associations in this emerging field.

Society

Social relationships are the foundation of society. We take pride in the relationships we have with our communities. Axiata makes a positive contribution to society by developing critical digital services, providing modern infrastructure, on top of generating employment.

In fulfilling our responsibilities to create value for society, we have invested in developing the various communities we engage with. Our regional presence puts us at the heart of diverse, local communities striving to participate in rapid socioeconomic growth. To meet the unique socioeconomic needs of each country we operate in, we undertake various community development programmes across our Group, from providing access to education, basic utilities and healthcare, among others.



Community Development



Through financial and non-financial contributions to support local communities, underprivileged and underserved groups, we are committed to supporting the principles of 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 and empower the youth 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.

AXIATA FOUNDATION

Axiata Foundation has expanded its reach, impact and commitment to providing for our local communities by expanding its pillars to now encompass Education, Environment and Community Investments.

In 2021, the Foundation pledged RM115 million for the next 10 years to be channelled towards its **Education** pillar, including its flagship Axiata Young Talent Programme that will continue to provide immense opportunities for nurturing local talent.

Leveraging the impact and societal value creation from the existing Education pillar, the new pillars of **Community Investments** seek to enrich and empower communities through digital inclusivity, while **Environment** seek to empower communities to do their part towards green and sustainable development.

Driven by ESG, built on 3 Pillars with A Clear Purpose



APPROACH

We create and implement programmes and employee initiatives that leverage the Group's pooled resources of digital services, business competence, and the expertise of our staff to establish a purposeful impact to our communities. This involves digital enablement initiatives to advance a more digital society, providing access to fundamental resources that are a human right, support for disaster management and response and ensuring an overall effort in developing our social license to operate with added value to communities across our footprint.

OUTLOOK

Connecting people to social and economic resources for sustainable development is not just good for business, but ultimately it is the right thing to do. With a strong foothold across our diverse business streams, we recognise the capacity for connectivity and aim to leverage on our expertise to reduce inequalities through SDG impact initiatives. On top of educational programmes and our programmes for community contributions, we strive to build strong partnerships globally with governments, businesses, non-profit organisations, independent firms, and civil society.



Community Development



OUR KEY INITIATIVES

Building Future Leaders

Our investment in talent development among youth comprises one of our flagship community initiatives across our Group. Across our footprint, we continued to implement various youth talent development programmes aimed at building a pipeline of the leaders of tomorrow.

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, **2,693 young talented Malaysians** have benefitted from this programme, implemented in the following leadership development tracks:

School Leadership Development Programme (SLDP)

A five-year programme in partnership with Kolej Yayasan Saad

University Leadership Development Programme (ULDP)

A two-week summer camp for young Malaysian undergraduates

Young CEO Development Programme (YCDP)

A two-year leadership development programme

AYTP Alumni Association

Emerging Leaders Asia in 2020 for alumni to engage in lifelong learning



To date, **1,863** students have graduated from AYTP

A total of 2,693 have benefitted from the various programmes conducted at all levels

XL Future Leaders (XLFL)



XL Axiata's XLFL programme aims to meet the learning needs of the new generation of leading talent, to contribute in various fields to a stronger, more advanced Indonesia. Today, XLFL has more than 1,000 alumni. The initiative carried out the following activities:

Future Skills Programme

XL Axiata Future Leaders were selected as partners in the Future Skills programme organised by FISIPOL UGM in the context of implementing the "Kampus Merdeka" Programme

Ruang Merdeka Inspirasi

Participants of this programme contribute to advancing the surrounding environment according to the localised needs of the area they live in. Close to 200 students attended, from 67 organisations, under 19 campuses across the region.

#Generasi Gigih

As the learning partner, XL collaborated with Yayasan Anak Bangsa Bisa (YABB), and held skills training for young people. The training programme themed #GenerasiGigih was attended by 1,000 participants from various regions.

To date, **1,100** talented Indonesian youths have benefitted from the XLFL programme

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 programmes:

SmartEdu University Student Development Programme (USDP)

This programme aims to nurture and equip young Cambodians with values, critical competencies, and skills needed to become resilient corporate digital leaders of the future.

- 144 participants from three cohorts
- 48 students successfully participated in 13-day stay-in Bootcamp
- Three winning teams were awarded cash prizes, whilst eight top performing students received a two month internship at Axiata Group

SmartEdu Scholarship Programme

This programme encourages bright Cambodian high school students, particularly students who struggle financially, to pursue higher education.

- 20 exceptionally bright and talented students from various backgrounds selected in 2021

To date, **41** talented Cambodian youths have graduated from the SmartEdu Scholarship programme (21 in 2021) and **144** graduated to-date from SmartEdu USDP. In total, **185** students have graduated from the SmartEdu programme.



Community Development



OUR KEY INITIATIVES

Value Creation to Society through Digital Inclusion and Long-term Sustainable Community Development

As a digital business with three distinct business streams, our sustainable business growth is possible because of our value proposition to society. Through connectivity and digital, we are able to ensure communities and overall society can thrive socioeconomically, given the tools to maintain livelihood, employment and access to services.

Within our ambition of becoming The Next Generation Digital Champion, digital inclusion is embedded into how our business can benefit society.

Digital Inclusion

Driving the new digital ecosystem by supporting digital skills development and supporting digital companies

Uplifting communities through digital financial inclusion, business empowerment and providing opportunities for women and girls, as well as diverse users

Providing access to vital services through connectivity, such as healthcare, education and employment

📌 **SNCR** Digital Inclusion efforts on page 29

However, as a corporate citizen, the contribution to community development does not end with our services. Through our presence, leveraging our employee volunteers and making full use of our brand and trust with consumers, we contribute in more ways than connectivity to our society.

Community Development

Supporting education through access to quality education, scholarships and school learning programmes

Connecting to basic utilities through providing rural and underprivileged communities with access to water, power and building urban shared spaces for communities

Contributing to healthcare through donations of healthcare equipment, investments in healthcare providers for communities in need

Employee volunteerism to instil corporate citizenship among our workforce and share values for good contribution to society

Committed to Long-term Sustainable Community Development

One of Axiata's key purposes is to empower societies. The pandemic has made Axiata's role in empowering societies especially clear. We have provided critical connectivity and will continue to do so by capitalising on our OpCos' strengths and expertise, infrastructure, and digital services to bring about impactful changes. Supported also by Group level efforts, we hope to present a united Axiata in contributing to society as a whole in ASEAN and South Asia. In 2021, we continued to focus on programmes encompassing education, connection to basic utilities and humanitarian causes.

Supporting Education

As a technology company, we have the potential and responsibility to pave the way for a digital future, where the next generation is geared towards a future-ready mindset that we apply in our own workplace. To this end, we support the following education initiatives to provide youth with future-ready skills as well as basic education.

Dialog Merit Scholarship



The Dialog Merit Scholarship programme provides financial assistance to high performers at the General Certificate of Education (G.C.E.) Ordinary Level (O/L) and the G.C.E. Advanced Level (A/L) examinations each year. With the aim to encourage students to pursue higher education, the scholarship scheme has assisted over 900 talented students since its inauguration.

Ncell Scholarships and Excellence Awards



- Ncell has continued conferring Scholarships and Excellence Awards to top performing students in Nepal's renowned engineering college - Pulchowk Engineering Campus.
- Ncell aims to inspire young talents, promote academic excellence, and contribute to the development of human resources in the country
- Through this five-year collaboration, Ncell will provide scholarships and excellence awards to 120 top performing students studying in five different faculties over the period of five years.
- Each year, 18 students will receive the scholarship and six students amongst the five faculties will be awarded with Ncell Excellence Awards.

SmartStart High School Edition

The SmartStart High School Edition is a programme aimed to provide basic knowledge of business plans and canvas, including the ideation process. It aims to expose high school students to reflect and brainstorm issues faced by the community, turning them into business opportunities through practical execution. At the end of the programme, participants will be able to gain diversified knowledge and important stakeholder engagement skills.

180 high school students from three different provinces joined the Bootcamp and they were exposed on the concepts around digital business, entrepreneurship, and soft skills. The top three finalists will then be awarded with cash prizes and access to further learning materials.

SmartStart Unipreneur Learning Platform



SmartStart Unipreneur Learning Platform is an educational initiative between Smart Axiata and Impact Hub Phnom Penh. It is the first local online learning and interactive platform that introduces entrepreneurship to Cambodian students via partnerships with universities using a blended-learning approach. The goal of the learning platform is to develop the technical capabilities and entrepreneurial mindsets through the practical implementation of related concepts.



Community Development



OUR KEY INITIATIVES

Connecting to Basic Utilities

Basic utilities are essential services that play a vital role in economic and social development. Lack of access to safe, sufficient, and affordable basic facilities can impact the health and wellbeing of people negatively. Axiata acknowledges the barriers some communities face to obtaining basic facilities and recognises its significant role in tackling these issues. Along with our OpCos, we will continue to work towards initiatives that enhance these services, with the common goal of extending access to services to all communities.

edotco Tower 2 Community (T2C)

T2C - Laptops for students in need

Benefitted:

1,600

Malaysian families within the vicinity of their towers

Benefitted:

20

students of various vocational education in Myanmar received used laptops

Benefitted students

across six learning centres in Bangladesh, including multimedia classroom setups

edotco lent a helping hand in providing ICT and IT-related equipment to students in need with the goal of enabling students to obtain good education, in order to become leaders of tomorrow and progress the development of Malaysia.

Bangladesh: T2C - Water and Power programmes

Benefitted:

2,196

people across Habibpu, Nurnagar village

edotco Bangladesh provides safe drinking water to the distressed community in the coastal area where the drinking water is scarce due to salinity. edotco Bangladesh established a Reverse Osmosis Water Treatment Plant in partnership with Bangladesh Rehabilitation Assistance Committee (BRAC) in the area. A grant was issued to BRAC to execute their regular programme for water, sanitation and hygiene.

Benefitted:

2,800

people across 700 families

edotco Bangladesh also provided solar streetlamps for communities in 2021, impacting 2,800 people (700 families) from underprivileged communities from Ramu and Kutubdia streets with access to sustainable lighting.

Pakistan: T2C - Power programme



Benefitted:

64

people across 16 families

edotco provided lighting to communities in Ematagoda Housing Scheme, Agalawatta North and Meesalai South.

Sri Lanka: T2C - Power (lighting and security) programme

Benefitted:

1,600

people across 400 homes

edotco provided lights to communities in Dematagoda Housing Scheme, Agalawatta North and Meesalai South. With the existence of these street poles, community security is strengthened as part of edotco's support to connecting the unconnected and under-connected communities.

Upgrading of Multi-Purpose Lainchaur Ground



Ncell has completed the reconstruction of the iconic Lainchaur Ground at the heart of the city as a part of its Corporate Social Responsibility (CSR). The newly rebuilt multi-purpose ground features sport facilities, shared areas, resting sites, public restrooms and solar lights, among other facilities covering an area of 54,921 sq ft. The multipurpose ground will contribute to a healthier wellbeing and environment of the community. The ground is now open for the general public after its handover to the Kathmandu Metropolitan City (KMC). This benefits over 45,000 Lainchaur residents, and also indirectly benefits over 2 million people within the Kathmandu Valley.

Installation of Solar Lights at walkways and highways

- Ncell has installed 50 solar lights in Nakhhu area, benefitting daily commuters.



Community Development



OUR KEY INITIATIVES

Contributing to Healthcare for Communities

Ncell Telemedicine and Health Informatics Programme



- Ncell in collaboration with Dhulikhel Hospital (DH) has set up Telemedicine and Health Informatics centres to serve remote communities through quality health care services in four outreach centres under DH that benefit over 60,000 beneficiaries. Under this initiative, Ncell provided telemedicine equipment, established connectivity infrastructure at the local community health centres of DH and supported DH for procurement of local supplies and services needed for the execution of the project. DH, on the other hand, supported the allocation of and utilities, qualified Medical Doctors and Consultants on top of conducting periodic training sessions to ensure the project runs smoothly.

Maternity Centre in Hetauda

- In collaboration with Nepalese Army Wives Association (NAWA), Ncell has supported the construction of maternity centre in remote village of Makwanpur- 8, where easy access to a maternity centre was not available.

Ratmalana Audiology Centre (RAC)

Dialog's longest standing commitment to address the marginalised issues of hearing, sight, and speech impairments is embodied by the Ratmalana Audiology Centre (RAC). The centre is operated in partnership with the School for the Deaf in Ratmalana. It provides regular free testing and speech therapy for school students, as well as members of the public bearing letters from government ENT specialists. Since RAC's inception, Dialog has invested more than LKR 70 million rupees in it. As of 2021, the Ratmalana Audiology Centre has extended its services to over 100,000 clients over the past 12 years.



Services provided by Ratmalana Audiology Centre in 2021

For students and staff with disabilities in school

- Administered different tests and fitted hearing aids for necessary students. - 64 students
- Conducted speech therapy for students as well as school staff 97/112 students had utilised this therapy.

Free Community services

- Test newborn babies from both Kalubowila and Kethumathi Hospital (110 infants)
- Free tests and other services conducted at RAC for low-income communities

Services Provided at a cost

- Total Hearing tests
- Total Hearing aids and accessories Speech Therapy
- Special Education

Empowering Sri Lanka's Health Sector Through Dialog Axiata's Critical Care Infrastructure Enhancement Initiative

Dialog supported the Ministry of Health (MOH) to enhance the nation's critical health infrastructure through its latest project, the Critical Care Infrastructure Enhancement Initiative.

Dialog continues to assist a range of medical institutions through this initiative. The Anuradhapura Teaching Hospital will be equipped with state-of-the-art equipment of seven High Dependency Unit (HDU) beds. The Eheliyagoda Base Hospital, which currently does not have HDU facilities and treats over 150,000 patients in the OPD and 20,000 indoor patients a year, will also be equipped with an HDU facility. The Puttalam Base Hospital, serving a population of over 400,000 with only one Continuous Positive Airway Pressure (CPAP) machine (required for treating diseases and conditions affecting the respiratory system) will receive another life-saving CPAP machine under this commitment.

333 National Information Centre and Public Helpline

Through an existing partnership with the ICT Division in Bangladesh, Robi supports the 333 National Information Centre by sponsoring the platform from design to implementation. Within the last two years, there has been an increase in support from Robi through its AI capabilities enabled crowdsourced information. This allowed the services to be the main portal for access to pandemic-related health advisory, emergency food relief support and medicine and grocery delivery support, among others. The platform enabled more than 74 million calls, of which 6.87 million were telehealth calls. Robi's 333 programme obtained an Honourable Mention for the Best Innovation Public Service at Bangladesh Innovation Awards 2021.





Community Development



OUR KEY INITIATIVES

Employee Volunteerism

Celcom and Axiata -



Recipients received RM60 in Boost Wallet to get access for their needs at local stores within the community.

Bantuan Komuniti Prihatin

Foodpacks, hot meals as well as cash and devices assistance were provided, benefitting more than 3,500 lower income families, riders and frontliners.

Bantuan Siswa Prihatin -

Food Assistance (Food packs and Hot Meals) to B40 students at higher learning Institutions nationwide. This programme reached and benefitted more than 12,000 students.

edotco group continues to encourage employees to volunteer for our Corporate Social Responsibility (CSR) activities through our Employee Voluntary Engagement (EVE) programme. These range from festive related programmes to humanitarian relief, provision of necessities and infrastructure to underprivileged communities.



Provision of necessities to underprivileged communities

Through donation drives, providing basic back-to-school items and food, through edotco food bank, employees across edotco operating markets contribute to providing for livelihood for communities.

Humanitarian relief - In Malaysia, edotco employee volunteerism programmes supported communities for flood relief, supporting a total of 1,307 families throughout the year with essential food parcels.

Aid for communities with people with disabilities

In Malaysia, edotco employees contribute to supporting the blind with braille Al-Quran donations, and supporting facilities for people with disabilities such as wheelchair donations and enabling access to support for people with wheelchairs.

Employee volunteerism for tree planting

edotco Cambodia's "Let's plant 1 tree today" programme - 500 rare wood trees were planted in the community forest (Samaki Community) at Kampong Spue province. The community was actively participating in this tree planting along with edotco's employees and their family members.

Sentra Vaksinasi Indonesia Bangkit (SVIB)

XL Axiata Baik



- A programme carried out by XL Axiata to support the government in speeding up the acceleration of the implementation of the COVID-19 vaccination programme for the people of Indonesia.
- XL Axiata took a collaborative approach by leveraging on their respective competencies. Employees also volunteered and took turns to help the vaccination process.
- All processes for implementing the drive-thru vaccination programme were under the coordination of the Ministry of Health and other authorised institutions. All residents of Depok City were welcomed to receive their vaccinations.
- A programme which represents commitment and goodwill from the board of directors and employees of XL Axiata
- This activity was in collaboration with the Indonesian Red Cross (PMI) of the Province of DKI Jakarta.
- Collected blood from donors will be handed to the institution to be distributed to individuals suffering from COVID-19 in need of convalescent plasma assistance.



Emergency And Disaster Response



Disasters can disrupt communities, negatively impacting people, property, economies, and the environment. They often stretch a community's capacity to cope. As a digital business, we value the capacity we possess to reach wider communities. We serve as a crucial function in times of calamities and disasters through our digital services to enable widespread multimedia and digital messages through our platforms.

APPROACH

Information is crucial for effective disaster management. At Axiata, we are equipped with the right tools, infrastructure, and resources to assist with the stages of disaster management, i.e., risk reduction, preparedness, response, and recovery. With our OpCos, we strive to aid in information sharing, offering dependable connection especially to key services, with the aim to ensure society's overall safety and protection.

OUTLOOK

We aspire to improve and grow the scope of our digital services. Not only are we open to expanding our partnerships, but we will also continue to strengthen our relationships with our current partners which include disaster local network agencies, foundations, non-profit organisations, as well as the government.

OUR KEY INITIATIVES

Leveraging Digital Technology to Contribute to Natural Disaster Monitoring

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 our contribution to adapting to the region's climate adaptation capabilities, ensuring data, digitisation and modernisation can support our resilience to the threats of climate change.

Ncell and Department of Hydrology and Meteorology (DHM) collaboration on Early Warning System (EWS)



- Provided connectivity support to DHM, which has enabled the department to efficiently transfer data between hydrological/meteorological stations installed across the country and central server.
- Ncell upon DHM's request will continue to broadcast early warning alerts to the people living in flood-prone areas.
- As DHM installs new telemetry devices and expand hydro-meteorological stations, Ncell will continue to provide similar connectivity support to those stations, to enable more to access and benefit from this warning system initiative.

Dialog Disaster and Emergency Warning Network (DEWN)



Leveraging digital technology

DEWN is an early warning mechanism with the aim of minimising the risk and impact of disasters through an early-warning system.

Ensuring purposeful connectivity

Designed and developed through a partnership between Dialog, Microimage Mobile Media (Pvt.) Ltd. and the Dialog - University of Moratuwa Mobile Communication Research Laboratory, along with the Disaster Management Centre (DMC), DEWN uses the latest mobile communication technology to transmit alerts through a GSM network to issue customised alerts to the public and first responders, warning them of impending natural disasters.

Our contribution to community

The DEWN app offers a mobile cell-level alert facility, enabling media channels and other authenticated services to pull alerts of potential disasters for dissemination to the public.



Emergency And Disaster Response



OUR KEY INITIATIVES

Ensuring Purposeful Connectivity and Contributions during Natural Disasters

The sharing of official information and warnings as well as effective coordination of humanitarian relief are crucial to reducing the potential loss of life. Our efforts in this area are in line with our responsibility as a signatory of the GSMA Humanitarian Connectivity Charter.

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

Floods in South Kalimantan



- Ensured that services remained normal in most areas in three regencies hit by the flood in South Kalimantan.
- Maintained the quality of telecommunication and data networks in disaster-affected areas by ensuring adequate operations of infrastructure and network engineering.
- Provided emergency assistance required by the victims, such as food, medicines, and clean water, charging post and free Wi-Fi.

Seroja Hurricane in East Nusa Tenggara (NTT) and East Java Earthquake

- Provided free telephone and SMS services in areas affected by the two disasters.
- To this day, the technical team continues to restore the network that was affected by the disaster, especially in several areas in NTT.

Smart Food Support Programme



A fund relief programme Smart launched to help Cambodians with difficulties accessing food supplies amid the lockdown in Red Zones by engaging subscribers to donate money. Smart subscribers could donate from USD1 to USD10. A total of 300 vulnerable families in Banteay Meanchey received support from this programme.

Rally to Care



The Rally to Care initiative by the Dialog Foundation was launched to aid those affected by the tragic incidents of Sri Lanka Easter Bombings. The initiative continues its mission of long-term educational support for 500+ children and psychosocial rehabilitation for 250+ families, together with its partners World Vision Lanka, the Sarvodaya Shramadana Movement (Sarvodaya), My Doctor, Vision Care and the Ratmalana Audiology Centre.

A key part of Rally to Care was the scholarship programme created to support the long-term education of 353 children affected by the tragic Easter Sunday attacks. The initiative aims to help children through their education, ensuring that they have the access, resources and skills for finding employment.

In 2021, the Dialog Foundation ensured the quarterly disbursement of the Scholarships to 365 children in Katuwapitiya, Kochchikade and Batticaloa.

edotco Malaysia



- Sarawak flood Aid and COVID-19 relief - contribution of food and essential parcels. Contributed to a total of 150 families
- Kedah Flood and COVID-19 relief - contribution of food and essentials parcels. Contributed to a total of 150 families
- COVID-19 Relief - contribution of food and essentials parcels to a total of 1,000 families.
- COVID-19 Relief - edotco Malaysia and Immareet contributed 500 sets of PPEs to Klinik Kesihatan Gombak (Sep). A total of 500 employees volunteers were involved in Red Zones by engaging subscribers to donate money. Smart subscribers could donate from USD1 to USD10.

Early Warning Services



SMS broadcasts were sent to alert the public and raise the level of preparedness of communities for floods. This was done in collaboration with National Disaster Management Agency (NADMA). More than one million early warning SMSes were sent.

Flood Relief for Monsun Timur Laut (MTL) with Malaysian Relief Agency

Food assistance, cleaning assistance and mobile clinics were provided to communities affected by the Timur Laut monsoon. Seven affected states were aided with RM2 million allocated for emergency and recovery initiatives.

Flood Relief Mission with Malaysia Ministry of Communications and Multimedia

Cleaning and post-disaster assistance was provided by 100 Celcom employees of the Celcom Volunteer Squad.



Emergency And Disaster Response



OUR KEY INITIATIVES

Our Contribution to Community Resilience in the Face of the Pandemic

As societies continue to grapple with challenging pandemic impacts, it is encouraging how the global mobile industry has come together to accelerate digital adoption within our societies, and create inclusive solutions to support a swift socioeconomic recovery. Telcos anchored by strong ESG frameworks are better prepared to respond to struggles confronting communities and small businesses trying to get back on track. The SDGs are mission critical in guiding the industry forward with the right focus as we support revival and resilience through these unprecedented tough times.

Contributed RM5 million in medical equipment to Malaysian medical frontliners via the Greater Klang Valley Special Task Force under the Ministry of Health



- Provided > 21,000 SIMs, and 300 laptops and dongles to > 21,000 students from lower income families to attend school online
- Bantuan Komuniti Prihatin gave food packs, devices and cash to > 3,500 low income earners, delivery riders and frontliners
- Donated food packs for > 12,000 students at institutions of higher learning via Bantuan Siswa Prihatin
- Distributed > 250 devices to frontliners to provide them Internet connectivity
- Provided vaccination assistance at five national vaccination centres
- Contributed oxygen tanks and concentrators to > 5 hospitals nationwide
- Continued extending free daily 1GB Internet for people to access education, employment and other online platforms
- Ensured employees safety and containment of COVID-19 through measures such as staff vaccination programmes, strict adherence to COVID-19 SOPs at the workplace, and equipping our frontliners with COVID-19 safety kits



- Launched Smart Axiata Food Support Programme to raise funds and provide food donations to vulnerable families in remote areas
- Used network to send automated messages that supported national COVID-19 awareness campaigns
- Worked with Phnom Penh Municipality and Ministry of Post and Telecommunications to set up 21 vaccination centres capable of administering vaccinations to 4,200 people per day



- Held drive-through and walk-in vaccinations at XL's Indonesia Bangkit Vaccination Centre (SVIB) to simplify and speed up the vaccination process. The SVIB in Depok vaccinated more than 61,000 people, while the SVIB in Medan vaccinated more than 28,000 people
- AXIS Vaccination Programme held at universities, institutes and schools with more than 18,200 students vaccinated
- XL employees collaborated with Indonesian Red Cross to hold a convalescent plasma donation drive to help COVID-19 patients



- Provided 160 units of high flow oxygen concentrators to Ministry of Health and Population for distribution to different remote health institutions, health posts, isolation centres where it is not feasible to ensure supply of oxygen cylinders
- Collaborated with UNDP to manage COVID-19 vaccinations by providing free access to vaccination registration portal
- Supported the government in the dissemination of COVID-19 vaccination messages leveraging our infrastructure and network
- Collaborated with UNDP to manage COVID-19 vaccinations by providing free access to vaccination registration portal
- Launched Ncell COVID-19 Hotline Service with Dhulikhel Hospital providing 24/7 free health teleconsultation on COVID-19
- Continued giving free access to government hotlines 1133 and 1115



- Robi engaged in a collaboration project with the WHO (World Health Organization) and IEDCR (Institute of Epidemiology Disease Control & Research) as the telecommunications partner, with the project leveraging volunteer health professionals to collect COVID-19 data nationwide
- Established an emergency COVID-19 fund comprising employees' and Company's contribution, with food donation drives to COVID-19 affected/vulnerable rural communities
- Provided registered doctors of Directorate General of Health Services from across Bangladesh with 33GB data for free for a six-month period
- Extended Tk 8.5 mn emergency support to distributors and vendors during the pandemic
- Robi collaborated with NGOs Songjog and Footsteps to donate oxygen cylinders to the public



- Dialog with Manusath Derana' provided relief to hospitals and families in areas under lockdown
- Partnered with Bank of Ceylon and Wavenet International to establish the National 1390 COVID-19 Integrated Home-based Care Solution, a digital platform and outreach centre for COVID-19 patient homecare
- Donated a National Patient Bed Management Solution to the Ministry of Health to minimise admission time
- Enhanced urgently required critical care infrastructure in 18 hospitals



- Contribution of food and essentials parcels to a total of 1,000 families
- edotco Malaysia and Immaret contributed 500 sets of PPEs to Klinik Kesihatan Gombak. A total of 500 employees volunteers were involved in Red Zones by engaging subscribers to donate money
- edotco Bangladesh helped the COVID-19 affected community by providing cooked meals to around 3,500 children in Dhaka, Narayangonj, Rangpur, and Rajshahi District



Empowering Merchants With Smart Logistics Solutions

TheLorry is a Malaysia-based smart logistics platform supporting small merchants fulfil orders affordably at the touch of a button

AXIATA DIGITAL INNOVATION FUND



Governance

Governance

With our Group present in 11 countries across ASEAN and South Asia, we continuously focus on implementing policies, standards and systems that enshrine best practices throughout the value chain and across borders. We view the adoption of these best practices as central to the creation of sustainable, long-term value for all our stakeholders.

It is imperative that good corporate governance is ingrained from the highest levels of our organisation, with our Board of Directors playing a pivotal role in this regard. As the link between our shareholders and our diverse business units, they are responsible for establishing clear policies and procedures that drive discipline and accountability at all levels of the organisation. Guided by our Corporate Governance Framework, they ensure that the best interests of the Group, its shareholders and other stakeholders, are prioritised in the decision-making process at all times.

To ensure that we can appropriately and effectively manage resources, ensure compliance and manage our risks and opportunities, our Corporate Governance Framework executed by cross-functional management councils and Board-level committees, provide oversight on strengthened accountability throughout our business processes.



Business Ethics and Compliance

Key Highlights:

- Revised Axiata Code of Conduct and Axiata Supplier Code of Conduct
- Launched supporting policies (Anti-Bribery and Anti-Corruption Policy and Gift, Donations and Sponsorships Policy)



SNCR page 88.



Data Privacy and Cyber Security

Key Highlights:

- Executed Privacy Commitment across OpCos
- Conducted mandatory training and awareness on updated data privacy policies
- Completed year-1 execution of DT&R2023 Strategy



SNCR page 91.



Regulatory and Political Risk

Key Highlights:

- Strengthened regulatory and political risk management at Group and OpCos, with strengthened risk governance frameworks



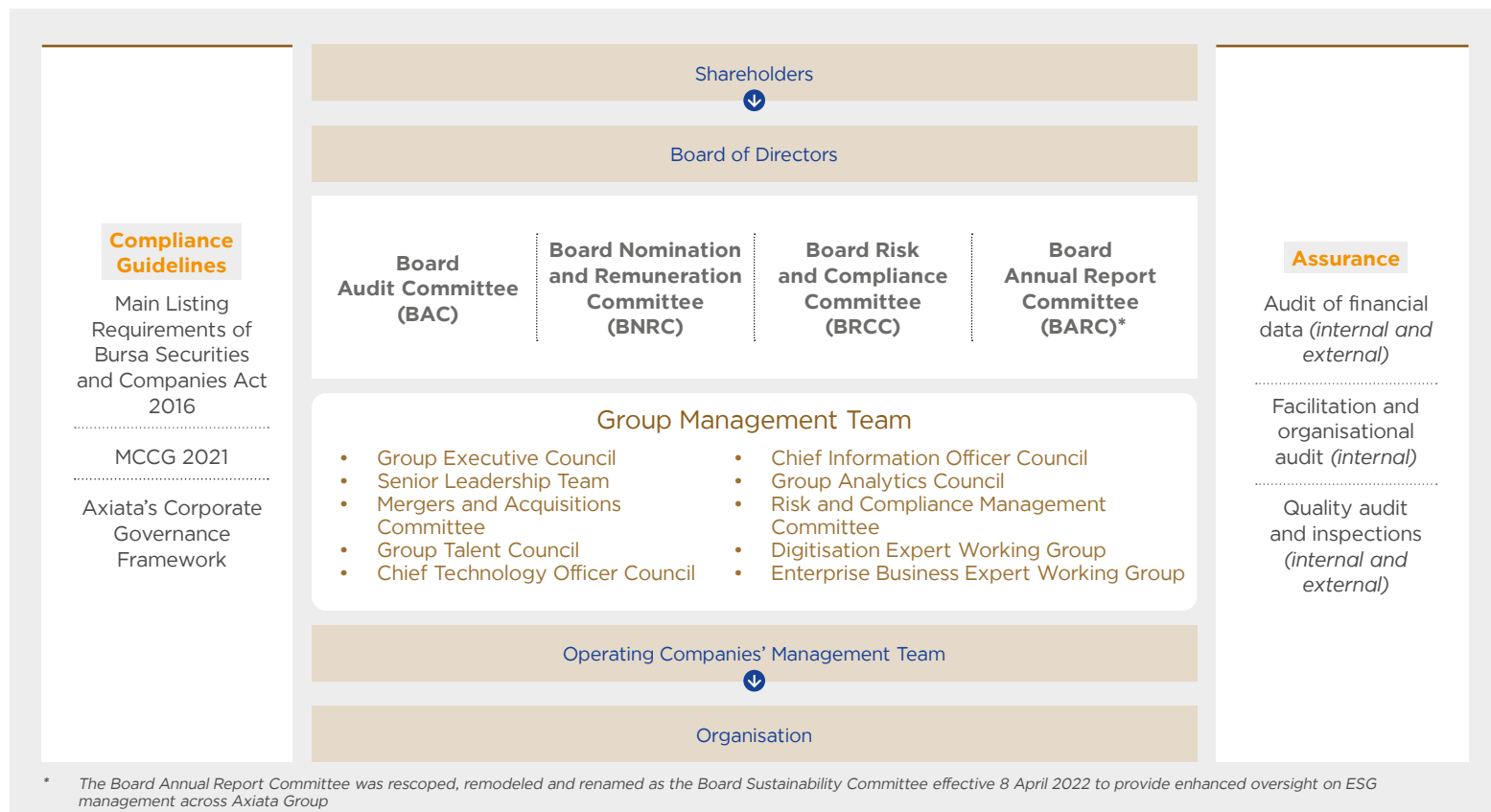
SNCR page 94.

Our Corporate Governance Framework

At Axiata, we continue to uphold the highest standards of corporate governance as part of our sustainable and long-term value proposition for all our stakeholders. Mirrored in the Group’s strengthened ambition towards sustainability and ESG management, the Board ensures that starting from the top, there is an oversight on how we are geared towards addressing these challenges for sustainable growth.

Through Axiata’s Corporate Governance Framework, we continuously enhance our approach to ensure its applicability to current developments and evolving regulatory requirements. In 2021, we made a conscious effort to embed sustainability into Axiata’s governance mechanisms, starting with the addition of sustainability on the President and Group CEO’s scorecard. This followed strengthened recommendations from the Malaysian Code on Corporate Governance (MCCG) in their updated amendments issued in 2021. The revised amendments recommended enhanced oversight, accountability and transparency of the Board on sustainability.

The integration of sustainability management across our organisation, supported by our Sustainability Governance Structure, depicts our synergistic approach to sustainability at the Management level. At the Board level, matters related to our ESG are discussed, which form part of the Board’s responsibilities and agenda items. For example, the Board Risk and Compliance Committee’s (BRCC) regularly scheduled updates on ESG risk ranking in the risk register is accompanied by management and Board oversight on data privacy and cyber security – an identified material matter within our Governance pillar.



Our recent efforts have focused on developing a structure across the Group where sustainability can be integrated meaningfully throughout and across every level.

Against this backdrop, we believe that our value proposition lies in leveraging individual and collective strengths from our diverse business streams among our group of companies, with the support of governance from a diverse management team and Board of Directors.

People

We leverage 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.

Process

We have adopted an iterative process of transparent reporting and disclosure, as well as rigorous risk and performance management, underlined by transparency and ethical and effective leadership

Excellence

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.



Business Ethics And Compliance



Ethics and compliance management form the core features of our operations. We ensure that the Group remains compliant with all applicable laws, regulatory requirements, and policies, across the countries we operate. From our home country, the Group’s established procedures are in line with the introduction of the MACC (Amendment) Act 2018 (S.17A) from June 2020. Embedded across our operations, we ensure we mirror the values of good business conduct in treating and working with our stakeholders.

APPROACH

Our policies, procedures and standards define a set of minimum requirements and practices that ensure the same level of professionalism, ethics and integrity are applied consistently with all stakeholders. With the highest oversight at the Board Risk and Compliance Committee (BRCC), driven through the Risk and Compliance divisions set up at Group and across OpCos, there is a Group-wide, concerted effort to ensure compliance is regulated. These manage:

Key business risks to safeguard shareholders’ investments and the Company’s assets

Cyber security risks and risks relating to data privacy

Risks arising from non-compliant practices and behaviours, particularly relating to ABAC and regulatory compliance matters

Through enhanced efforts in institutionalising policies across our Group during the year, we were able to enforce, revise or develop three key policies to strengthen business ethics and compliance for good business conduct. The following policies are applicable to all employees of the Axiata Group consisting of the Group, subsidiaries and all OpCos:

Axiata’s Code of Conduct, revised in 2021, records the Group’s commitment to conduct its business operations in a manner that is efficient, effective and fair. All stakeholders are mandated to avoid any activity that might constitute, lead to, or be perceived as, bribery and/or corruption and/or breach of any laws and regulations. The Code of Conduct includes provisions against anti-competitive conduct by suppliers, with our employees also required to comply with the relevant competition laws.

Axiata’s Anti-Bribery and Anti-Corruption (ABAC) Policy, revised in 2021, governs the Group’s internal and external stakeholders’ practices in conducting business for and on behalf of the Group. This is in line with our UI.EP values, enforcing a zero tolerance policy towards bribery and corruption. Group-wide, all MNO OpCos have revised the ABAC Policy to align with Group and published the ABAC Policy Statement and ABAC Policy on their corporate websites.

Axiata’s Gifts, Donations and Sponsorships (GDS) Policy, overseen by the Group Risk and Compliance Division, provides guidelines to all stakeholders on how to manage and respond to gift donation and sponsorship related matters. This includes the process of handling gifts, donations and sponsorships that can or may be perceived as improper, unethical or related to bribery and corruption. The Axiata Gifts, Donations and Sponsorships Policy prescribes the “No Gift” policy. The Gifts, Donations and Sponsorships Committee (GDSC) was established to ensure that any gifts, donations and sponsorships transactions are properly assessed and verified to ensure that any possible risks of bribery and corruption are mitigated.

Axiata Whistleblowing/Speaking Up Policy governs the whistleblowing process, establishing a mechanism to encourage everyone who has a relationship with the Group to voice and register their concerns, including any act that violates the code of conduct, actual or suspected misconduct, illegal or unethical behaviour, without fear of retaliation of unfair treatment.

OUTLOOK

While we have already heightened efforts in the year to standardise and ensure compliance to operating responsibly, with integrity and professionalism, we are cognisant that good business conduct is an ‘always-on’ imperative. A corruption risk register is being enhanced at Group and OpCos and will be completed within the year. We will continue to strengthen the execution of our business commitment to ethical standards and ensure appropriate mechanisms are well understood and solidified to manage, identify and control breaches.



Business Ethics And Compliance



OUR KEY INITIATIVES

Strengthening Awareness and Understanding with Axiata Corporate Compliance Programme

Axiata Group takes pride in its beliefs and core values of UI.EP and is committed to conducting business with zero tolerance of any forms of bribery and corruption. As part of the Corporate Compliance programme, the revised Code of Conduct together with the recently endorsed Axiata ABAC Policy (revised in 2021), were implemented across the Group with a series of accompanying procedures, standards and guidelines to ensure correct practice of the policies and commitment. Additionally, as part of the Corporate Compliance programme, we increased controls with the introduction of third-party due-diligence, the launch of the ABAC and GDS Procedures and the approval of the three-year ABAC Plan up to 2023.

Training

Mandatory trainings in 2021

- Anti-Bribery and Anti-Corruption
- Data Privacy
- Code of Conduct
- Enterprise Risk Management

Engagements

- Axiata Risk & Compliance Conference 2021 – 200+ participants
- Axiata Integrity Day 2021 (AxIM 2021) Theme: Serve with Integrity

Procedures and guidelines

- Anti-Bribery & Anti-Corruption Procedures
- Gifts, Donations & Sponsorships Procedures
- Anti-Money Laundering Guidelines
- Third-Party Due Diligence Guidelines and Checklist
- Corporate Social Responsibility SOP

Execution Plans

A three-year Axiata Anti-Bribery and Anti-Corruption Plan

were approved by the Group BOD in 2021

To date, our corporate compliance has successfully attained a Level 3 “established” rating in

21 of the 24 components

of the Compliance Maturity Framework, and “advanced” for one component

To maintain continuous engagement around ethics and compliance amongst our employees, we have been proactive in sharing information across our platforms for our employees. These include quarterly newsletters, awareness sessions tailored for Group business units and functions, circulars on policies and updates, including quizzes to ensure employees are clear on the do’s and don’t’s in carrying out their daily roles and responsibilities.

Leveraging on our digital champion ambition, we seek to incorporate digitisation into our processes where there is value in an automated, systems-driven approach to working. To operationalise the GDS Policy and Procedures, the introduction of the VITAL system automates the process of review, document traceability and reduces approval lead time to ensure transparency, accountability and offer valuable insights and analysis of the GDS transactions across Axiata.

Department-specific Additional Compliance Standards

Due to the nature of certain business operations, risks relating to bribery and corruption may be heightened without appropriate mitigation. As risks of bribery and corruption is known to exist in activities relating to branding, advertising and marketing, Axiata developed the Branding, Advertising and Marketing Policy (BAMS) in 2021. The BAMS Policy is a cross collaboration effort between the Group Brands and Marketing Division and the Group Risk & Compliance Division. A six-assessment criteria together with the VITAL principles methodology was established to ensure that proper risk assessment is carried out to mitigate any risks of bribery and corruption from occurring in any BAMS related activities.

Similarly, certain business activities that may pose higher risks of bribery and corruption were also given targeted ABAC trainings, these include Finance, HR, Procurement and Sales. The targeted trainings were conducted to reinforce the culture to “always do the right thing” and to ensure employees understand the risks upfront to be able to manage them better.



Business Ethics And Compliance



OUR KEY INITIATIVES



Human Rights Risks Management

Pursuant to Axiata's Supplier Code of Conduct, human rights risks cover matters relating to labour rights, working conditions and fair treatment of stakeholders.

We expect our vendors/suppliers to comply with the applicable labour laws and regulations and international labour rights and principles as established by the International Labour Organisation (ILO) in the 1998 Declaration on Fundamental Principles and Rights at work.

No forced labour	Child labour avoidance
Wages and benefits	Working hours
Respect and Dignity	Non-discrimination

Similar Supplier Codes of Conduct are adopted at our OpCos.

Stakeholder	Human Rights Risks
Customers	<ul style="list-style-type: none"> Artificial Intelligence and Big Data analytics Privacy and freedom of expression Online safety
Workforce	<ul style="list-style-type: none"> Freedom of association, collective bargaining Non-discrimination Fair remuneration Forced labour
Suppliers	<ul style="list-style-type: none"> Child labour Forced labour Conflict mineral standards
Community	<ul style="list-style-type: none"> Community impacts from building and maintaining infrastructure

Tax Transparency

Axiata recognises the importance of taxation and contributes direct and indirect taxes as well as fees to the economies, nation building and socio-economic development of all the countries where we operate.

Approach to Tax

Our approach to taxation is outlined in the Axiata Group Policies - Taxation Chapter which establishes the policies related to Axiata and the OpCos' tax affairs in order to properly address and comply with relevant tax laws, regulations and tax management. Supplementing the policy, thresholders for decision-making are guided by the Group's and OpCos' Limit of Authority.

We are committed to operate our businesses in compliance with the relevant tax law of the respective countries in which we operate in, act responsibly to society by paying the fair share of taxes as well as meet obligations to our shareholders.

Tax Governance, Control and Risk Management

At Axiata, the Group Chief Financial Officer (GCFO) shall be responsible for Group tax compliance matters. The Group Tax Department will monitor and coordinate on tax matters of Axiata and its OpCos. Similar to the Group, OpCo CFOs are responsible for ensuring compliance to tax law and obligations. All OpCos also have either a designated personnel or Taxation department to handle respective country's tax matters (referred to as OpCo Tax function).

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

Based on information received from OpCos, the Group Tax Department shall assess aggregate tax risk in order to determine and report on the overall tax position for Axiata Group and its OpCos.

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. The respective Opco Audit Committee of the Opco Board plays the similar role at the Opco level.

The Group reports its annual taxes and fees contributions by country and OpCo in our National Contribution Report. The Group also reports its taxes paid to the Government in our Group Audited Financial Statements. In 2021, Axiata contributed USD1.7 billion in direct and indirect taxes and fees to the governments of all countries where we operate.



For further disclosure on our tax contributions according to countries, refer to our latest National Contribution Report on page 95

Approach to Engagement with Tax Authorities

In all dealings with the tax authorities, Axiata and its OpCos shall maintain the highest standard of professional ethics. There shall never be any attempt to be inaccurate or evasive in dealing with tax authorities. Where tax legislation is not clear on matters concerning taxation impacting Axiata and its OpCos, appropriate tax advisory and consultation shall be sought.

Where the opportunity arises, we endeavour to participate in tax consultations that impact our business or industry to ensure that our views are considered and may in fact, shape the future.



Data Privacy And Cyber Security



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. In ensuring data privacy, uninterrupted services and reducing the risk of breaches, management of data privacy and cyber security as a material matter continues to play a significant role in today's digital society.



APPROACH

In view of the heightened risks of data breaches, we continue to strengthen and ensure due care and diligence when dealing with personal data. To ensure a unified approach to the security of information assets across the Group, our established governance pertaining to data privacy and cyber security is overseen by the Board Risk and Compliance Committee, supported by the Risk and Compliance Department. Our OpCos have also appointed a Data Privacy Officer (DPO) responsible for enhancing their respective data privacy capabilities.

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, ensuring our employees are equipped to manage these risks and that our vendors are well aware of how we prioritise these risks. Our employees, vendors, and business partners must comply with data privacy and cyber security compliance standards and adopt our Code of Conduct.

During the year in review, we undertook the following key activities to strengthen our approach towards data privacy and cyber security:

Employee Code of Conduct

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

Supplier Code of Conduct

Reviewed our Supplier Code of Conduct, to further enhance third-party data processing by our vendors. This included strengthening the Group's expectations on vendor obligations in processing stakeholders' data and information.

OUTLOOK

Now in Phase Two of our Privacy Programme, and completing the first year of execution of our cyber security Digital Trust & Resilience 2023 (DT&R 2023) programme, our improvements in cyber and privacy maturity ratings have reaffirmed our efforts in data privacy and cyber security. However, we will continue to execute, capacity-build and enhance awareness of this risk to our business, service reliability and safety for our customers.



Data Privacy And Cyber Security



OUR KEY INITIATIVES

Keeping Pace with Technical Capabilities and Risk Awareness and Management

We recognise that our DPOs play an important role in understanding privacy risks. To this end, almost all Privacy Champions have been trained as Certified Information Privacy Managers, and we ensure new Privacy Champions within the Group are also trained. Regular mandatory trainings, group-wide meetings and seminars ensure that the privacy maturity programme is maintained and advancements in data privacy technology and data breach techniques and procedures are continually enhanced.

Risks surrounding data, digitisation, connectivity and consumer privacy have heightened in the wake of COVID-19, as more users spent more time online. Fortunately, the focus on strengthened data privacy and security measures was maintained, with a significant shift in priority in how continuous, reliable and safe connectivity is ensured by operators. We remain ever vigilant on the cyber security and privacy risks we may face.

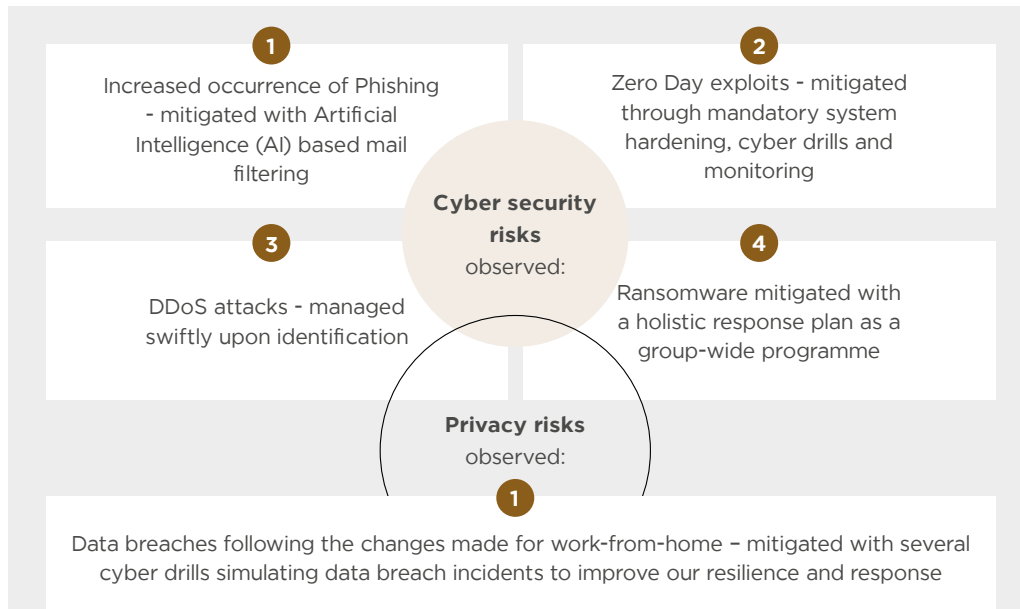
Privacy Commitment Strengthening Group-wide Awareness and Implementation

Axiata's Privacy Commitment, based on the principles of T.R.U.S.T (Transparent, Rights, Use, Security and Transfer) 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.

Supporting this commitment, accompanying policies and procedures (Group Data Privacy Policy and Privacy Notices) enable the responsible and governed execution of operations, tailored to ensure Data Privacy is ingrained into process of when programmes are deployed. Concurrently, we incorporate this same concept into Contracts and Agreements when engaging vendors to ensure a holistic supply-chain approach to our Privacy Commitment principles.

Across the Group, efforts are similarly mirrored at each OpCo for a consistent, holistic and concerted effort on the Privacy Programme's implementation to enhance data protection capabilities across our operations. Throughout the year, OpCos focused on a risk-based approach in identifying and managing localised risk, with actions and mitigation supported by Group strategy and Privacy Commitment programmes. Efforts also centred on Group-wide, proactive engagements to increase awareness of the importance of data privacy, risks of unmanaged data privacy and use-case scenarios for employees to navigate situations in which they may be privy to sensitive data during their work and dealings with vendors.

Privacy programme maturity across the group has also focused on implementing Data Subject Rights, Privacy by Design and implementing Privacy Enhancing Technologies through a collaborative approach across the OpCos.



Privacy Maturity Level at Group average of

2.67/5.00, an improvement of 91%

from last year

We engage external analysts and think tanks like GSMA, ITU, Gartner and the World Economic Forum for insights into emerging risks and industry risk trends towards adopting corrective actions and programmes to protect the Group.



Data Privacy And Cyber Security



OUR KEY INITIATIVES

Cyber Security Strategy Execution, with a Focus on Capability Development

In line with the increasingly digital society and rapid digitisation for work and play, with connections in almost all transactions of society presenting targets for nefarious activity, the threat landscape has grown significantly. Escalating attack numbers, social engineering exploits, supply chain vulnerabilities, and ransomware have raised the corporate risk level. Vigilance to cyber security is addressed by strengthening our technical and organisational aspects of our cyber security strategy.

Axiata's cyber security strategy, Digital Trust and Resilience 2023 (DT&R2023), is a coherent, defensible cyber security programme based on a clear vision and strategic goals to build customer trust and Axiata's cyber resilience. The Cyber Security Programme focuses on maintaining a strong foundation and implementing common standards and processes in DT&R2023. Axiata is focused on building our value creation function by ensuring we are right-sized, collaborative, future-fit, cost-conscious and making data-driven decisions to enable business agility.

Our DT&R 2023 Strategy in its first year of execution had focused on common converged capabilities and introduced a risk-based approach to protect and apply security controls to the infrastructure and processes.

We have leveraged advanced technology to elevate our cyber capabilities with machine learning and artificial intelligence (AI) tools for swift detection and response, more automation and data driven analytics in our activities to improve response time, reduce cost, as well as maintain consistency and repeatability of common activities. Synergy programmes, to promote collaboration, resulted in developing new technical standards for Cloud, Telco and Application Development. Baseline security controls were applied to critical IT assets, with 91% compliance.

Our Group Security Operations Centre (GSOC) has provided consistent monitoring and timely updates on internal and external threats. To measure our capability to respond to incidents, we have tracked the time taken to respond and contain an identified threat. Across the Group, we achieved a 73% improvement for 2021.

As the cybersecurity threat landscape continues to evolve, we remain committed to protecting against sophisticated attacks and threats globally through our people. Supporting awareness within the organisation for operational excellence, cyber drills are

conducted for increasing cyber resilience towards a cyber savvy culture. Training and awareness initiatives in 2021 were based on promoting awareness of policies and standards with current best practices to build an informed workforce. The coverage and completion of training modules for staff and vendors stood at more than a 90% completion rate.

In line with our digital champion ambition, we continuously undertake collaboration, knowledge sharing, crown jewel monitoring and protection as well as the adoption of new technologies into our processes. To ensure we can develop and maintain a mature security programme, we monitored our programmes while improving the controls based on the National Institute of Standards and Technology (NIST) framework.

In measuring our progress and effectiveness of programmes and initiatives, we monitor our maturity on the internationally recognised, independently assessed NIST Cyber Security Framework. The five areas of its assessment - Identify, Protect, Detect, Respond, Recover - provides an effective framework for Axiata's cybersecurity maturity programme. Axiata's 2021 aggregated NIST maturity index was 3.7 on a five-point scale and now exceeds the regional averages of companies across Asia Pacific, Europe and Latin America.

In the subsequent two years of the strategy, we seek to enhance our capacity, resources and skills to allow a scaling up of our cyber security coverage to ensure we are agile, self-reliant, and capable of addressing current and emerging risks.

Cyber Security Maturity average was

3.7/5.0, an improvement of 6% from last year

Ensuring customers' data safety and security in the digital ecosystem

We continued to strengthen our efforts in data privacy management and execution of Group-wide performance monitoring for our customers to high standards. We also ensured that we are able to mitigate cyber threats to ensure customer safety while connected. In tandem with safeguarding our infrastructure and systems, we also recognise our responsibility to create awareness on data safety and security. Hence, we are transparent to our customers about our policies and practices, publishing awareness information on the websites of our digital telcos to build our customers' awareness of cyber threats (phishing, financial and commercial scams, fake online shopping scams, and social engineering scams on their mobile services).

DT&R 2023

Our Vision:

To inspire trust and confidence in Axiata as The Next Generation Digital Champion

Our Mandate:

To secure information assets against cyber threats across the Group, in line with Axiata 5.0 Strategy



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 continue to take appropriate steps to improve our response to these 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 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, including service taxes, excise duties and Value Added Tax (VAT).

These regulations create uncertainties in our operations and may impair business returns and long-term growth prospects, limit our flexibility to respond to market conditions, competition and new technologies. Through a regulatory compliance framework, under Group Regulatory, there is a structured approach in monitoring regulatory compliance applied.

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 improved 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 that may arise, leveraging their local expertise, local familiarity and relations, to assess changing scenarios continually. In ensuring business resilience amidst any instability, all OpCos are equipped with a comprehensive Business Continuity Plan (BCP) that shall be activated when a crisis is triggered.

To manage and maintain good relationships with a broader group of 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 our markets, we also contribute to each country's wellbeing through various CSR programmes that contribute to socio-economic development.

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.

Capacity-building Regulatory Teams Towards Protecting Integrity of the Telco Sector

Our industry is fast evolving in nature, and while this creates value through innovation in product service and delivery, we are also governed by practices to ensure our operations can be delivered responsibly in balance with national agendas and industry ambition.

To ensure readiness and awareness of the shifting regulatory landscape, Group Regulatory and OpCo Regulatory Teams participate in regular workshops and trainings to align with best practices and standards in navigating regulatory challenges and opportunities effectively. Throughout 2021, a series of engagements were held for Regulatory divisions, as well as collaborations between OpCos for specific topics, towards upskilling and refreshing common telco regulatory areas:

- Spectrum management (evolution and outlook)
- 5G policy & 5G trials best practice
- Access and pricing regulation
- Competition law and anti-competitive behaviour
- Licensing and authorisation best practices
- Number Portability
- Financial Inclusion initiatives
- TowerCo developments

Nurturing Pioneers Championing Data Driven Technology

Malaysia-based Aerodyne Group is a leading global DT3 (Drone Tech, Data Tech, and Digital Transformation) enterprise solutions provider and pioneer in using artificial intelligence in drone data technology

AXIATA DIGITAL INNOVATION FUND



National Contribution Report

National Contribution Report

National Contributions across the Group

As a leading regional telecommunications Group with a presence in 11 countries and a customer base of approximately 163 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 employers, significant taxpayers, and substantial purchasers of local services where it has a digital telecommunications presence.

Over the past eight 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 enhanced our level of disclosure of the contributions we have provided to the countries in which we operate.

The 2021 National Contribution Report (NCR2021) 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.

Long-Term Good Corporate Citizen

Our national contributions represent 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. The National Contribution Report consists of economic impact assessments for seven OpCos across the 11 countries we operate¹.



USD11.1 billion
Total GDP contribution



13,181
total direct employees



Total capital and operating investment of
USD5.0 billion



Approximately
700,000 jobs supported in the region



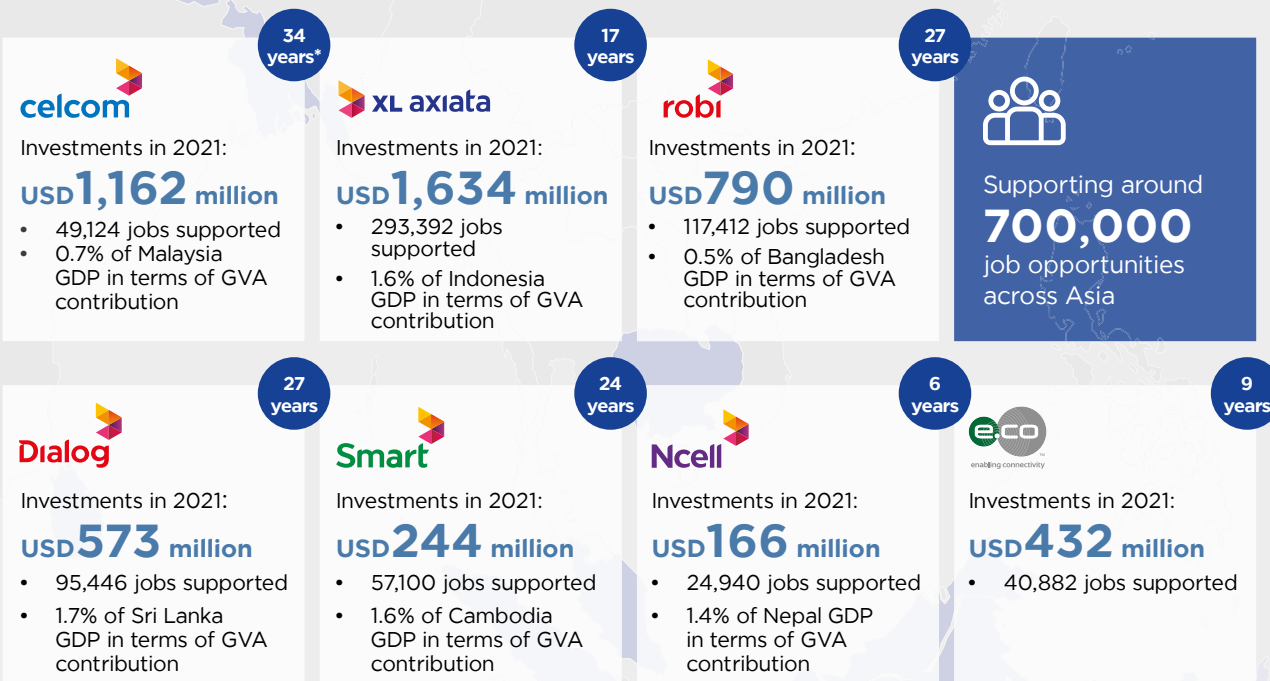
Total taxes and fees paid
USD1.7 billion

Note:

¹ The seven OpCos and 11 countries included are 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

Axiata Has Been A Long-Term Investor and a Major Economic Contributor in ASEAN and South Asia

ACHIEVEMENTS ACROSS THE GROUP IN 2021



Notes: Investment in the forms of capital expenditure and operating expenditure

Ncell's financial year ends on 15 July 2021, which is different from other OpCos (31 December 2021)

* Celcom: Incorporated in 1988 under TMI, then sold to Axiata during TMI demerger in 2008

Source: External consultant analysis

National Contribution Report

Malaysia

Cambodia

Indonesia

Sri Lanka

Bangladesh

Nepal

edotco

MALAYSIA

Celcom is Malaysia's first private mobile operator, with over 9.6 million customers. Established in 1988, its 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

USD2,568 million (0.7% of the Nation's GDP)

Operational Direct GVA: **USD861 million**
Operational Indirect and Induced GVA: **USD821 million**

Capital Investment GVA: **USD201 million**
Productivity GVA: **USD685 million**

- Celcom's total Gross Value Added (GVA) contribution to the Malaysian economy reached USD2,568 million, accounting for 0.7% of the national GDP in 2021.
- Celcom's operations directly and indirectly contributed USD1,682 million, accounting for 66% of total contribution.
- A further USD201 million GVA was generated by Celcom's capital investment, accounting for 8% of total contribution.
- Contribution from productivity improvement was USD685, accounting for 27% of the total contribution.



Direct Employees

2,388

Female **46.6%**
Malaysian **99.6%**

- 2,388 staff were directly employed by Celcom in 2021.
- Around 46.6% of total employees were women, higher than the national level recorded at 39%.
- Malaysian citizens accounted for 99.6% of total employees.



Total Jobs Supported

49,124

Directly Employed: **2,388**
Operational indirectly supported: **36,007**
Supported by Capital Investment: **10,729**

- Overall, Celcom supported 49,000 jobs in 2021 through its operations and capital investments.
- Celcom's operations directly and indirectly supported 36,000 jobs, accounting for 73% of total employment contribution.
- A further 10,700 jobs were supported by Celcom's capital investments.



Capital + Operational Expenditure

USD1,162 million

Operational Expenditure: **USD913 million**
Capital Expenditure: **USD249 million**

Every **USD1** spent on capex translates to: **USD10.3 GVA Contribution**¹

Celcom's total Capital and Operational Expenditure reached USD1,162 million in 2021, with Capital Expenditure recorded at USD249 million (21%) and Operational Expenditure at USD913 million (79%).

For every USD1 Celcom spent in Malaysia through its capital investment, it added USD10.3 GVA to the Malaysian economy in 2021.



Contribution to Public Finance

USD186 million

(0.3% of total tax revenue of Government of Malaysia)

Celcom contributed USD186 million in total taxes and fees paid, accounting for 0.3% of total tax revenue of Government of Malaysia².

Notes:

¹ Including GDP contribution from market penetration related productivity impact

² Total tax revenue of Government of Malaysia in 2021 was estimated at RM221,023 million. (Source: Ministry of Finance, Malaysia)

National Contribution Report

Malaysia	Cambodia	Indonesia	Sri Lanka	Bangladesh	Nepal	edotco
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Economic and Financial Contribution to the Nation

Celcom's Total Economic Contribution to the Malaysian Economy

Celcom's substantial operations and investments in Malaysia continued to contribute USD2.6 billion to Malaysia's GDP in 2021. With a total operating expenditure of USD913 million and capital investment of USD249 million, Celcom's total Gross Value Added (GVA) contribution to Malaysia's economy was estimated at USD2,568 million in 2021, accounting for 0.7% of national GDP.

Celcom's operations directly contributed USD861 million, accounting for 34% of total GVA contribution. It also indirectly contributed USD821 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, higher than the general industry average of USD0.81.

USD201 million GVA was generated by Celcom's capital investment, accounting for 8% of total contribution. Productivity improvement contributed a further USD685 million. (Figure 1)

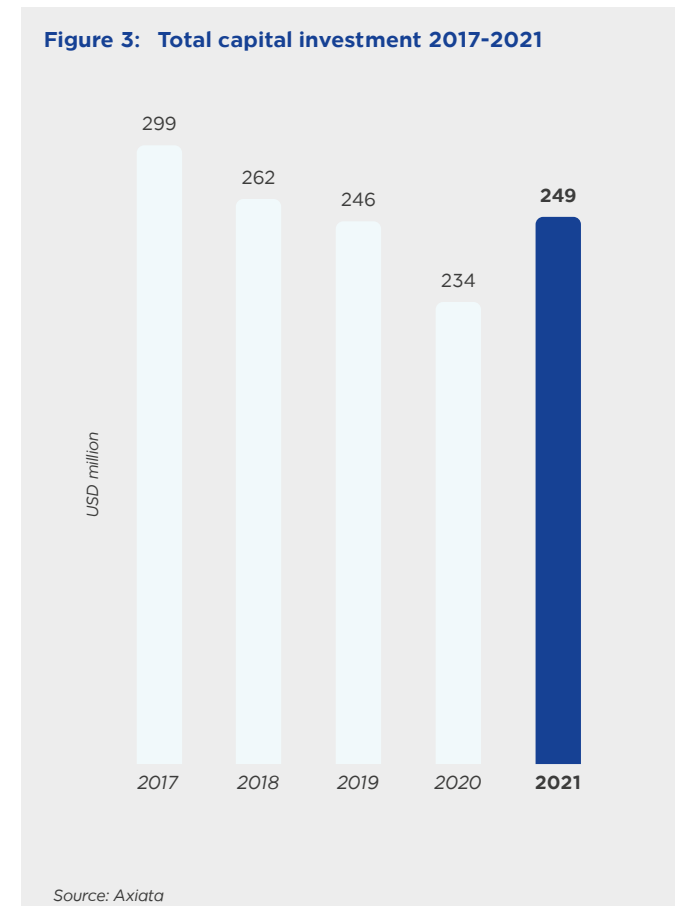
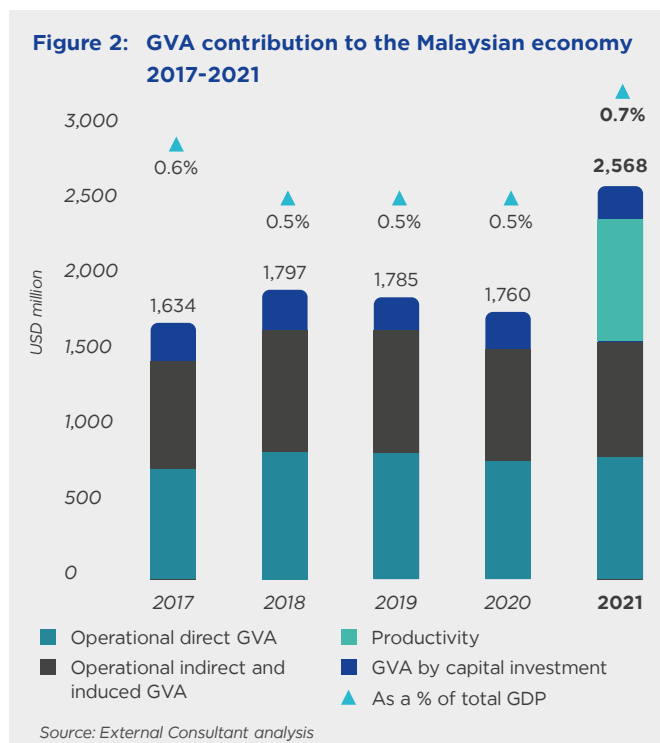
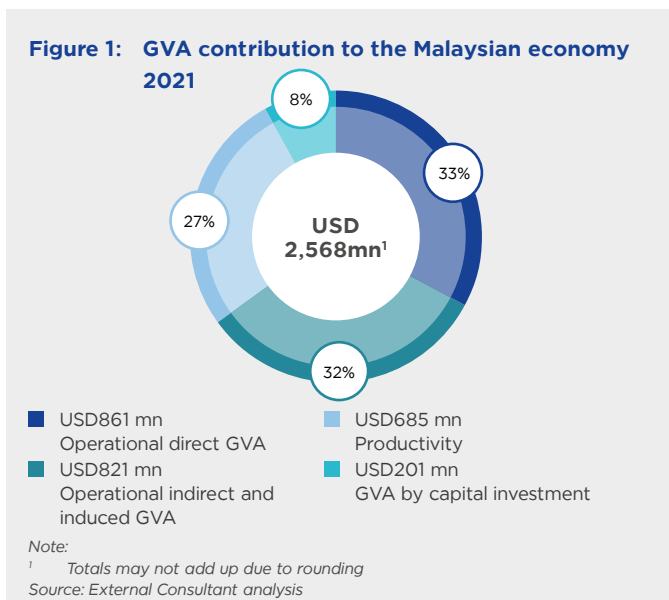
Celcom's Total Economic Contribution over the Last Five Years

Celcom's total GVA contribution rose from USD1,634 million in 2017 to USD2,568 million in 2021 with an increased share of the country's GDP from 0.6% to 0.7%. This was mainly due to a post-COVID-19 increase in mobile penetration rate in Malaysia in 2021, compared to other years where it was static or declining.

Over the last five years, total operating profits increased by a CAGR of 6%. Meanwhile, the market share of Celcom's penetration dipped slightly from 24% to 23%. However, total GVA contribution grew by 46% in 2021 from 2020 mainly due to the productivity improvement resulting from increased mobile subscribers as described above. (Figure 2)

Investing and Innovation for the Long Term

Total accumulated capital investment by Celcom over the last five years reached USD1,290 million. In 2021, Celcom continued to make significant investments of USD249 million. This continuous investment supports Celcom's long-term development, and ongoing significant contribution to the Malaysian economy. (Figure 3)



National Contribution Report

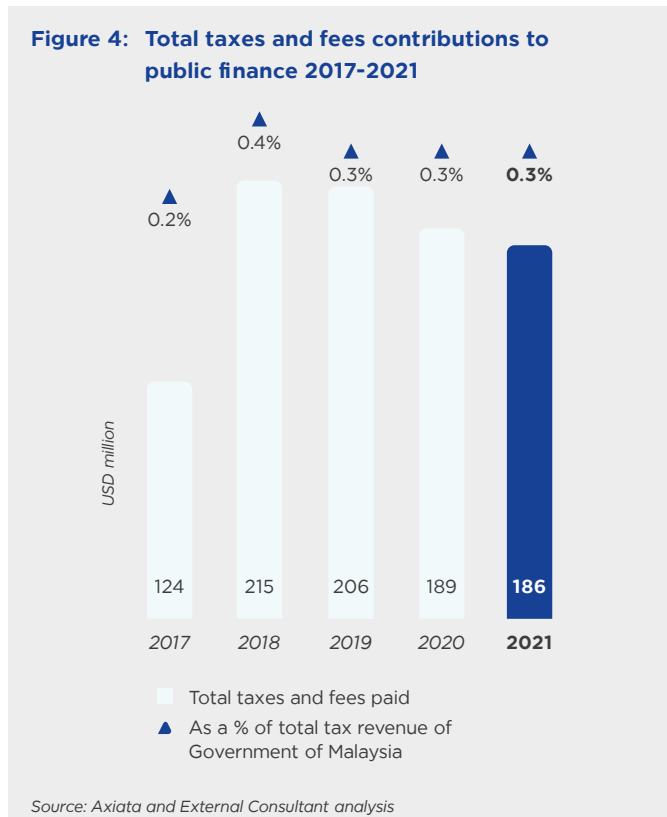
Malaysia	Cambodia	Indonesia	Sri Lanka	Bangladesh	Nepal	edotco
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Economic and Financial Contribution to the Nation

Contributions to Public Finance

Total accumulated taxes and fees contributions to public finance over the last five years reached USD920 million. Annual taxes and fees contributions increased from 2017 to 2018 but have since declined slightly. This is mainly due to a sharp increase in Celcom's operating profits in 2018.

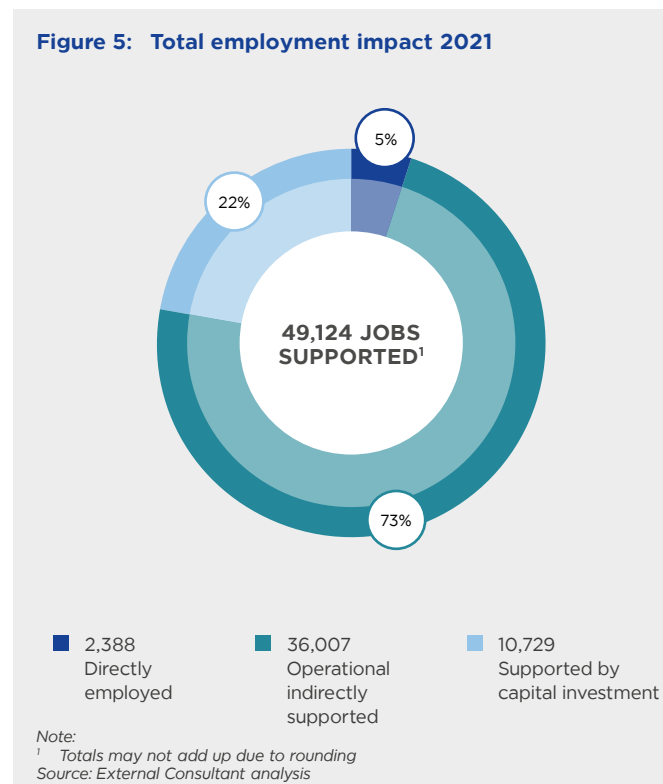
In 2021, Celcom contributed USD186 million in total taxes and fees paid, accounting for 0.3% of total tax revenue of Government of Malaysia. (Figure 4)



Total Employment Impact

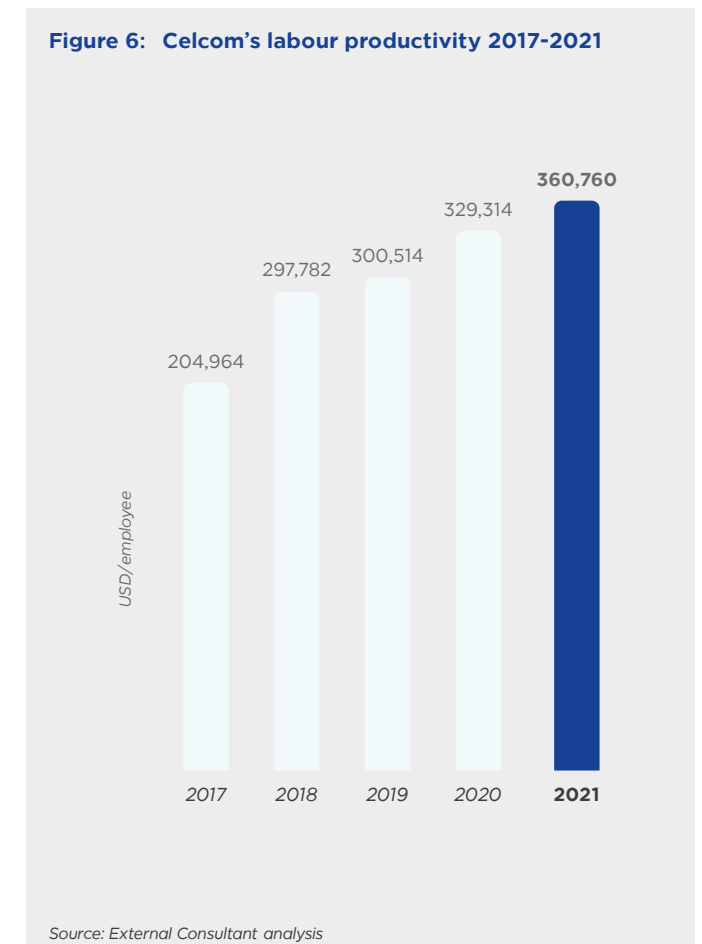
Celcom directly provided 2,388 jobs in 2021. The firm was predominantly run by Malaysian citizens with 99.6% of total employees being Malaysian. Around 46.6% of Celcom employees were female, higher than the national level recorded at 39%.

Celcom's operations indirectly supported an additional 36,007 jobs in Malaysia through its suppliers and a further 10,729 jobs were supported by Celcom's capital investments. The total number of employees supported increased from 46,921 in 2020 to 49,124 in 2021. (Figure 5)



Celcom's Labour Productivity over the Last Five Years

Celcom's productivity, measured as Gross Value Added (GVA) per employee, reached USD360,760 in 2021, representing a CAGR of 15.2% from USD204,964 million in 2017. Celcom's productivity increased by 9.5% in 2021. (Figure 6)



National Contribution Report

Malaysia

Cambodia

Indonesia

Sri Lanka

Bangladesh

Nepal

edotco

CAMBODIA

Smart is Cambodia's leading mobile telecommunications operator, serving more than seven 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 LTE Advanced Pro 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

USD416 million (1.6% of the Nation's GDP)

Operational Direct GVA: **USD187 million**

Operational Indirect and Induced GVA: **USD93 million**

Capital Investment GVA: **USD63 million**

Productivity GVA: **USD72 million**

- Smart's total Gross Value Added (GVA) contribution to Cambodian economy reached USD416 million accounting for 1.6% of total national GDP¹ in 2021.
- Smart's operations directly and indirectly contributed USD280 million, accounting for 67% of total contribution.
- A further USD63 million GVA was generated by Smart's capital investment, accounting for 15% of total contribution.
- GVA contribution due to the productivity increase was USD72 million, accounting for 17% of the total GVA contribution.



Direct Employees

785

Female **37%** Cambodian **96%**

- Approximately 785 staff were directly employed by Smart in 2021.
- Around 37% of total employees were women.
- Cambodian citizens accounted for 96% of total employees.



Total Jobs Supported

57,100

Operational indirectly supported:

33,350

Directly Employed: **785** Supported by Capital Investment:

22,965

- Overall, Smart supported 57,100 jobs in 2021 through its operations and capital investments.
- Smart's operations directly and indirectly supported 34,135 jobs.
- A further 22,965 jobs were supported by Smart's capital investments.



Capital + Operational Expenditure

USD244 million

Operational Expenditure: **USD163 million**

Capital Expenditure: **USD81 million**

Smart's total Capital and Operational Expenditure reached USD244 million in 2021 with Capital Expenditure recorded at USD81 million (33%) and Operational Expenditure at USD164 million (67%).

Every **USD1** spent on capex

translates to:

USD5.2 GVA Contribution

For every USD1 Smart spent in Cambodia through its capital investment, it added USD5.2 GVA to the Cambodian economy in 2021.



Contribution to Public Finance

USD103 million

(2.0% of total tax revenue of Government of Cambodia excluding regulatory related fees, levies and payments)

Smart contributed USD103 million in total taxes and fees paid, accounting for 2.0% of total tax revenue of Government of Cambodia, excluding regulatory related fees, levies and payments².

Notes:

¹ 2021 GDP estimated as USD26,526 million based on 2% growth (Source: ADB website, accessed March 2022)

² Total government tax revenue in 2021 was estimated at USD3,061 million. (Source: As reported by Khmer Times and Phnom Penh Post)

National Contribution Report

Malaysia	Cambodia	Indonesia	Sri Lanka	Bangladesh	Nepal	edotco
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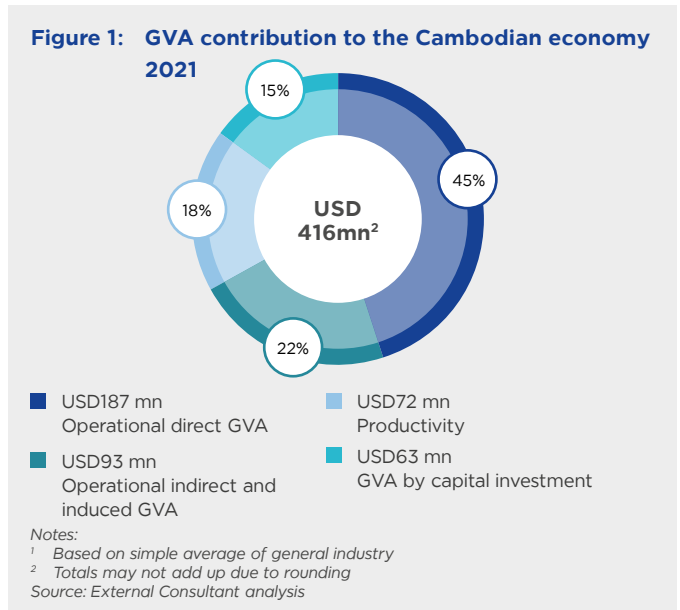
Economic and Financial Contribution to the Nation

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 2021. With a total operating expenditure of USD163 million and capital investment of USD81 million, Smart's total Gross Value Added (GVA) contribution to Cambodia's economy was estimated at USD416 million in 2021, accounting for 1.6% of national GDP.

Smart's operations directly contributed USD187 million, accounting for 45% of total GVA contribution. It also indirectly contributed USD93 million to economic activity. For every USD1 Smart contributed directly to Cambodia's economy, another USD0.5 was generated indirectly through local suppliers, higher than the general industry average of USD0.4¹.

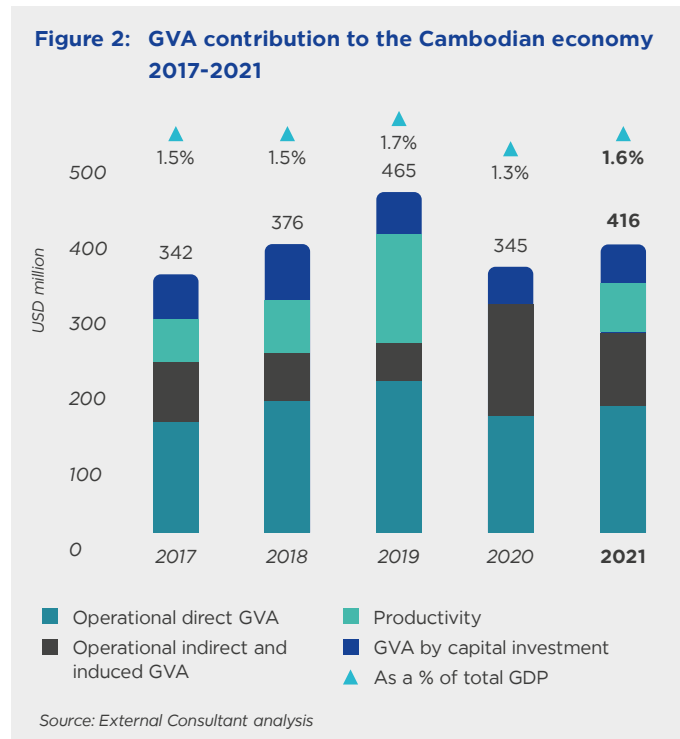
Capital investment contributed USD63 million, representing 15% of total GVA. A further USD72 million which was generated from productivity improvement due to the rising mobile penetration rate, accounted for 17% of total GVA. (Figure 1)



Smart's Total Economic Contribution over the Last Five Years

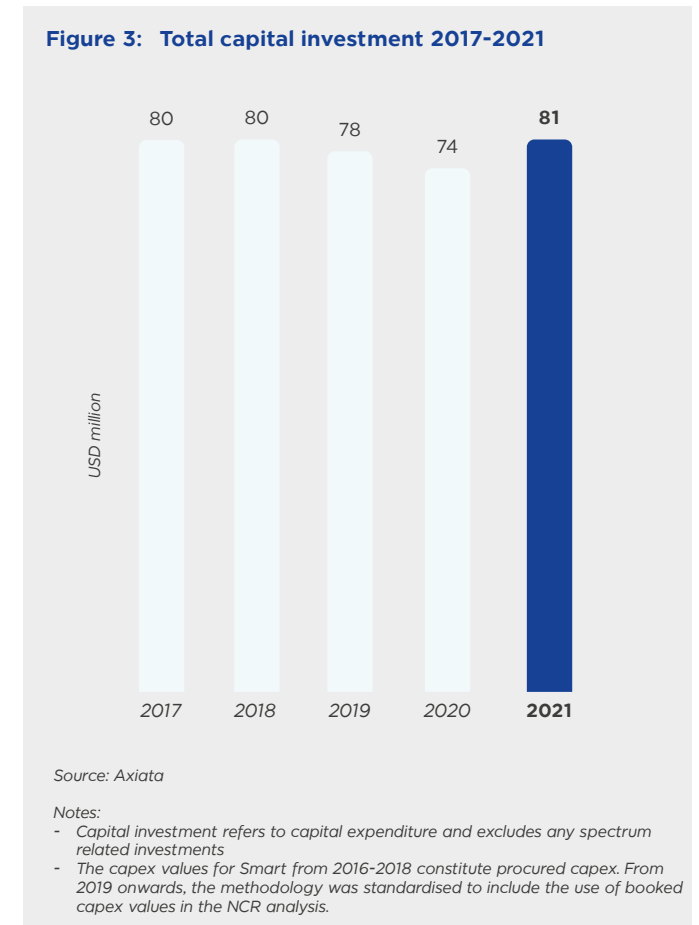
Smart's total GVA contribution increased from USD342 million in 2017 to USD416 million in 2021 with a CAGR of 5.0%, representing a slightly increasing share of the country's GDP to 1.6%. Expansion in Smart's operational profits and mobile penetration rate in Cambodia facilitated the growth of GVA contribution.

Over the last five years, total operational profits grew from USD137 million to USD187 million with a CAGR of 8.1%. With total number of mobile subscribers in Cambodia increasing from 20.8 million in 2020 to 22.3 million in 2021, mobile penetration rate in Cambodia increased from 125% to 132%. (Figure 2)



Investing and Innovation for the Long Term

Total accumulated capital investment by Smart over the last five years reached USD393 million. In 2021, capital investment grew by 9% from USD74 million to USD81 million. Continuing capital investment supports Smart's development in Cambodia and makes a significant contribution to the Cambodian economy. (Figure 3)



National Contribution Report

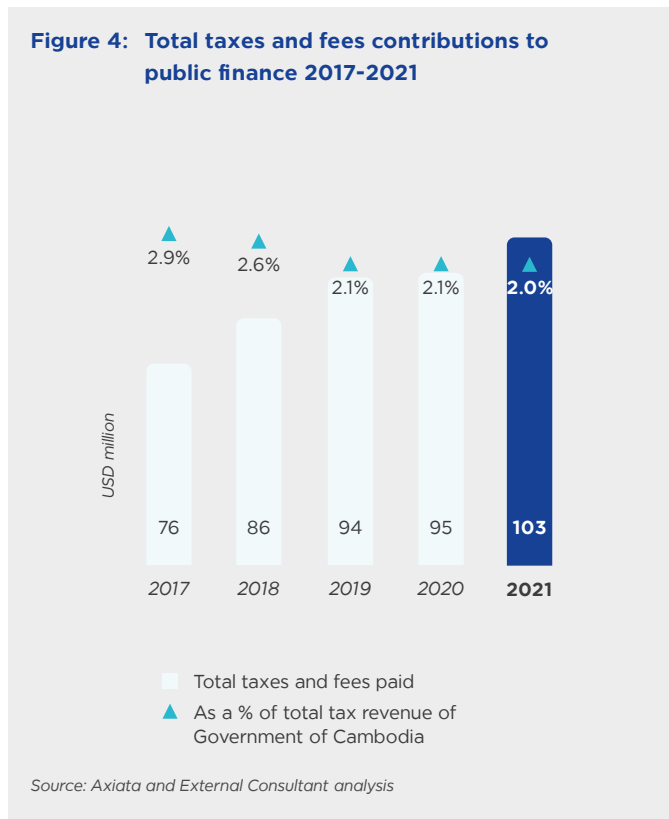
Malaysia	Cambodia	Indonesia	Sri Lanka	Bangladesh	Nepal	edotco
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Economic and Financial Contribution to the Nation

Contributions to Public Finance

Total accumulated taxes and fees contributions to public finance over the last five years reached USD454 million. Annual taxes and fees contributions has expanded from USD76 million in 2017 to USD103 million in 2021 with a CAGR of 8%.

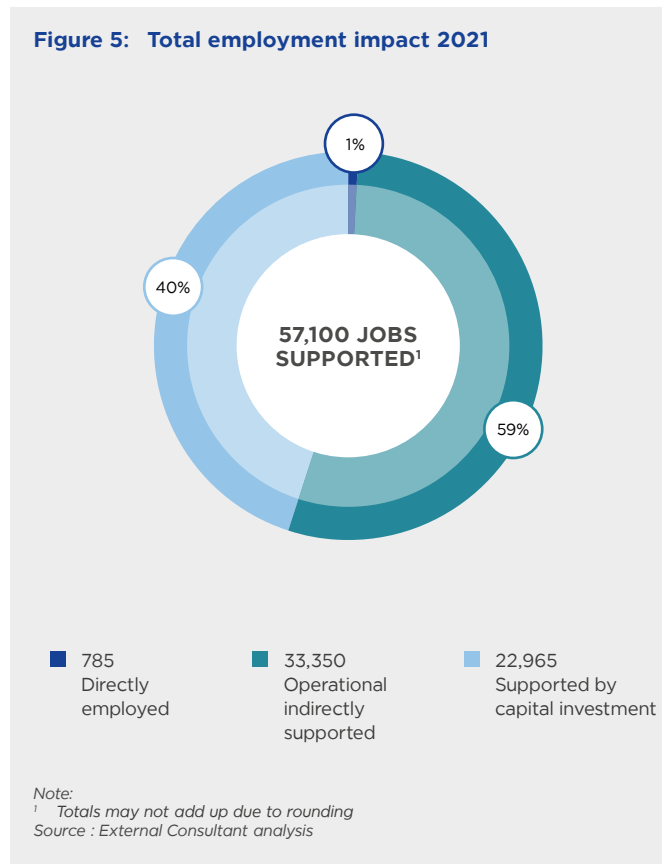
In 2021, Smart contributed USD103 million in total taxes and fees paid, accounting for 2.0% of total tax revenue of Government of Cambodia, excluding regulatory related fees, levies and payments. (Figure 4)



Total Employment Impact

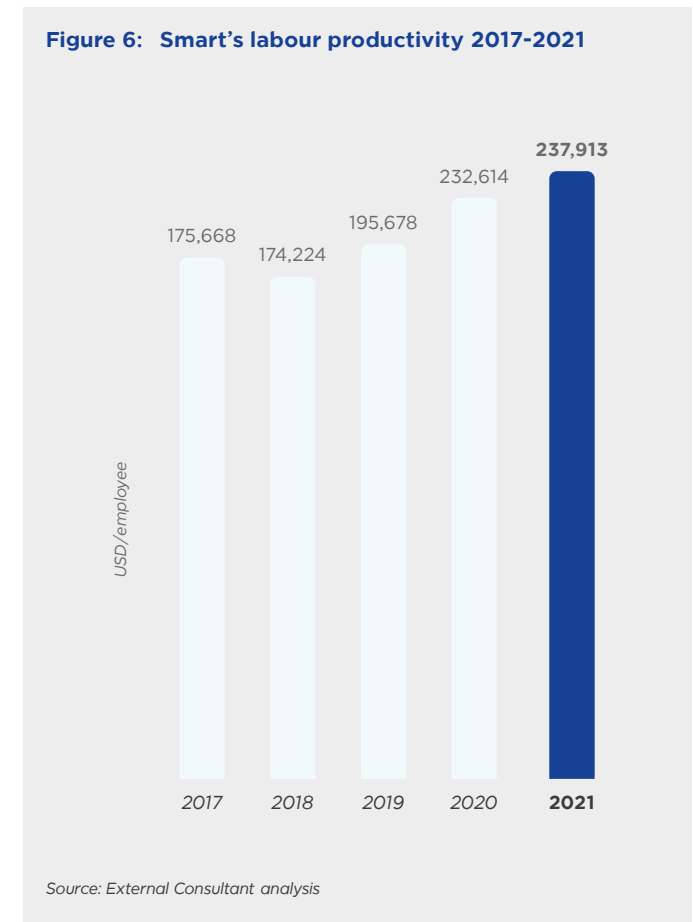
Smart directly provided 785 jobs in 2021. Cambodian citizens accounted for 96% of total employees of the firm. Around 37% of Smart employees were women.

Smart's operations indirectly supported an additional 33,350 jobs and a further 22,965 jobs were supported by Smart's capital investments. (Figure 5)



Smart's Labour Productivity over the Last Five Years

Smart's labour productivity measured as Gross Value Added (GVA) per employee, increased from USD175,668 in 2017 to 237,913 in 2021 with a CAGR of 7.9%. Significant growth in operational profits supports the expanding of productivity. (Figure 6)



National Contribution Report

Malaysia

Cambodia

Indonesia

Sri Lanka

Bangladesh

Nepal

edotco

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

USD3,925 million (0.4% of the Nation's GDP)

Operational Direct GVA:
USD1,004 million

Operational Indirect
and Induced GVA:
USD919 million

Capital Investment GVA:
USD626 million

Productivity GVA:
USD1,376 million

- XL's total Gross Value Added (GVA) contribution to the Indonesian economy reached USD3,925 million, accounting for 0.4% of the total national GDP in 2021.
- XL's operations directly and indirectly contributed USD1,923 million, accounting for 49% of total GVA contribution.
- A further USD626 million was contributed by XL's capital investment, accounting for 16% of total GVA contribution.
- Contribution from productivity improvement was USD1,376 million, accounting for 35% of the total GVA contribution.



Direct Employees

1,575

Female
30%

Indonesian
99%

- Approximately 1,575 staff were directly employed by XL in 2021.
- Around 30% of total employees were women.
- Indonesian citizens accounted for 99% of total employees.



Total Jobs Supported

293,392

Directly Employed:

1,575

Operational indirectly supported:

107,708

Supported by Capital Investment:

184,109

- Overall, XL supported 293,392 jobs in 2021 through its operations and capital investments.
- XL's operations directly supported 1,575 jobs and indirectly supported over 107,700 jobs.
- Capital investment generated over 184,100.



Capital + Operational Expenditure

USD1,634 million

Operational Expenditure:
USD941 million

Capital Expenditure:
USD693 million

Every **USD1**
spent on capex
translates to:
USD5.7 GVA
Contribution¹

XL's total Capital and Operational Expenditure reached USD1,634 million in 2021, with Capital Expenditure recorded at USD693 million (41%) and Operational Expenditure at USD941 million (58%).

For every USD1 XL spent in Indonesia through its capital investment, it added USD5.7 GVA to the economy of Indonesia in 2021.



Contribution to Public Finance

USD475 million

(0.3% of total tax revenue of Government of Indonesia)

XL contributed USD475 million in total taxes and fees paid, accounting for 0.3% of total tax revenue of Government of Indonesia².

Notes:

¹ Including GDP contribution from market penetration related productivity impact

² Total government tax revenue was Rp2,003 trillion (USD140 billion). (Source: Statistics Indonesia, Actual government revenue)

National Contribution Report

Malaysia	Cambodia	Indonesia	Sri Lanka	Bangladesh	Nepal	edotco
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Economic and Financial Contribution to the Nation

XL's Total Economic Contribution to the Indonesian Economy

Led by XL's total operating expenditure of USD941 million and capital investment of USD693 million, the company's total Gross Value Added (GVA) contribution to Indonesia's economy was USD3,925 million, accounting for 0.4% of national GDP.

XL's operations directly contributed USD1,004 million, accounting for 26% of total GVA contribution. Another USD919 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, higher than a general industry of USD0.6¹.

A further USD626 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 USD1,376 million, accounting for 35% of total GVA contribution. (Figure 1)

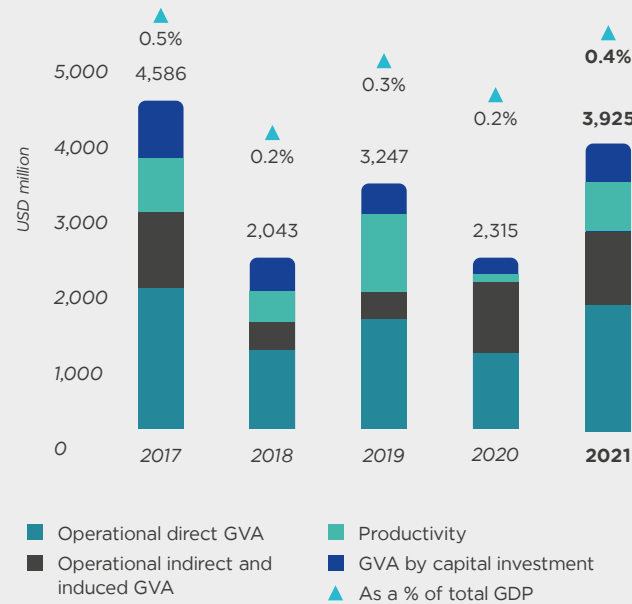
XL's Total Economic Contribution over the Last Five Years

XL's total GVA contribution decreased from USD4,586 million in 2017 to USD3,925 million in 2021. However, the contribution increased from USD2,315 million in 2020 mainly due to an increase in mobile subscriptions. The GVA contribution from productivity improvement was USD1,376 million. (Figure 2)

Investing and Innovation for the Long Term

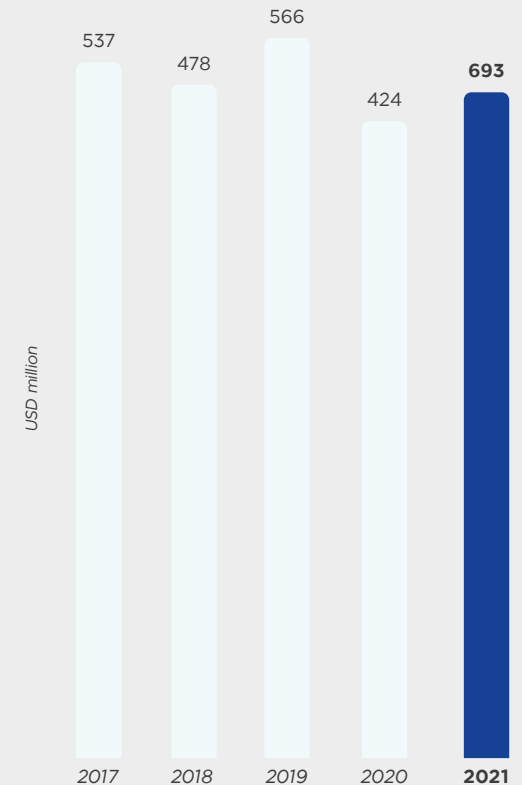
Total accumulated capital investment by XL over the last five years reached USD2,698 million. In 2021, capital investment increased by 63% from USD424 million to USD693 million. Over 2017 to 2021, capital investment grew from USD537 million to USD693 million. (Figure 3)

Figure 2: GVA contribution to the Indonesian economy 2017-2021



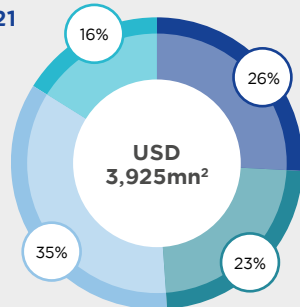
Source: External Consultant analysis

Figure 3: Total capital investment 2017-2021



Source: Axiata

Figure 1: GVA contribution to the Indonesian economy 2021



- USD1,004 mn Operational direct GVA
- USD919 mn Operational indirect and induced GVA
- USD1,376 mn Productivity
- USD626 mn GVA by capital investment

Notes:
¹ Based on simple average of general industry
² Totals may not add up due to rounding
 Source: External Consultant analysis

National Contribution Report

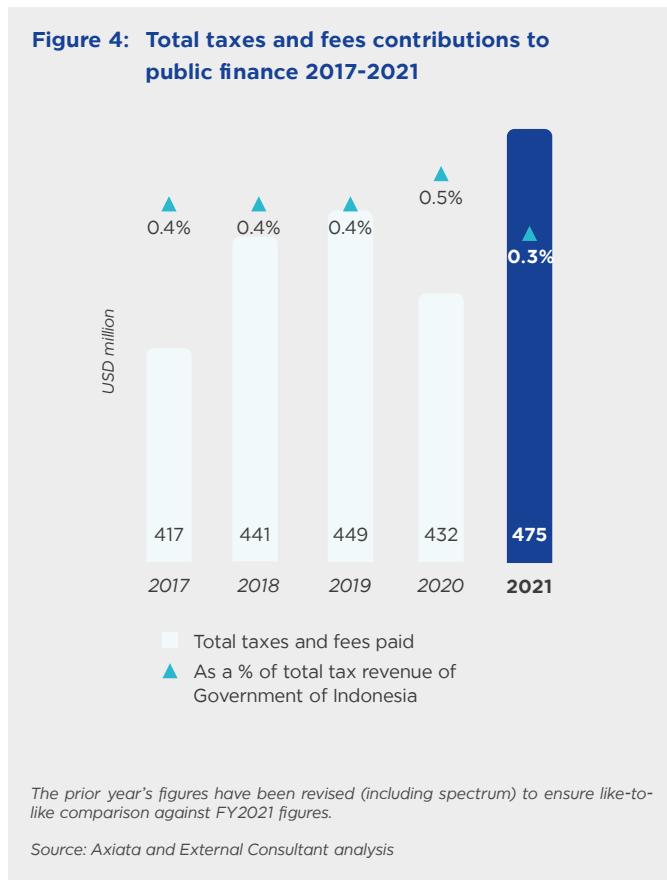
Malaysia	Cambodia	Indonesia	Sri Lanka	Bangladesh	Nepal	edotco
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Economic and Financial Contribution to the Nation

Contributions to Public Finance

Total accumulated taxes and fees contributions to public finance over the last five years reached USD2.2 billion.

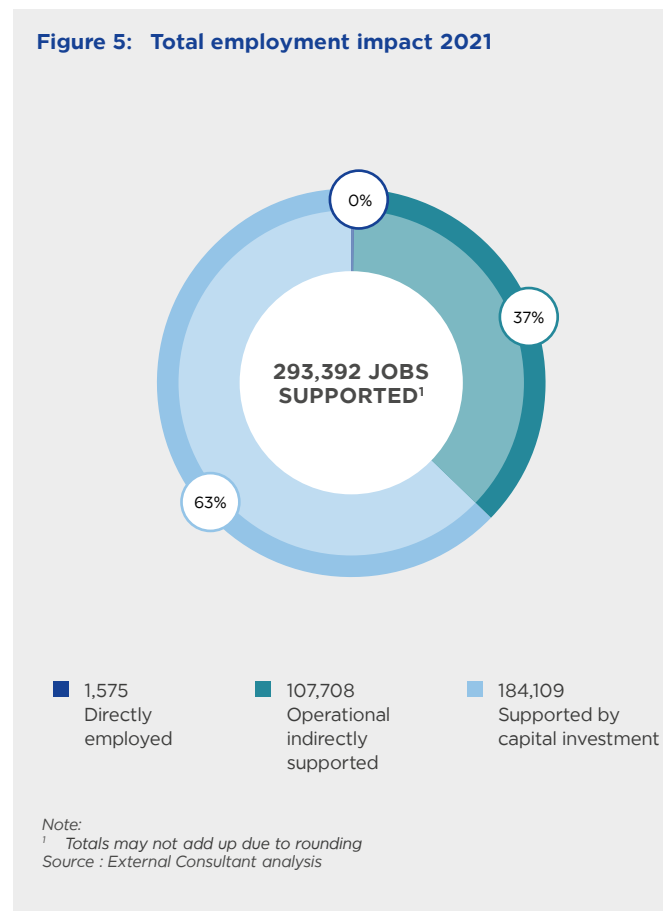
Annual taxes and fees contributions was relatively stable over the last five years. In 2021, it contributed USD475 million, accounting for 0.3% of total tax revenue of Government of Indonesia. (Figure 4)



Total Employment Impact

XL directly provided 1,575 jobs in 2021. 99% of total employees were Indonesian and around 30% of XL employees were women.

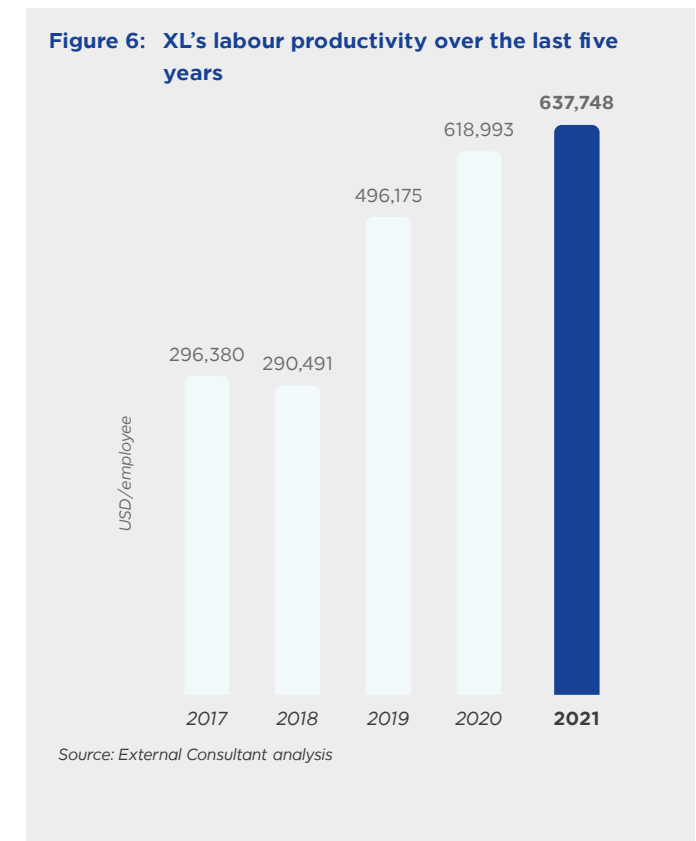
A further 107,808 jobs were supported indirectly by its operations. XL's capital investment supported 184,109 jobs. (Figure 5)



XL's Labour Productivity over the Last Five Years

XL's productivity, measured as Gross Value Added (GVA) per employee, reached USD637,748 in 2021. It grew by a CAGR of 21.1% from USD296,380 in 2017. Shrinking employment with relatively stable operating profits supported the growth in productivity.

A sudden increase in labour productivity was observed from 2019-2021. This was mainly due to the reduction of outsourced employees. (Figure 6).



National Contribution Report

Malaysia

Cambodia

Indonesia

Sri Lanka

Bangladesh

Nepal

edotco

SRI LANKA



Dialog operates Sri Lanka's largest and fastest growing mobile telecommunications network serving over 17 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

USD1,335 million (1.7% of the Nation's GDP)

Operational Direct GVA:

USD361 million

Operational Indirect and Induced GVA:

USD370 million

Capital Investment GVA:

USD150 million

Productivity GVA:

USD454 million

- Dialog's total Gross Value Added (GVA) contribution to the Sri Lanka economy reached USD1,335 million accounting for 1.7% of total national GDP in 2021.
- Dialog's operations directly and indirectly contributed USD731 million, accounting for 55% of total GVA contribution.
- Capital investments contributed USD150 million, representing a share of 11% of total GVA contribution.
- GVA contribution due to the productivity improvement was USD454 million accounting for 34% of the total GVA contribution.



**Direct
Employees**

3,035

Female

24%

Sri Lankan

99.7%

- 3,035 staff were directly employed by Dialog in 2021.
- Around 24% of total employees were women.
- Sri Lankans accounted for 99.7% of total employees.



Total Jobs Supported

95,446

Directly

Employed:

3,035

Operational

indirectly

supported:

37,933

Supported by

Capital

Investment:

53,481

Outsourced:

996

- Overall, Dialog supported over 95,446 jobs in 2021 through its operations and capital investments.
- Dialog's operations directly supported over 3,000 jobs and indirectly supported nearly 38,000 jobs.
- Dialog's capital investment supported around 53,481 jobs.



**Capital + Operational
Expenditure**

USD573 million

Operational Expenditure:

USD413 million

Capital Expenditure:

USD160 million

Every **USD1**
spent on capex

translates to:

USD7.5 GVA
Contribution

Dialog's total Capital and Operational Expenditure reached USD573 million in 2021, with Capital Expenditure recorded at USD160 million (28%) and Operational Expenditure at USD413 million (72%).

For every USD1 Dialog spent in Sri Lanka through its capital investment, it added USD7.5 GVA to the Sri Lankan economy in 2021.



**Contribution to
Public Finance**

USD117 million

(1.2% of total tax revenue of Government of Sri Lanka)

Dialog contributed USD117 million in total taxes and fees paid, accounting for 1.2% of total tax revenue of Government of Sri Lanka¹.

Note:

¹ Source: Total government tax revenue in Sri Lanka was LKR1,984 billion (USD10 billion). (Source: Ministry of Finance, Sri Lanka)

National Contribution Report

Malaysia	Cambodia	Indonesia	Sri Lanka	Bangladesh	Nepal	edotco
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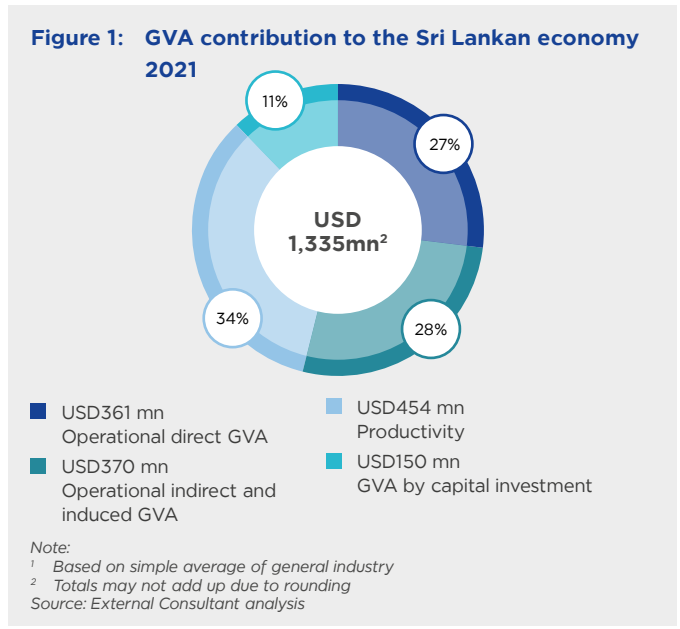
Economic and Financial Contribution to the Nation

Dialog's Total Economic Contribution to the Sri Lankan Economy

Dialog's substantial operational activities and capital investment contributed significantly to the Sri Lankan economy in 2021. Led by Dialog's total operating expenditure of USD413 million and capital investment of USD160 million, Dialog's total Gross Value Added (GVA) contribution to Sri Lanka's economy was USD1,335 million in 2021, accounting for 1.7% of national GDP.

Dialog's operations directly contributed USD361 million, representing a share of 27% of total GVA contribution. Another USD370 million was indirectly generated through the expenditures by Dialog's suppliers, accounting for 28% of total GVA. For every USD1 Dialog contributed directly to the economy, another USD1 was generated indirectly through local suppliers, higher than a general industry average of USD0.4¹.

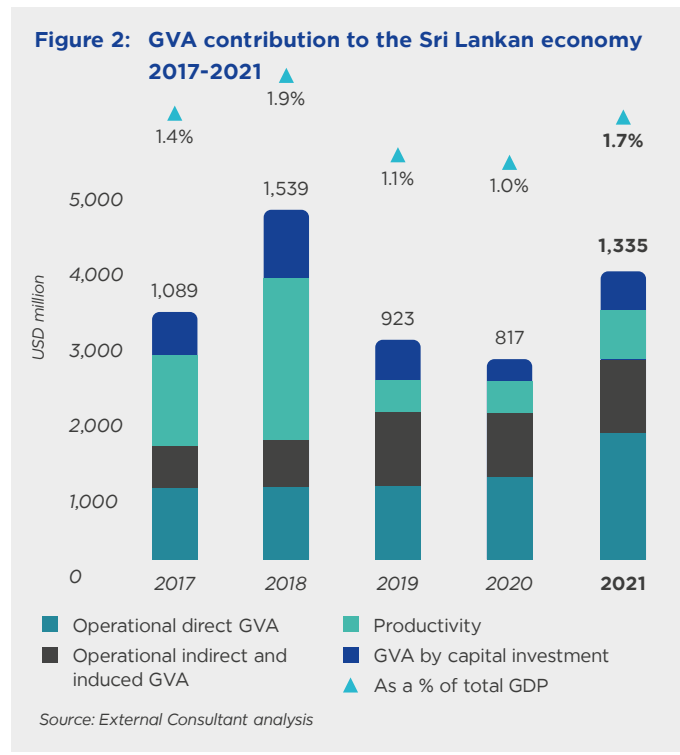
Productivity improvements contributed USD454 million, accounting for 34% of total GVA. (Figure 1)



Dialog's Total Economic Contribution over the Last Five Years

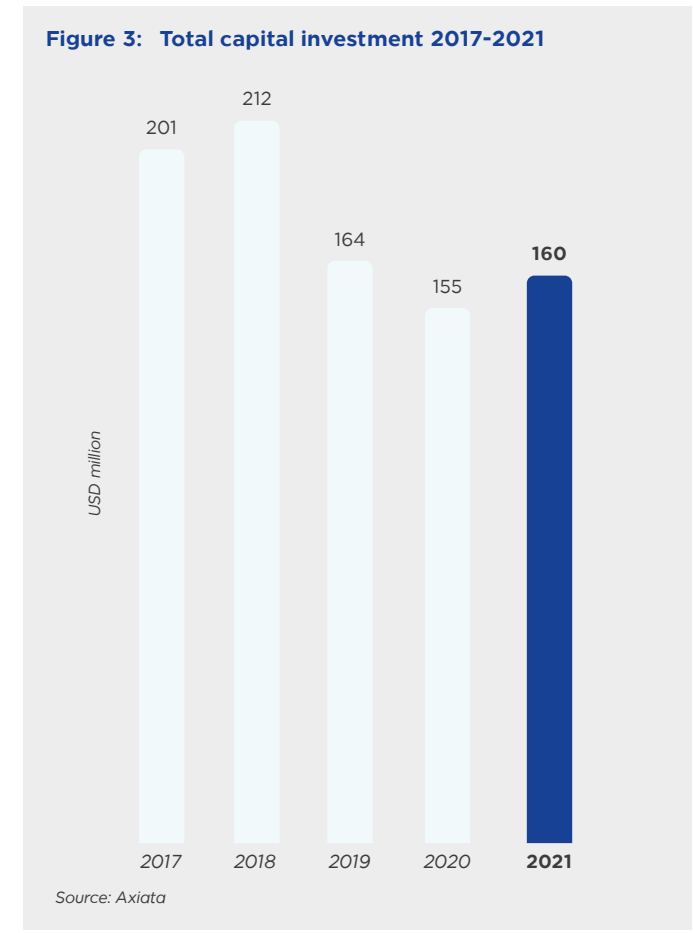
Dialog's total GVA contribution grew at a CAGR of 5.2% from USD1,089 million to USD1,335 million over the last five years. The contribution accounted for 1.7% of the nation's GDP in 2021. This is mainly driven by expanded mobile subscription and increased operating profits.

Total operational profits increased by 7% annually from USD231 million in 2020 to USD301 million in 2021. Sri Lanka's mobile subscription rose from 28.7 million in 2020 to 30 million in 2021, representing an increase in national mobile penetration rate from 131% to 139%. (Figure 2).



Investing and Innovation for the Long Term

Dialog's total accumulated capital investment reached USD892 million over 2017-2021. Capital Investment was USD160 million in 2021. Continuous capital investment supports Dialog's long-term development and contributes to the growth of the Sri Lanka economy. (Figure 3)



National Contribution Report

Malaysia	Cambodia	Indonesia	Sri Lanka	Bangladesh	Nepal	edotco
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Economic and Financial Contribution to the Nation

Contributions to Public Finance

From 2017 to 2021, Dialog has contributed USD848 million of taxes and fees contributions to public finance. Annual taxes and fees contributions slightly decreased over the period.

In 2021, Dialog contributed USD117 million in total taxes and fees paid, accounting for 1.2% of total tax revenue of Government of Sri Lanka. (Figure 4)

Total Employment Impact

Dialog's direct operations generated 3,035 jobs in 2021. 30% of the total employees were female. Dialog 99.7% of total employees were locals.

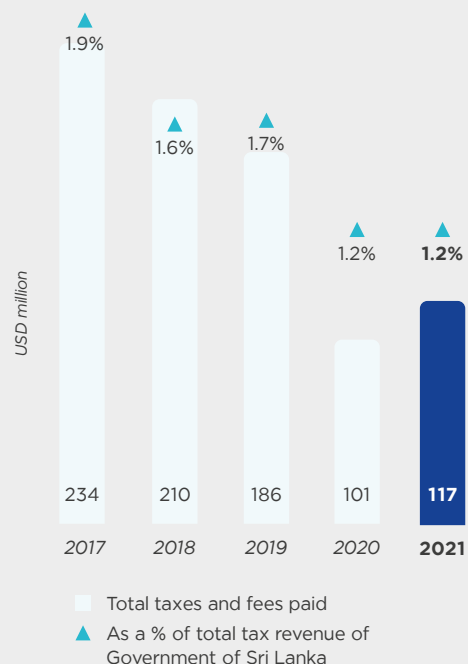
A further 37,933 jobs were supported indirectly by Dialog's operations. Its capital investment supported 53,481 jobs. (Figure 5)

Dialog's Labour Productivity

Dialog's productivity, measured as Gross Value Added (GVA) per employee, grew by a CAGR of 6.7% from USD69,062 in 2017 to USD89,451 in 2021.

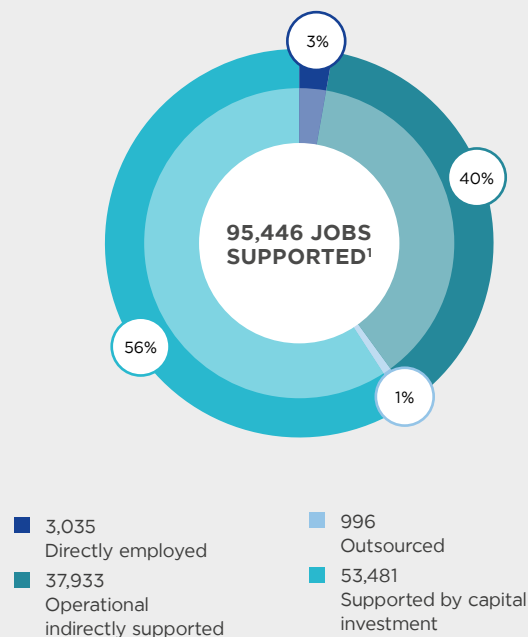
A decrease in labour productivity of 8% was observed for 2021 due to a sizeable increase in employment. Total number of employees increased by 11% from 2,733 in 2020 to 3,035 in 2021 (Figure 6).

Figure 4: Total taxes and fees contributions to public finance 2017-2021



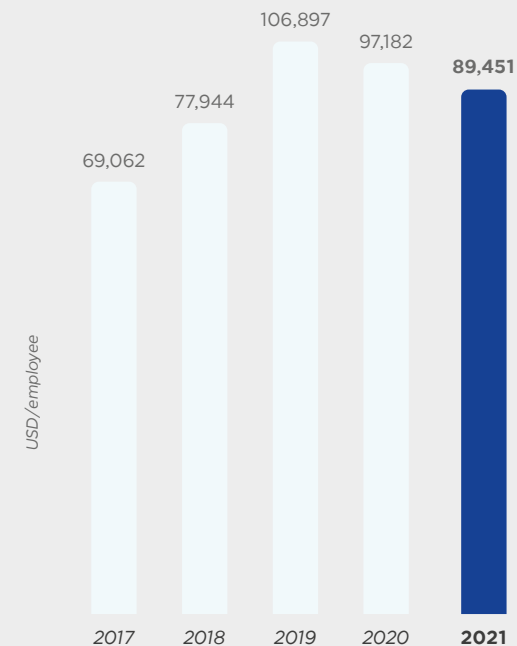
Source: Axiata and External Consultant analysis

Figure 5: Total employment impact 2021



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

Figure 6: Dialog's labour productivity 2017-2021



Source: External Consultant analysis

National Contribution Report

Malaysia

Cambodia

Indonesia

Sri Lanka

Bangladesh

Nepal

edotco

BANGLADESH

Robi is the second largest mobile network operator in Bangladesh, serving more than 53.7 million customers. It was the first company in Bangladesh to launch 4.5G service in all the 64 districts of the country. By the end of 2021, Robi ensured 98.1% population coverage of its 4.5G network with 14,810 sites. It is the only mobile operator in Bangladesh to have successfully conducted the trial run of 5G and the first operator to have launched Voice over LTE technology on its 4.5G network. As the industry leader in innovative digital services, the company has introduced many first of its kind digital services in the country and has been the pioneer in paving the way for taking mobile financial services to the underserved communities in the rural and semi-urban areas.



Contribution to Gross Value Added

USD1,664 million (0.5% of the Nation's GDP)

Operational Direct GVA:
USD433 million

Operational Indirect and Induced GVA:
USD404 million

Capital Investment GVA:
USD251 million

Productivity GVA:
USD576 million

- Robi's total Gross Value Added (GVA) contribution to the Bangladesh economy reached USD1,664 million, accounting for 0.5% of total national GDP in 2021.
- Robi's operations directly and indirectly contributed USD837 million, accounting for 50% of total GVA contribution.
- Capital investments contributed USD251 million with a share of 15% of total GVA.
- GVA contribution due to the productivity improvement was USD576 million, accounting for 35% of the total GVA.



Direct Employees

1,253

Female
13%

Bangladeshi
99.9%

- 1,253 staff were directly employed by Robi in 2021.
- 13% of total employees were women.
- Bangladeshi citizens accounted for 99.9% of total employees.



Total Jobs Supported

113,111

Directly Employed:

1,253

Operational indirectly supported:

72,164

Supported by Capital Investment:

39,694

- Overall, Robi supported over 113,100 jobs in 2021 through its operations and capital investments.
- Robi's operations directly supported over 1,253 jobs and indirectly supported over 72,164 jobs.
- Robi's capital investment supported around 40,000 jobs.



Capital + Operational Expenditure

USD790 million

Operational Expenditure:
USD568 million

Capital Expenditure:
USD222 million

Every **USD1** spent on capex translates to:
USD7.5 GVA Contribution¹

Robi's total Capital and Operational Expenditure reached USD790 million in 2021, with Capital Expenditure recorded at USD222 million (28%) and Operational Expenditure at USD568 million (72%).

For every USD1 Robi spent in Bangladesh through its capital investment, it added USD7.5 GVA to the Bangladesh economy in 2021.



Contribution to Public Finance

USD539 million

(1.4% of total tax revenue of Government of Bangladesh)

Robi contributed USD539 million in total taxes and fees paid accounting for 1.4% of total tax revenue of the Government of Bangladesh².

Notes:

¹ Including GDP contribution from market penetration related productivity impact

² Total government tax revenue was BDT3,300 billion (USD39 billion). (Source: Ministry of Finance, Bangladesh)

National Contribution Report

Malaysia	Cambodia	Indonesia	Sri Lanka	Bangladesh	Nepal	edotco
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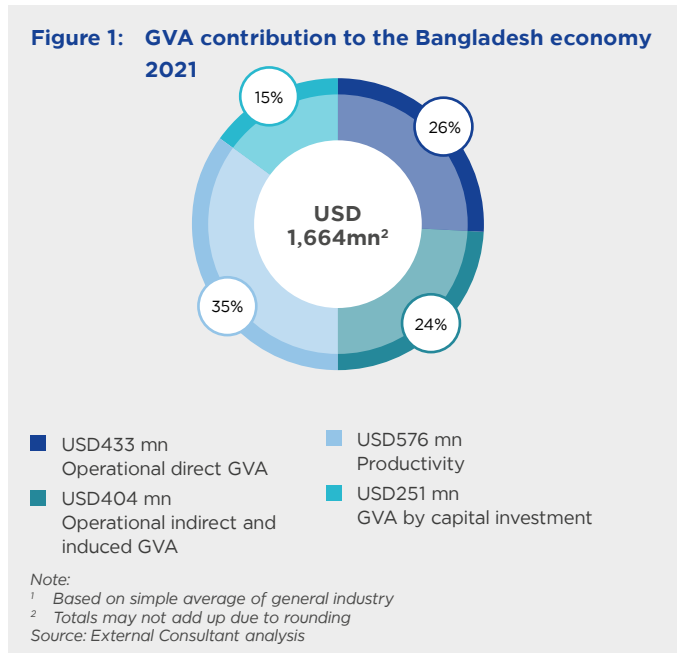
Economic and Financial Contribution to the Nation

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 USD568 million and capital investment of USD222 million, Robi contributed USD1,664 to the economy of Bangladesh in 2021, accounting for 0.5% of national GDP.

Robi's operations directly contributed USD433 million, accounting for 26% of total GVA contribution. Another USD404 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, higher than an average of USD0.4 for general industry¹.

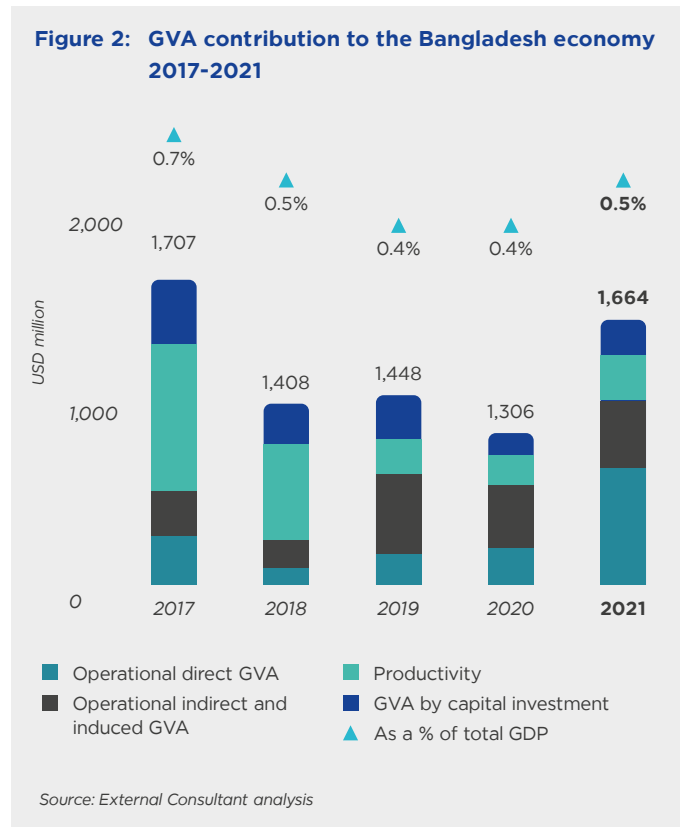
Productivity improvements contributed USD576 million, accounting for 35% of total GVA. Capital investment contributed a further USD251 million, representing a share of 15% of the total GVA. (Figure 1)



Robi's Total Economic Contribution over the Last Five Years

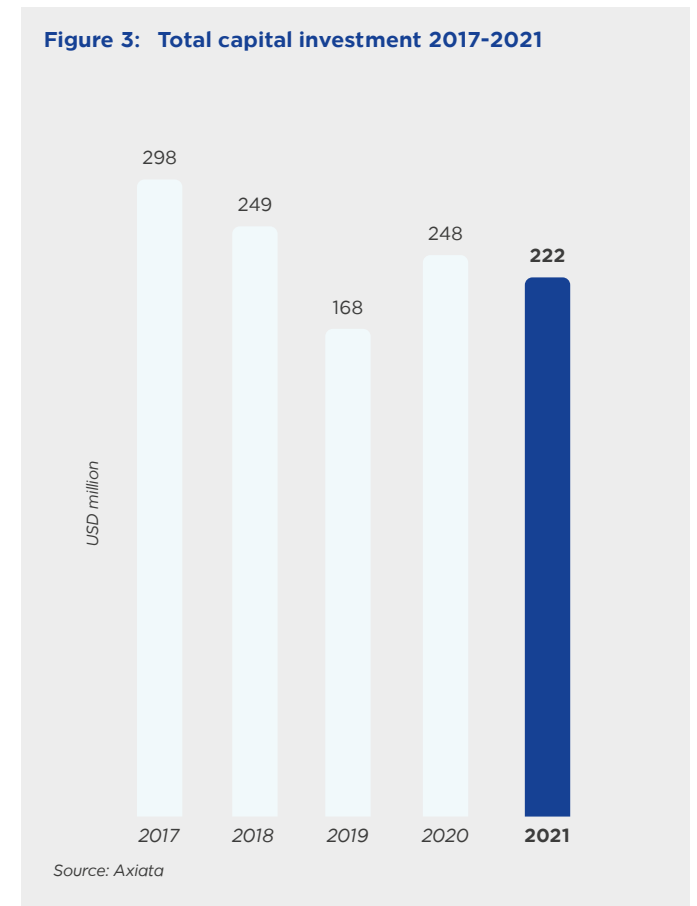
Robi's total GVA contribution fell at a CAGR of -1% from USD1,707 million in 2017 to USD1,664 million in 2021, representing a 0.5% of the national GDP in 2021. Total GVA rose from 2020 mainly due to improved productivity in Bangladesh.

Robi's total GVA grew by 27% over 2020-2021 from USD1,306 million. GVA contribution from productivity impact increased in 2021, mainly due to an increase in the mobile penetration rate. (Figure 2)



Investing and Innovation for the Long Term

Robi's capital investment was USD222 million in 2021. The total accumulated capital investment reached USD1,185 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's economy. (Figure 3)



National Contribution Report

Malaysia	Cambodia	Indonesia	Sri Lanka	Bangladesh	Nepal	edotco
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Economic and Financial Contribution to the Nation

Contributions to Public Finance

Total accumulated taxes and fees contributions to public finance over the last five years reached USD2,090 million.

Annual taxes and fees contributions in 2021 was USD539 million, accounting for 1.4% of total tax revenue of the Government of Bangladesh. (Figure 4)

Total Employment Impact

1,253 jobs were directly provided by Robi's operations in 2021. 13% of Robi's employees were women. The firm is predominated by Bangladesh citizens with 99.9%.

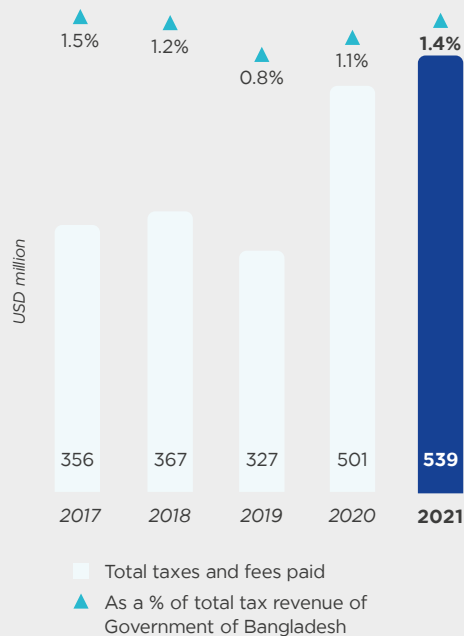
Robi's operations also indirectly supported 72,164 jobs. A further 39,694 jobs were supported by its capital investment. (Figure 5)

Robi's Labour Productivity

Robi's productivity, measured as Gross Value Added (GVA) per employee, increased by a CAGR of 28.9% to USD345,400 in 2021 from USD125,045 in 2017, mainly driven by decreasing employment number and increasing operating profits.

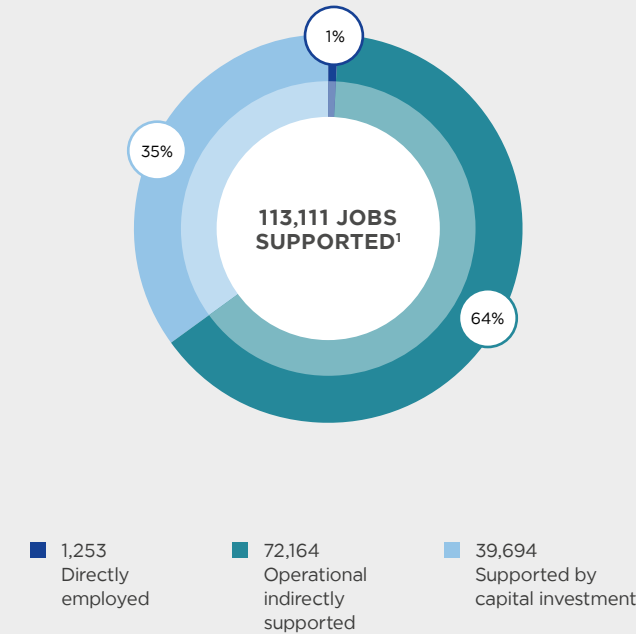
Robi's productivity grew by 12.5% from USD307,046 per worker over 2020-2021, mainly due to a 2.8% increase in operating profits. (Figure 6)

Figure 4: Total taxes and fees contributions to public finance 2017-2021



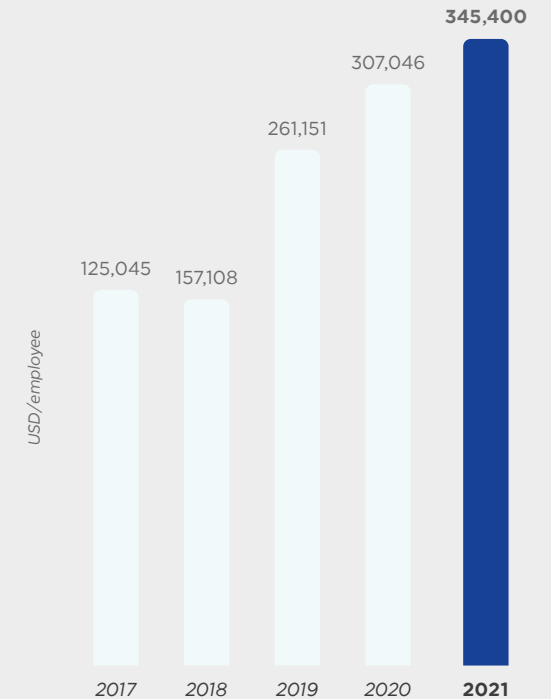
Source: Axiata and External Consultant analysis

Figure 5: Total employment impact 2021



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

Figure 6: Robi's labour productivity 2017-2021



Source: External Consultant analysis

National Contribution Report

Malaysia

Cambodia

Indonesia

Sri Lanka

Bangladesh

Nepal

edotco

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 16.8 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

USD442 million (1.4% of the Nation's GDP)

Operational Direct GVA: **USD242 million**
Operational Indirect and Induced GVA: **USD86 million**

Capital Investment GVA: **USD40 million**
Productivity GVA: **USD73 million**

- Ncell's total Gross Value Added (GVA) contribution to the Nepal economy reached USD442 million accounting for 1.4% of total national GDP in 2021.
- Ncell's operations directly and indirectly contributed USD328 million accounting for 74% of total GVA contribution.
- Capital investments contributed USD40 million with a share of 9% of total GVA.
- GVA contribution due to the productivity improvement was USD73 million accounting for 17% of the total GVA.



Direct Employees

537

Female
24%

Nepalese
98%

- 537 staff were directly employed by Ncell in 2021.
- Around 24% of total employees were female.
- Nepalese residents accounted for 98% of total employees.



Total Jobs Supported

24,940

Directly Employed: **537**
Operational indirectly supported: **16,599**
Supported by Capital Investment: **7,804**

- Overall, Ncell supported 24,940 jobs in 2021 through its operations and capital investments.
- Ncell's operations directly supported 537 jobs. It also indirectly supported around 16,599 jobs.
- Ncell's capital investment supported 7,804 jobs.



Capital + Operational Expenditure¹

USD166 million

Operational Expenditure: **USD115 million**
Capital Expenditure: **USD51 million**

Every **USD1** spent on capex translates to: **USD8.7 GVA** Contribution

Ncell's total Capital and Operational Expenditure reached USD166 million in 2021 with Capital Expenditure recorded at USD51 million (31%) and Operational Expenditure at USD115 million (69%).

For every USD1 Ncell spent in Nepal through its capital investment it added USD8.7 GVA to the national economy in 2021.



Contribution to Public Finance

USD184 million

(2.5% of total tax revenue of Government of Nepal)

Ncell contributed USD184 million in total taxes and fees paid, accounting for 2.5% of total tax revenue of Government of Nepal².

Notes:

¹ Capital expenditure and operational expenditure data provided by Axiata in NPR, then converted to USD

² Estimated total government tax revenue in Nepal was NPR872 billion (USD7.4 billion). (Source: Budget Speech of Fiscal Year 2021/22 Ministry of Finance, Nepal)

* Ncell's financial year ends on 15 July 2021, and the figures here represent Ncell's financial year figures.

National Contribution Report

Malaysia	Cambodia	Indonesia	Sri Lanka	Bangladesh	Nepal	edotco
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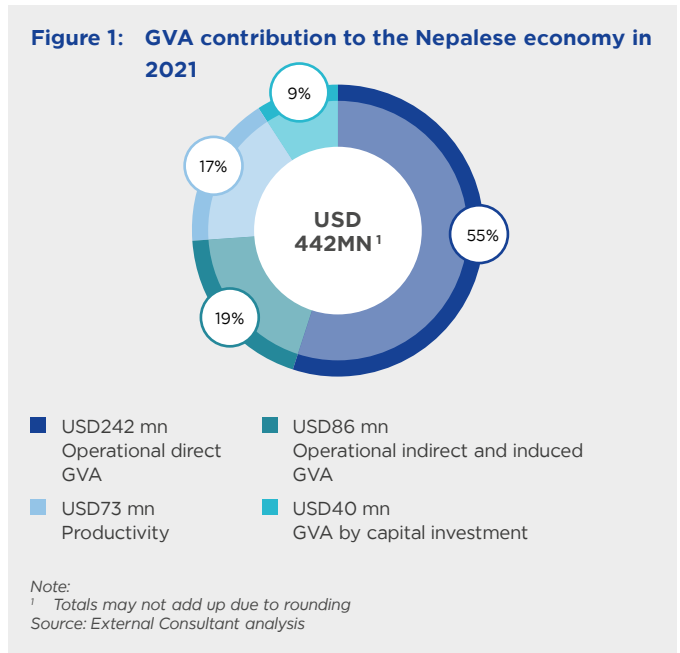
Economic and Financial Contribution to the Nation

Ncell's Total Economic Contribution to Nepal's Economy

Led by Ncell's total operating expenditure of USD115 million and capital investment of USD51 million, Ncell's total Gross Value Added (GVA) contribution to Nepal's economy was estimated at USD442 million in 2021 accounting for 1.4% of national GDP.

Ncell's operations directly contributed USD242 million GVA, accounting for 55% of total GVA. A further USD86 million was indirectly generated through the expenditures by Ncell's suppliers, accounting for 19% of total GVA. For every USD1 Ncell directly added to the economy, it generated another USD0.4 indirectly from local suppliers.

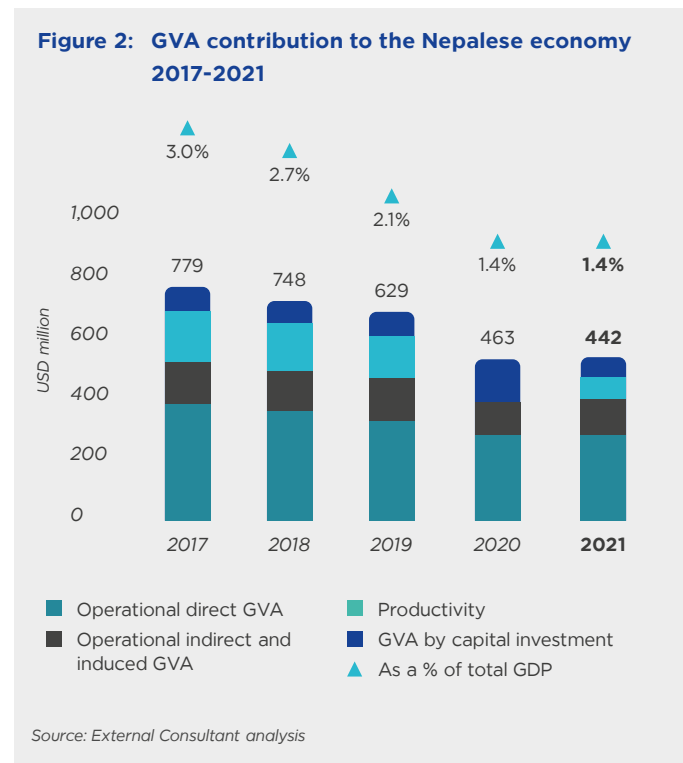
Productivity benefits accrued to USD73 million accounting for 17% of total GVA. A further USD40 million contribution came from capital investment, accounting for 9% of the total GVA. (Figure 1)



Ncell's Total Economic Contribution over the Last Five Years

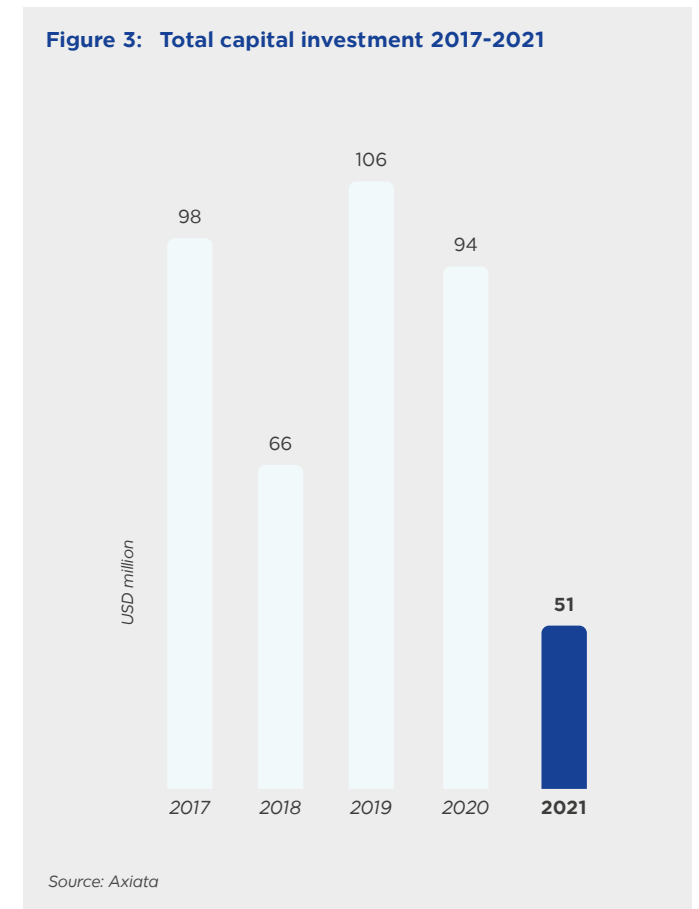
Ncell's total GVA contribution dropped by 43.3% from USD779 million in 2017 to USD442 million in 2021, representing a decreased share of the country's GDP from 3.0% to 1.4%. This was mainly due to the decrease of operating profits and slower growth of mobile penetration.

Ncell's operational profits decreased from USD345 million to USD225 million over 2018-2021. The number of mobile subscribers in Nepal was up from 29.8 million in 2017 to 38.4 million in 2021, which is a penetration growth of 9.3 percentage points over the five-year period. (Figure 2)



Investing and Innovation for the Long Term

Ncell's total accumulated capital investment reached USD414 million over the last five years of operations. Capital investment fell by 46% from USD94 million in 2020 to USD51 million in 2021. Capital investment plays a significant role in enhancing the company's competitiveness and contributing to Nepal's economy. (Figure 3)



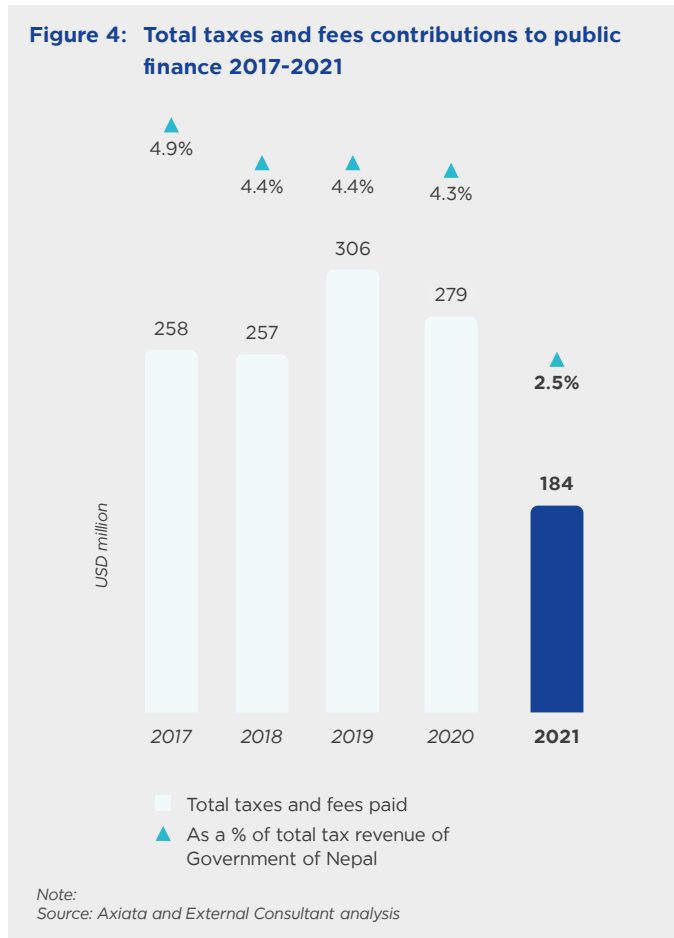
National Contribution Report

Malaysia	Cambodia	Indonesia	Sri Lanka	Bangladesh	Nepal	edotco
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Economic and Financial Contribution to the Nation

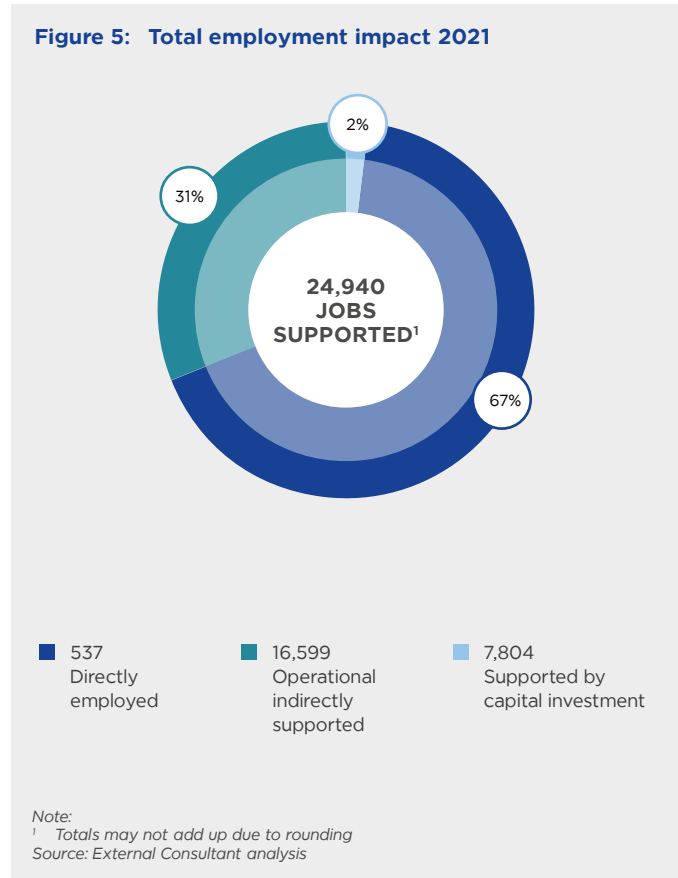
Contributions to Public Finance

In 2021, Ncell contributed USD184 million in total taxes and fees paid, accounting for 2.5% of total tax revenue of Government of Nepal. Accumulated taxes and fees contributions was USD1,284 million for the last five years. (Figure 4)



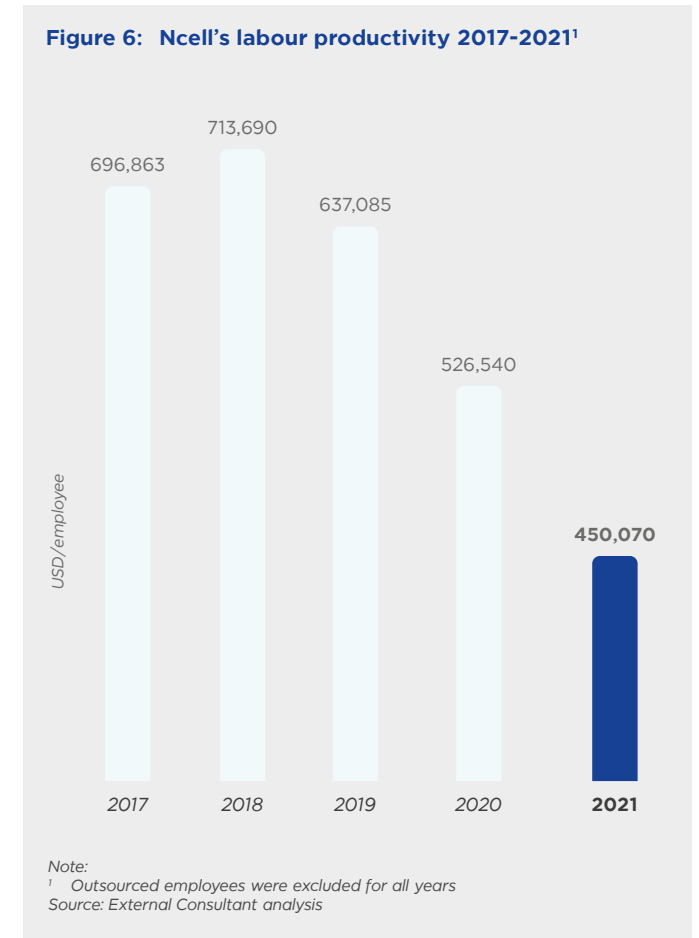
Total Employment Impact

In 2021 there were 24,940 jobs supported by Ncell's business in total. Ncell directly provided 537 jobs in 2021. 98.0% of the firm's employees were Nepalese residents and 24% of the total employees were female. A further 16,599 jobs were supported indirectly by its operations. Ncell's capital investment supported 7,804 jobs. (Figure 5)



Ncell's Labour Productivity

Ncell's productivity, measured as Gross Value Added (GVA) per employee, was estimated at USD450,070 in 2021, a drop by 14.5% from USD526,540 in 2020. This is mainly due to a decrease in operating profits over 2018-2021. (Figure 6)



National Contribution Report

Malaysia

Cambodia

Indonesia

Sri Lanka

Bangladesh

Nepal

edotco

edotco

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). 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

USD777 million
(1.6% of the Nation's GDP)

Operational Direct GVA:	Operational Indirect and Induced GVA:
USD371 million	USD316 million

Capital Investment GVA:
USD90 million

- edotco's total Gross Value Added (GVA) contribution across the eight economies it operates in reached USD777 million. 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 2021.
- edotco's operations directly and indirectly contributed USD687 million, accounting for 89% of total GVA contribution.
- Capital investments contributed USD90 million with a share of 12% of total GVA.



Direct Employees **1,231**

Female
22%

- 1,231 staff were directly employed by edotco in 2021.
- 22% of total employees were women.



Total Jobs Supported **40,882**

Operational indirectly supported:

30,891

Directly Employed: Supported by Capital Investment:

1,231

8,760

- Overall, edotco supported 40,882 jobs in 2021 through its operations and capital investments.
- edotco's operations directly and indirectly supported approximately 32,200 jobs.
- edotco's capital investment supported close to 8,800 jobs.



Capital + Operational Expenditure¹

USD432 million

Operational Expenditure:	Capital Expenditure:
USD179 million	USD253 million

edotco's total Capital and Operational Expenditure reached USD432 million in 2021, with Capital Expenditure recorded at USD253 million (58%) and Operational Expenditure at USD179 million (41%).

Every **USD1**
spent on capex
translates to:
USD3.1 GVA
Contribution¹

For every USD1 edotco spent through its capital investment, it added USD3.1 GVA in 2021 to the economies it operates in.



Contribution to Public Finance

USD89 million

(0.04% of total tax revenue of the Governments of countries it operates in)

edotco contributed USD89 million in total tax and fees paid, accounting for 0.04% of total tax/fee revenue of the Governments of countries it operates in.²

Notes:

¹ Capital expenditure and operational expenditure data provided by Axiata in MYR, then converted to USD

² Total tax/fee revenue of Governments is estimated at USD225 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.

National Contribution Report

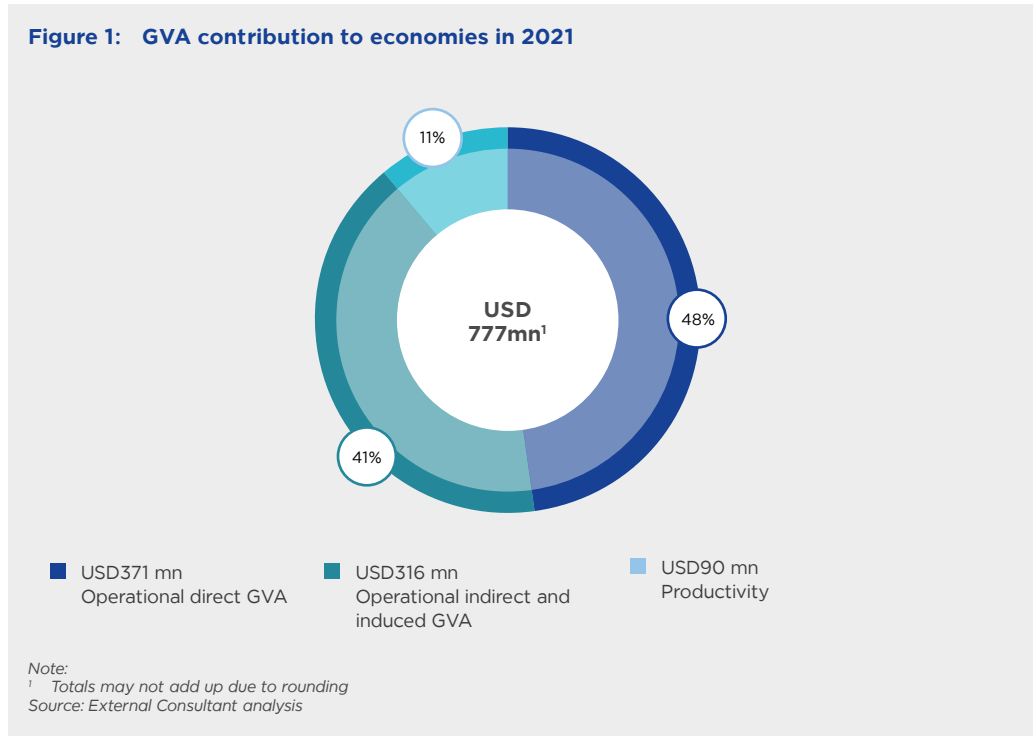
Malaysia	Cambodia	Indonesia	Sri Lanka	Bangladesh	Nepal	edotco
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Economic and Financial Contribution to the Nation

edotco's Total Economic Contribution

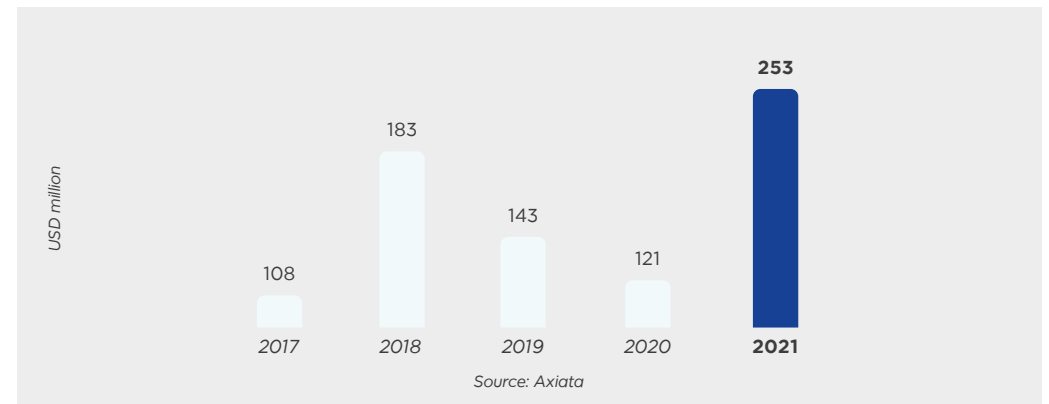
edotco's substantial operations and investments contributed significantly to the economic growth in countries it operates in. With a total operating expenditure of USD179 million and capital investment of USD253 million, edotco contributed USD777 million to the economies. While this is a trivial amount compared to the sum of national GDP across eight countries, for comparison this is approximately 0.2% of Malaysia's national GDP in 2021.

edotco's operations directly contributed USD371 million, accounting for 48% of total GVA contribution. Another USD316 million was indirectly generated through the expenditures by edotco's suppliers. For every USD1 edotco directly added to the economies, it generated just under USD0.9 indirectly from local suppliers. Capital investment contributed a further USD90 million, representing a share of 11% of the total GVA. (Figure 1)



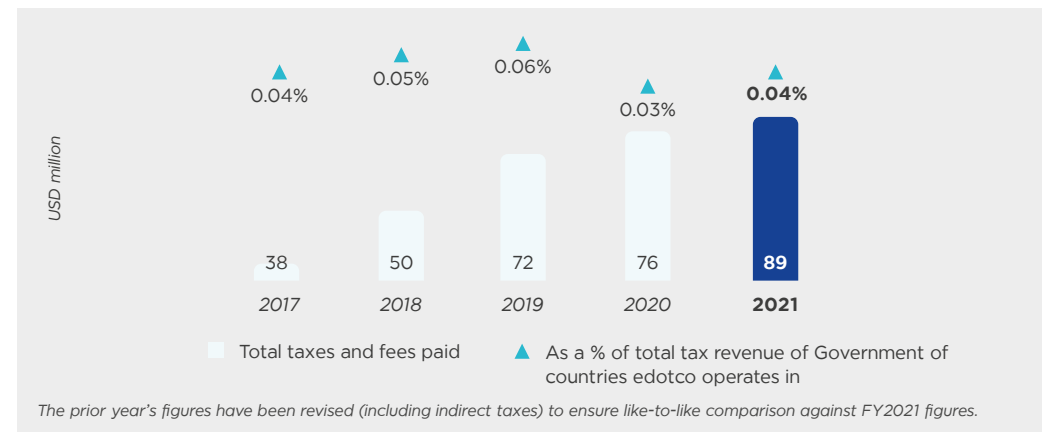
Investing and Innovation for the Long Term

edotco's capital investment was USD253 million in 2021. 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.



Contributions to Public Finance

Annual taxes and fees contributions in 2021 was USD89 million, accounting for 0.04% of total tax revenue of the Government of economies edotco operates in.



National Contribution Report

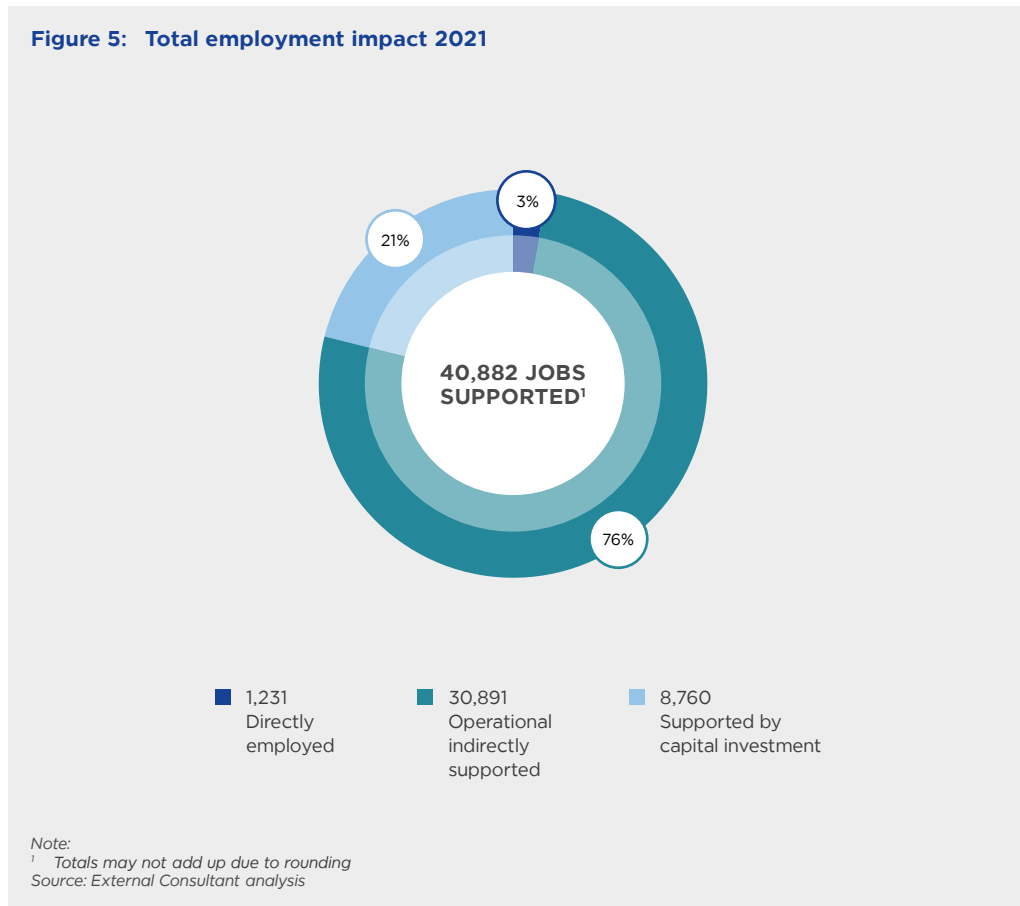
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Economic and Financial Contribution to the Nation

Total Employment Impact

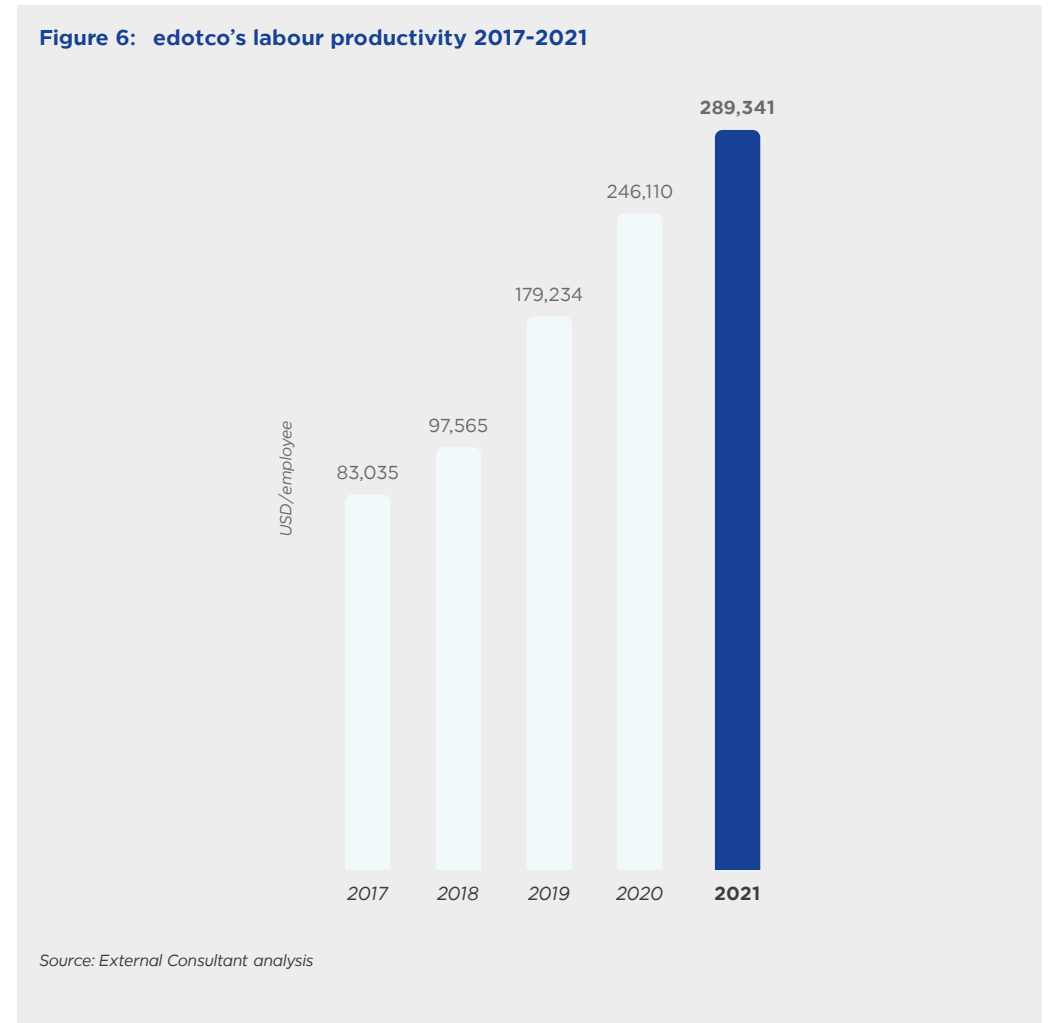
1,231 jobs were directly provided edotco's operations in 2020. 22% of edotco's employees were women.

edotco's operations also indirectly supported 30,891 jobs. A further 8,760 jobs were supported by its capital investment. (Figure 5)



edotco's Labour Productivity

edotco's productivity, measured as Gross Value Added (GVA) per employee was USD289,341 in 2021.



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 (I-O) tables published by OECD, ADB, and national statistical agencies.

Employment is generated through a number of avenues including:

- i. Directly through Axiata and related industries.
- ii. Outsourced support services (if any) including customer support, 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

i. Total Value Added = Capital Expenditure in Host Country x Average Value Added Multiplier

ii. **(a) For countries where employment multipliers are available**

Total Employment in Host Country = Total Capital Expenditure in Host Country x Average Employment Multiplier

(b) For countries where employment multipliers are not available:

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

3. Operational

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

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

Note: Operating expenditure provided by Axiata excludes depreciation

ii. **(a) For countries where employment multipliers are available**

Total Employment = Total Operational Expenditure x Average Employment Multiplier

(b) For countries where employment multipliers are not available:

Total Employment = (Total Indirect Value Added/Average Value per Worker in Host Country) + (Direct Employment as per Axiata data)

iii. Axiata's labour productivity = Direct Value Added/Number of Employees

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

4. Productivity Analysis

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

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

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.

Reducing Disparities In Education

The free-to-air Nenas Educational TV channels, the subscription-free Nenas Educational App, and the toll-free Nenas 1916 student helpline support Sri Lankan students by increasing access to quality educational material and qualified educators. Over 7,000 teachers have developed their digital skills through the Nenas Smart School project

DIALOG NENASA HOME LEARNING

BIOLOGY



About This Report

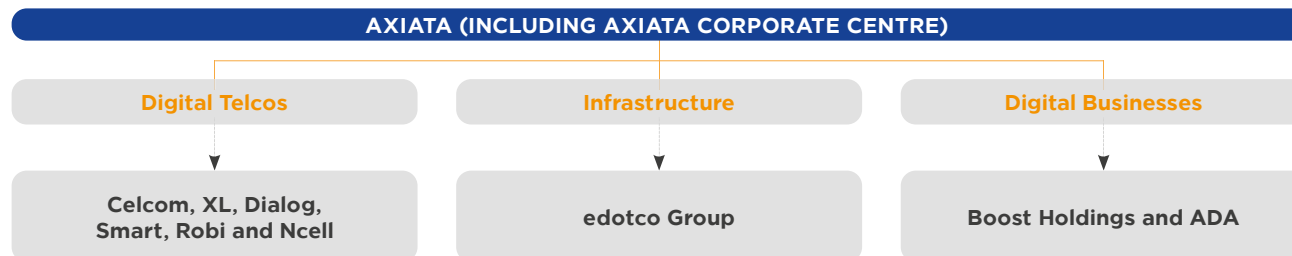
This Sustainability and National Contribution Report 2021 should be read together with the Axiata Integrated Annual Report 2021, and the Governance and Audited Financial Statements 2021 to understand how we create value for our stakeholders across our markets.

Report Boundary

The Axiata Sustainability and National Contribution Report 2021 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, we include ADA, Boost Holdings Sdn Bhd, and Axiata Digital Labs. Aspirasi, previously under digital businesses has been rebranded to Boost Credit (under Boost Holdings Sdn Bhd).

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. This Sustainability and National Contribution Report 2021 covers the period from 1 January 2021 to 31 December 2021, unless otherwise stated.

The level of disclosure, covering the Group as a whole as well as disclosure per material matter, has significantly increased in our 2021 Sustainability and National Contribution Report 2021 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 disclosure. Our OpCos are encouraged to produce their own standalone sustainability report to provide more insight into their respective sustainability management and context.



The Group's sustainability disclosure, presented in this Sustainability and National Contribution Report 2021 as well as on our corporate sustainability website, details 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 ninth 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. This report has been prepared in accordance with the GRI Standards: Core option.

Data Measurement Techniques and Assumptions

All financial data disclosed in this report is identical to that of Axiata Integrated Annual Report 2021 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 Group Berhad including its Operating Companies. This year we included in the assurance scope six indicators across Environment, Social and Governance. 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". For more information on the subject matter and scope of assurance, please refer to the assurance statement on page 130.

Our Sustainability Matters

Material Matters	Description	Importance to the Group	Importance to our Stakeholder Groups	Risk Category
NEXT GENERATION DIGITAL CHAMPION				
<ul style="list-style-type: none"> Sustainable Business Growth 	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
<ul style="list-style-type: none"> Network Quality and Coverage 	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
<ul style="list-style-type: none"> Digital Inclusion 	Providing affordable and innovative products and services in bridging the digital gap	Investments in digital services and product innovation allow 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
<ul style="list-style-type: none"> Digitisation and Modernisation 	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 provide 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
ENVIRONMENT				
<ul style="list-style-type: none"> Climate Action 	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
<ul style="list-style-type: none"> Resource and Waste Management 	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

Material Matters	Description	Importance to the Group	Importance to our Stakeholder Groups	Risk Category
SOCIAL				
▶ Fair Employment and Welfare	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 licence to operate in various operating markets.	Embracing a diverse, inclusive and collaborative work culture promotes employee wellbeing and enables our employees to be empowered and to achieve their best in serving the customers' needs.	Geopolitical Risk People Risk
▶ Talent Development	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	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	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	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 are 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	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	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

Material Matters	Description	Importance to the Group	Importance to our Stakeholder Groups	Risk Category
GOVERNANCE				
▶ Business Ethics and Compliance	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
▶ Data Privacy and Cyber Security	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	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
Financial Risk	<p>Risk Owners: Axiata Treasury Management Centre</p> <ul style="list-style-type: none"> ▶ 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, monitoring OpCo dividend policy and setting financial guardrails ▶ Reviewing business structure to identify business leakages and enhance the business model ▶ Closely monitoring developments in Sri Lanka and impacts on Dialog's business, as well as in Myanmar on edotco's business, where the latter's potential impact to the Group is less than 5% of our net assets ▶ Whilst developments in Ukraine have no direct impacts on our businesses as yet, we are closely tracking the likely indirect impact of the conflict
Market Risk	<p>Risk Owners: OpCo CEOs</p> <ul style="list-style-type: none"> ▶ 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
Regulatory Risk	<p>Risk Owners: Group Regulatory</p> <ul style="list-style-type: none"> ▶ 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 address and highlight concerns of the telco sector, to advocate sustainable regulatory regimes ▶ Participating in government consultations and industry events, to foster collaboration and knowledge sharing for best industry policies and practices ▶ Dedicated Subject Matter Experts (SMEs) to monitor regulatory compliance at Group level and across all OpCos
Cyber and Data Privacy Risk	<p>Risk Owners: Group Risk and Compliance</p> <ul style="list-style-type: none"> ▶ 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 NIST Framework, IAPP1/ CIPM2 and CMMI3 based 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 ▶ Embedding Cyber Security and Data Privacy controls by design across all business facets by incorporating the related standards and requirements in: <ul style="list-style-type: none"> • Protecting our hardware and software • Improving Training and Awareness • Reducing third-party risk through the Supplier Code of Conduct and improved contract clauses • Periodic automated assessments and remediation to identify gaps ▶ Incorporating Cyber Security and Data Privacy performance metrics into OpCos KPI scorecards
Operational Risk	<p>Risk Owners: Group Technology, Group Procurement</p> <ul style="list-style-type: none"> ▶ 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

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

Risk Category	Mitigating Actions and Opportunities Arising
Geo-Political Risk	<p>Risk Owners: OpCo Management, Group Regulatory</p> <ul style="list-style-type: none"> ▶ 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 socio-economic development through various CSR programmes
Strategic and Investment Risk	<p>Risk Owners: Mergers and Acquisitions Committee, Group Corporate Development</p> <ul style="list-style-type: none"> ▶ Active M&A activities balanced by robust due diligence to evaluate, manage and anticipate potential risks and challenges ▶ Post-acquisition transitional teams to ensure alignment and adoption of Axiata's organisational, operational and cultural values ▶ Seeking out opportunities for infrastructure sharing to manage cost whilst maintaining strategic alliances ▶ Closely monitoring the market landscape to anticipate other developments that may heighten competition
People Risk	<p>Risk Owners: Group People Division</p> <ul style="list-style-type: none"> ▶ 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 SOPs for Work-In-Office and Work-From-Home arrangements to combat COVID-19 ▶ Enhancing the AxiataCares programme at Group and OpCo levels
Technology Risk	<p>Risk Owners: Group Technology</p> <ul style="list-style-type: none"> ▶ Constantly reviewing and refreshing our technology to remain relevant whilst 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 utilisation ▶ 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 out opportunities for consolidation and synergies
Governance Risk	<p>Risk Owners: Group Risk and Compliance, Group People Division, Group Sustainability</p> <ul style="list-style-type: none"> ▶ Axiata's Code of Conduct guides personnel conducting business for/on behalf of the Group ▶ Implementation of Group-wide Corporate Compliance Programme to build strong governance in conformance to the TRUST principles defined in the MACC Act, and strengthening Axiata's compliance maturity ▶ Establishment of a strong governance structure with the BRCC and the Risk and Compliance Management Committee ▶ Establishing the Sustainability Steering Committee and developing the Sustainability Roadmap ensuring Group-wide efforts towards common goals

List Of Abbreviations

<i>Annual General Meeting (AGM)</i>	<i>First Line Manager (FLM)</i>	<i>Market Capital (Market Cap)</i>
<i>Axiata Corporate Centre (CC)</i>	<i>Get Out of Diesel (GOOD)</i>	<i>Memorandum of Understanding (MoU)</i>
<i>Axiata Digital (AD)</i>	<i>Gigajoule (GJ)</i>	<i>Ministry of Higher Education (MoHE)</i>
<i>Axiata Digital Innovation Fund (ADIF)</i>	<i>Global Reporting Initiative (GRI)</i>	<i>Minority Shareholder Watchdog Group (MSWG)</i>
<i>Axiata Digital Labs (ADL)</i>	<i>Government-Linked Company (GLC)</i>	<i>Malaysia Digital Economy Corporation (MDEC)</i>
<i>Axiata Digital Services (ADS)</i>	<i>Greenhouse Gas (GHG)</i>	<i>Mobile Network Operator (MNO)</i>
<i>Axiata Procurement Centre (APC)</i>	<i>Gross Domestic Product (GDP)</i>	<i>Net Promoter Score (NPS)</i>
<i>Axiata Treasury Management Centre (ATMC)</i>	<i>Gross Value Added (GVA)</i>	<i>Occupational Health and Safety (OHS)</i>
<i>Axiata Young Talent Programme (AYTP)</i>	<i>Group Accelerated Development Programme (GADP)</i>	<i>OpCo Accelerated Development Programme (OADP)</i>
<i>Base Transceiver Stations (BTS)</i>	<i>Group Risk Management Committee (GRMC)</i>	<i>Operating Companies (OpCos)</i>
<i>Board Audit Committee (BAC)</i>	<i>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)</i>	<i>Operating Expenditure (Opex)</i>
<i>Business Continuity Management (BCM)</i>	<i>GSMA's Humanitarian Connectivity Charter (HCC)</i>	<i>Personal Accident (PA)</i>
<i>Business Development Programme (BDP)</i>	<i>High Throughput Satellite (HTS)</i>	<i>Personal Data Protection Act (PDPA)</i>
<i>Capital Expenditure (capex)</i>	<i>Human Resources (HR)</i>	<i>Profit After Tax (PAT)</i>
<i>Compound Annual Growth Rate (CAGR)</i>	<i>Improvement, Innovation, Investment & Impact (4i)</i>	<i>Senior Leadership Team (SLT)</i>
<i>Connected Women Commitment Initiative (CWCI)</i>	<i>Info-communications Media Development Authority (IMDA)</i>	<i>Short Messaging System (SMS)</i>
<i>Corporate Responsibility (CR)</i>	<i>Information and Communications Technology (ICT)</i>	<i>Small and Medium Enterprises (SME)</i>
<i>Corporate Social Responsibility (CSR)</i>	<i>International Finance Corporation (IFC)</i>	<i>Standard & Industrial Research Institute of Malaysia (SIRIM)</i>
<i>Cyber Security Operations Centre (CSOC)</i>	<i>International Long Distance (ILD)</i>	<i>Strategic Partners Development Programme (SDP)</i>
<i>Cyber Security Steering Committee (CSSC)</i>	<i>International Standard on Assurance Engagement (ISAE)</i>	<i>Supplier Performance Management (SPM)</i>
<i>Department of Education (DOE)</i>	<i>Internet Data Centre (IDC)</i>	<i>Sustainability Engagement Index (SEI)</i>
<i>Department of Hydrology & Meteorology (DHM)</i>	<i>Internet of Things (IoT)</i>	<i>Uncompromising Integrity. Exceptional Performance (UI,EP)</i>
<i>Disaster and Emergency Warning Network (DEWN)</i>	<i>Key Performance Indicators (KPI)</i>	<i>University Leadership Development Programme (ULDP)</i>
<i>Direct report of Chief Executive Officer (CEO-1)</i>	<i>Kilowatt (kW)</i>	<i>Unstructured Supplementary Service Data (USSD)</i>
<i>Disaster Readiness Programme (DRP)</i>	<i>Local Partner Development Programme (LPDP)</i>	<i>Value Added Services (VAS)</i>
<i>edotco Group (e.co)</i>	<i>Majlis Amanah Rakyat (MARA)</i>	<i>Vendor Development Programmes (VDP)</i>
<i>Employee Engagement Survey (EES)</i>	<i>Malaysian Communications and Multimedia Commission (MCMC)</i>	<i>Venture Capital (VC)</i>
<i>Enterprise Risk Management (ERM)</i>	<i>Malaysian Sustainability Reporting Awards (MasRA)</i>	<i>Year on Year (YoY)</i>
<i>Environmental, Social and Governance (ESG)</i>		<i>Young CEO Development Programme (YCDP)</i>
<i>Economic, Environmental and Social (EES)</i>		

Data In Numbers

Aspect	Indicator	Detail	Unit	Celcom	XL	Dialog	Robi	Smart	Ncell	edotco	Corporate Centre	Overall	
Market Presence	202-1	Ratios of standard entry level wage vs local min wage	Male	2.0:1	1.4:1	1.6:1	3.4:1	1.0:1	2.0:1	2.5:1	2.5:1	2.1:1	
			Female	2.0:1	1.4:1	1.6:1	3.4:1	1.0:1	1.8:1	2.5:1	2.5:1	2.0:1	
	202-2	Local Senior Management ^{1^}	%	83%	78%	90%	78%	42%	22%	81%	62%	70%	
Procurement Practices	204-1	Percentage local ^{2^}	%	19%	98%	36%	42%	24%	60%	92%	46%	52%	
		Percentage foreign	%	81%	2%	64%	58%	76%	40%	8%	54%	48%	
Energy³	302-1	Direct energy consumption	GJ	579,970.05	89,275.18	72,293.24	23,352.56	61,011.67	40,326.97	-	-	866,229.67	
		Indirect energy consumption	GJ	1,462,424.32	2,895,745.35	705,445.55	1,009,109.45	382,713.83	264,430.00	3,627.75	*	6,723,496.25	
Emissions	305-1	Scope 1 GHG - GHG from fuel [^]	Tonnes CO ₂ e	43,102	7,164	5,357	6,946	4,917	3,157	3,374	-	74,017	
	305-2	Scope 2 GHG - GHG from grid [^]	Tonnes CO ₂ e	220,941	620,274	137,726	187,806	66,492	1,983	595	*	1,235,817	
Employment	401-1	Employees by gender	Male	1,275	1,098	2,296	1,092	501	407	977	119	7,765	
			Female	1,113	477	739	284	130	254	136	3294		
			Total employees	2,388	1,575	3,035	1,253	785	537	1,231	255	11,059**	
	Women in Leadership Positions	Joining the Group - By Gender	Male	44	120	227	122	47	4	95	37	696	
			Female	41	45	129	30	25	3	39	59	371	
			Joining the Group - By Age	< 30 years old	23	58	301	107	55	0	33	46	623
			31-49 years old	50	106	51	44	17	4	90	40	402	
> 50 years old	12	1	4	1	0	3	11	10	42				
Health & Safety	403-1	H&S representation	%	100%	100%	100%	100%	100%	100%	100%	100%	100%	
403-2	Injuries (workforce) Fatalities	Number	0	2	0	0	0	0	0	0	0	2	
		Number	0	0	0	0	0	0	0	0	0	0	
		Lost Day Rate	LTIFR	0	0.39	0	0	0	0	0	0	0	n/a
Training	404-1	Average training hours (by gender) [^]	Male	69.2	53.0	20.6	50.0	40.8	7.8	28.0	2.9	34.0	
			Female	73.8	39.4	18.5	43.0	37.0	8.0	24.0	4.8	31.1	
		Average training hours (by employee category) [^]	Senior Management	55.5	12.3	10.3	32.0	70.0	3.3	27.0	1.2	26.4	
			Mid Management	66.8	58.6	28.4	74.0	98.0	8.1	40.0	5.3	47.4	
			Executive	82.4	54.7	22.7	42.0	15.0	7.5	23.0	1.7	31.1	
	Non-executive	55.1	48.0	6.9	10.0	22.0	8.9	6.0	3.0	20.0			
404-3	Employees receiving performance review ^{4^}	%	100%	100%	100%	100%	100%	100%	100%	100%	100%		
Diversity	405-1	Staff Diversity - By Age Group	< 30 years old	136	204	962	297	389	23	344	37	2,392	
			31-49 years old	1766	1304	1942	917	383	502	838	155	7,807	
			> 50 years old	486	67	131	39	13	12	49	63	860	

Notes:

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

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 This excludes the energy consumed from renewable energy sources.

⁴ Employees receiving performance review is by gender and by employee category, averaged to 1 single total figure

* Corporate Centre 2021 Indirect energy consumption (1,124.87 GJ) and Scope 2 Emissions (182.79 tCO₂e) are not presented in the table above as Corporate Centre is not included in the 2020 baseline and 2021 calculations. For more information on entities included in our baseline and emissions calculation, refer to page 50.

** This figure excludes employees of ADA, Boost and ADL. Our Group-wide total employees (including ADA, Boost Holdings and ADL) for 2021 is 13,181.

^ These data have been externally assured. Refer to the Independent Limited Assurance Report on pages 130 to 132.

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) 2021, and the Governance and Audited Financial Statements (GAFS) 2021.

General Standard Disclosures		Page Number
GRI Standards 102: General Disclosures		
Organisational Profile		
102-1	Name of the organisation	Pg. 5
102-2	Activities, brands, products, and services	Pg. 5-6, IAR Pg. 62-79
102-3	Location of headquarters	IAR Pg. 104
102-4	Location of operations	Pg. 5
102-5	Ownership and legal form	Pg. 5, GAFS Pg. 194
102-6	Markets served	Pg. 5
102-7	Scale of the organisation	Pg. 5, IAR Pg. 62-79
102-8	Information on employees and other workers	Pg. 59-64
102-9	Supply chain	Pg. 72-76
102-10	Significant changes to the organisation and its supply chain	Pg. 120
102-11	Precautionary Principle or approach	Pg. 88-89, GAFS Pg. 35
102-12	External initiatives	Pg. 23
102-13	Membership of associations	Pg. 23-24
Strategy		
102-14	Statement from senior decision-maker	Pg. 7-9
Ethics and Integrity		
102-16	Values, principles, standards, and norms of behaviour	Pg. 60
Governance		
102-18	Governance structure	Pg. 88, IAR Pg. 83-100

General Standard Disclosures		Page Number
Stakeholder Engagement		
102-40	List of stakeholder groups	Pg. 16-18
102-41	Collective bargaining agreements	Pg. 61
102-42	Identifying and selecting stakeholders	Pg. 16-18, IAR Pg. 31-32
102-43	Approach to stakeholder engagement	Pg. 16-18, IAR Pg. 31-32
102-44	Key topics and concerns raised	Pg. 16-18, 121-123
Reporting Practice		
102-45	Entities included in the consolidated financial statements	GAFS Pg. 170-178
102-46	Defining report content and topic Boundaries	Pg. 120
102-47	List of material topics	Pg. 14-15, 121-123
102-48	Restatements of information	Pg. 50, Pg. 126
102-49	Changes in reporting	Pg. 120
102-50	Reporting period	Pg. 120
102-51	Date of most recent report	Pg. 120
102-52	Reporting cycle	Pg. 120
102-53	Contact point for questions regarding the report	sustainability@axiata.com
102-54	Claims of reporting in accordance with the GRI Standards	Pg. 120
102-55	GRI content index	Pg. 127-129
102-56	External assurance	Pg. 130-132

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) 2021, and the Governance and Audited Financial Statements (GAFS) 2021.

GRI Disclosure Number	GRI Disclosure Title	Page Number	External Assurance
GRI Topic-Specific Standards 200: Economic			
201: Economic Performance			
103	Management Approach	IAR Pg. 13-26, 62-79	
201-1	Direct economic value generated and distributed	Pg. 96-118, IAR Pg. 51-61, 62-79	
201-3	Defined benefit plan obligations and other retirement plans	GAFS Pg. 91	
202: Market Presence			
103	Management Approach	Pg. 5, 96	
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	Pg. 126	
202-2	Proportion of senior management hired from the local community	Pg. 126	✓
203: Indirect Economic Impacts			
103	Management Approach	IAR Pg. 13-26, 62-79	
203-1	Infrastructure investments and services supported	IAR Pg. 62-81	
203-2	Significant indirect economic impacts	IAR Pg. 62-81	
204: Procurement Practices			
103	Management Approach	Pg. 72-76	
204-1	Proportion of spending on local suppliers	Pg. 126	✓
205: Anti-Corruption			
103	Management Approach	Pg. 88-90	
205-1	Operations assessed for risks related to corruption	Pg. 88-90	
205-2	Communication and training about anti-corruption policies and procedures	Pg. 88-90	
205-3	Confirmed incidents of corruption and actions taken	See notes	

GRI Disclosure Number	GRI Disclosure Title	Page Number	External Assurance
206: Anti-Competitive Behaviour			
103	Management Approach	Pg. 88-90	
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	None reported	
GRI Topic-Specific Standards 300: Environmental			
302: Energy			
103	Management Approach	Pg. 47-56	
302-1	Energy consumption within the organisation	Pg. 50	
302-3	Energy intensity	Pg. 50	
302-4	Reduction of energy consumption	Pg. 50-53	
305: Emissions			
103	Management Approach	Pg. 47-56	
305-1	Direct (Scope 1) GHG emissions	Pg. 50, 126	✓
305-2	Energy indirect (Scope 2) GHG emissions	Pg. 50, 126	✓
305-4	GHG emissions intensity	Pg. 50	
305-5	Reduction of GHG emissions	Pg. 50-53	
307: Environmental Compliance			
103	Management Approach	Pg. 47-56	
307-1	Non-compliance with environmental laws and regulations	None reported	

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) 2021, and the Governance and Audited Financial Statements (GAFS) 2021.

GRI Disclosure Number	GRI Disclosure Title	Page Number	External Assurance
GRI Topic-Specific Standards 400: Social			
401: Employment			
103	Management Approach	Pg. 59-68	
401-1	New employee hires and employee turnover	Pg. 126	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Pg. 61, GAFS Pg. 90	
402: Labour/Management Relations			
103	Management Approach	Pg. 59	
402-1	Minimum notice periods regarding operational changes	See notes	
403: Occupational Health and Safety			
103	Management Approach	Pg. 67	
403-1	Workers representation in formal joint management-worker health and safety committees	Pg. 67, 126	
403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	Pg. 67, 126	
404: Training and Education			
103	Management Approach	Pg. 65-66	
404-1	Average hours of training per year per employee	Pg. 126	✓
404-2	Programmes for upgrading employee skills and transition assistance programmes	Pg. 65-66	
404-3	Percentage of employees receiving regular performance and career development reviews	Pg. 126	✓
405: Diversity and Equal Opportunity			
103	Management Approach	Pg. 62-63	
405-1	Diversity of governance bodies and employees	Pg. 62-63, 126, IAR Pg. 82-83	
405-2	Ratio of basic salary and remuneration of women to men	Pg. 126	
406: Non-discrimination			
103	Management Approach	Pg. 60	
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. 60	
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Pg. 60	
408: Child Labour			
103	Management Approach	Pg. 60	
408-1	Operations and suppliers at significant risk for incidents of child labour	Pg. 60	
409: Forced or Compulsory Labour			
103	Management Approach	Pg. 60	
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	Pg. 60	
413: Local Communities			
103	Management Approach	Pg. 29-41, 77-84	
413-1	Operations with local community engagement, impact assessments, and development programmes	Pg. 29-41, 77-84	
418: Customer Privacy			
103	Management Approach	Pg. 69, 91-93	
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	None reported	
419: Socioeconomic Compliance			
103	Management Approach	GAFS Pg. 25-26	
419-1	Non-compliance with laws and regulations in the social and economic area	None reported	

Notes:

Disclosure 205-3: We have chosen not to disclose at this time

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

Independent Limited Assurance Report



Independent Limited Assurance Report on Selected Sustainability Information in Axiata Group Berhad's Sustainability & National Contribution Report 2021

To the Board of Directors of Axiata Group Berhad

We have been engaged by Axiata Group Berhad ("Axiata" or "the Company") to perform an independent limited assurance engagement on selected sustainability information, comprising the information set out in the Subject Matter (hereinafter referred to as "Selected Information") for the financial year ended 31 December 2021 as reported by Axiata in its Sustainability & National Contribution Report 2021.

Subject Matter

The Selected Information reported and marked with circumflex symbol (^) in the Axiata's Sustainability & National Contribution Report 2021 on which we provide limited assurance consists of:

- GRI 305-1: Direct (Scope 1) GHG emissions;
- GRI 305-2: Energy indirect (Scope 2) GHG emissions;
- GRI 202-2: Proportion of senior management hired from the local community;
- GRI 204-1: Proportion of spending on local suppliers;
- GRI 404-1: Average training hours per year per employee (by gender and employee category); and
- GRI 404-3: Percentage of employees receiving regular performance and career development reviews

Our assurance was with respect to the year ended 31 December 2021 information only and we have not performed any procedures with respect to earlier periods or any other elements included in the Axiata's Sustainability & National Contribution Report 2021 and, therefore, do not express any conclusion thereon.

Criteria

The Selected Information needs to be read and understood together with the reporting criteria, which Axiata is solely responsible for selecting and applying. The absence of a significant body of established practice on which to draw to evaluate and measure non-financial information allows for different, but acceptable, measurement techniques and can affect comparability between entities.

The reporting criteria used for the reporting of the Selected Information are as follows:

- Axiata's internal sustainability reporting guidelines and procedures by which the Selected Information is gathered, collated and aggregated internally; and
- The Global Reporting Initiative's Sustainability Reporting Standards ("GRI standards") for disclosures (collectively referred to as the "Criteria").

Management's Responsibility

Management of Axiata is responsible for the preparation of the Selected Information included in the Axiata's Sustainability & National Contribution Report 2021 in accordance with Axiata's internal sustainability reporting guidelines and procedures and the GRI Standards.

This responsibility includes the selection and application of appropriate methods to prepare the Selected Information reported in the Axiata's Sustainability & National Contribution Report 2021 as well as the design, implementation and maintenance of internal control relevant for the preparation of the Selected Information that is free from material misstatement, whether due to fraud or error. Furthermore, the responsibility includes the use of assumptions and estimates for disclosures made by Axiata which are reasonable in the circumstances.

Independent Limited Assurance Report



Our Responsibility

Our responsibility is to express a limited assurance conclusion on the Subject Matter based on the procedures we have performed and the evidence we have obtained. We conducted our limited assurance engagement in accordance with the approved standard for assurance engagements in Malaysia, International Standard on Assurance Engagements ("ISAE") 3000 (Revised) "Assurance Engagements Other Than Audits or Reviews of Historical Financial Information".

This standard requires that we plan and perform this engagement under consideration of materiality to express our conclusion with limited assurance about whether the Selected Information is free from material misstatement.

The accuracy of the Selected Information is subject to inherent limitations given their nature and methods for determining, calculating and estimating such data. Our limited assurance report should therefore be read in conjunction with the Criteria.

A limited assurance engagement involves assessing the suitability in the circumstances of Axiata's use of the Criteria as the basis for the preparation of the Subject Matter, assessing the risks of material misstatement of the Selected Information whether due to fraud or error, responding to the assessed risks as necessary in the circumstances, and evaluating the overall presentation of the Subject Matter. A limited assurance engagement is substantially less in scope than a reasonable assurance engagement in relation to both the risk assessment procedures, including an understanding of internal control, and the procedures performed in response to the assessed risks.

Independence and Quality Control

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

We apply International Standard on Quality Control 1 "Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements", and accordingly maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Independent Limited Assurance Report



Main Assurance Procedures

Our work, which involved no independent examination of any of the underlying financial information, included the following procedures:

- Inquired personnel responsible for data collection, collation and reporting of the Selected Information at the corporate and operating unit level, regarding the processes to prepare the said report and the underlying controls over those processes;
- Inquired personnel responsible for the Selected Information regarding the processes to prepare the said report and the underlying controls over those processes;
- Inquired personnel responsible for data collection, collation and reporting of the Selected Information at the corporate and operating unit level;
- Performed limited substantive testing on a sampling basis on transactions included in the Selected Information, by inspecting internal documents, reports, data capture forms, invoices, where applicable, to support the Selected Information including observation of management's controls over the processes;
- Checked the formulas, proxies and default values used in the Selected Information against Axiata's internal sustainability reporting guidelines and procedures; and
- Considered the appropriateness of the disclosures and presentation of the Selected Information to the relevant GRI standards.

Conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that, in all material respects, the Selected Information in the Subject Matter has not been fairly stated in accordance with Axiata's internal sustainability reporting guidelines and procedures.

Restriction on use

This report, including our conclusions, has been prepared solely for the Board of Directors of Axiata in accordance with the agreement between us, in connection with the performance of an independent limited assurance on the Selected Information as reported by Axiata in its Axiata's Sustainability & National Contribution Report 2021. Accordingly, this report should not be used or relied upon for any other purposes. We consent to the inclusion of this report in the Axiata's Sustainability & National Contribution Report 2021 to be disclosed in the website of Axiata at www.axiata.com, in respect of the financial year ended 31 December 2021, to assist the Directors in responding to their governance responsibilities by obtaining an independent limited assurance report on the Selected Information in connection with the preparation of Axiata's Sustainability & National Contribution Report 2021. As a result, we will not accept any liability or assume responsibility to any other party to whom our report is shown or into whose hands it may come. Any reliance on this report by any third party is entirely at its own risk.

Yours faithfully,

A handwritten signature in black ink that reads 'PricewaterhouseCoopers' in a cursive, stylized font.

PRICEWATERHOUSECOOPERS PLT
LLP0014401-LCA & AF 1146
Chartered Accountants

Kuala Lumpur
26 April 2022

