



ELEVATING LIVELIHOODS THROUGH SUSTAINABLE INNOVATIONS

Building a sustainable future for all,
where no one is left behind.

SUSTAINABILITY AT CORE



OUR APPROACH TO SUSTAINABILITY

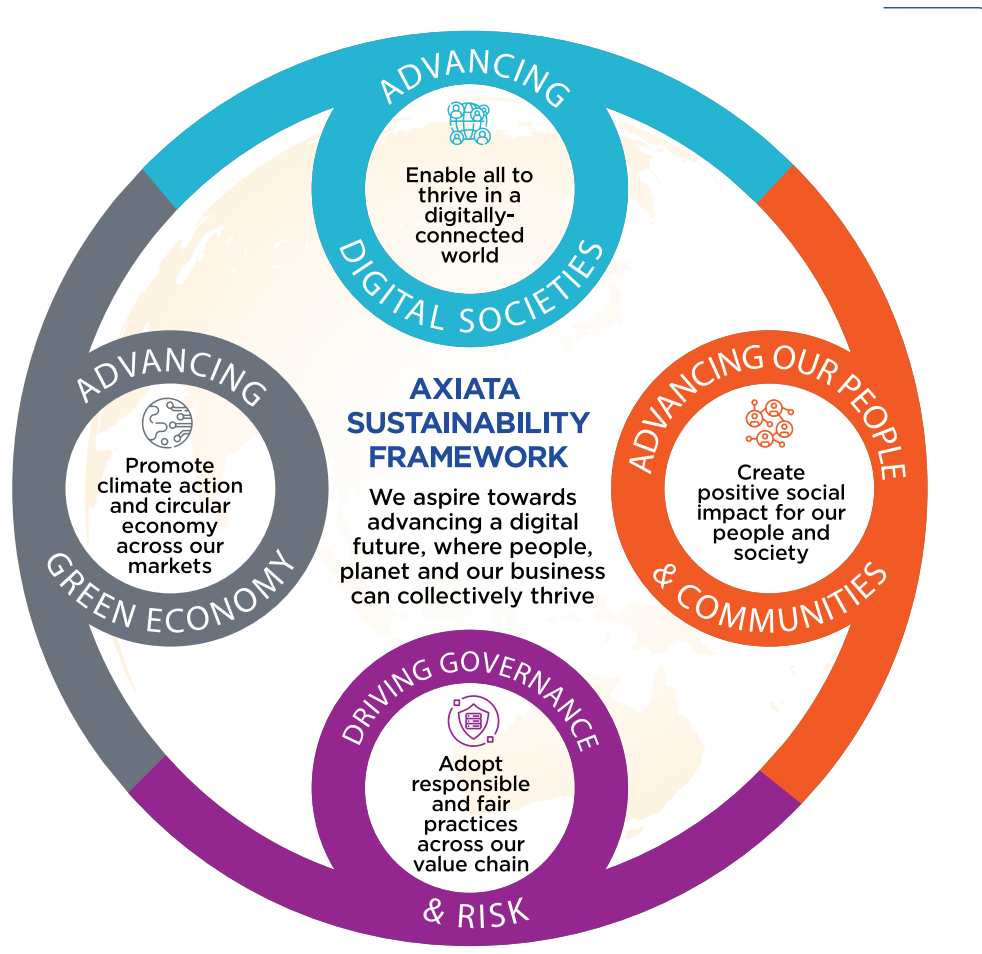
Axiata's Sustainability Framework underpins our commitment to sustainable and responsible business practices. It prioritises key ESG issues and acknowledges the evolving nature of sustainability across the Group. This framework ensures that our efforts align with global standards and stakeholder expectations to generate a positive impact on our business, the environment and society.

“Our Sustainability Framework provides the foundation for Axiata’s long-term success and directly supports our mission of Advancing Asia. It empowers us to create value, foster innovation and contribute to a more sustainable and inclusive future for the communities we serve.”

Vivek Sood

Group Chief Executive Officer and Managing Director

Our Sustainability Framework



<p>Advancing Digital Societies</p>	<p>Advancing Our People & Communities</p>	<p>Driving Governance & Risk</p>	<p>Advancing Green Economy</p>
<p>Enable all to thrive in a digitally connected world with a focus to improve the lives of people through technology whilst ensuring digital inclusion.</p> <ul style="list-style-type: none"> 4 Quality Education 8 Decent Work and Economic Growth 9 Industry, Innovation and Infrastructure 10 Reduced Inequalities 17 Partnerships for the Goals 	<p>Create positive social impact on our people (talent) and society. Internally, this links to our agenda for Fair, Diverse and Inclusive Employment.</p> <ul style="list-style-type: none"> 4 Quality Education 5 Gender Equality 8 Decent Work and Economic Growth 10 Reduced Inequalities 17 Partnerships for the Goals 	<p>Adopt responsible and fair practices across our value chain to build long-term digital trust and enhance cyber security and data protection.</p> <ul style="list-style-type: none"> 8 Decent Work and Economic Growth 12 Responsible Consumption and Production 16 Peace, Justice and Strong Institutions 17 Partnerships for the Goals 	<p>Promote climate action and circular economy across our markets. This links to our target to become net-zero no later than 2050.</p> <ul style="list-style-type: none"> 9 Industry, Innovation and Infrastructure 12 Responsible Consumption and Production 13 Climate Action 17 Partnerships for the Goals

Prioritised UN SDGs

- 4 Quality Education
- 5 Gender Equality
- 8 Decent Work and Economic Growth
- 9 Industry, Innovation and Infrastructure
- 10 Reduced Inequalities
- 12 Responsible Consumption and Production
- 13 Climate Action
- 16 Peace, Justice and Strong Institutions
- 17 Partnerships for the Goals

MEMBERSHIPS & ASSOCIATIONS

We stay ahead of industry trends by participating in memberships and associations that help us build valuable connections and exchange knowledge. Through engagement with leading industry bodies, we stay informed on regulatory developments and gain access to valuable resources, tools and specialised expertise. These platforms also foster peer engagement, enabling knowledge exchange and collaborative problem-solving that help strengthen the industry.

GSMA

As a Board member of the GSMA, **GSMA**[™] a global organisation dedicated to driving innovation in the mobile ecosystem for positive societal impact, we collaborate with industry players on regional initiatives to promote social and digital inclusivity through the following main initiatives:

Humanitarian Connectivity Charter

Improving humanitarian access and response during crises. 160 Mobile Network Operators across 112 countries, including Axiata, have pledged to minimise the impact of crises and save lives by enhancing access to communication and information.

Refer to website [here](#)

Climate Action Taskforce

Achieving net-zero carbon emissions by 2050 with over 75 operator groups worldwide. The Taskforce advocates for climate policy frameworks, shares best practices and conducts research on how mobile tech can mitigate and adapt to climate change.

Refer to website [here](#)

Connected Women Commitment Initiative

Closing the gender gap in mobile internet and mobile financing services to provide more opportunities for women. Mobile operators, with support from the Connected Women team, are working to increase female participation in their mobile internet and/or mobile money service customer base. Dialog and Robi have committed to this initiative.

Refer to website [here](#)

TM Forum

Since 2010, the Group has been a member of TM Forum, a collaborative alliance comprising over 850 global enterprises dedicated to dismantling technological and cultural barriers among digital service providers, technology suppliers, consultancies and systems integrators. In 2019, we affirmed our commitment to the Open API & Open Digital Architecture Manifesto.

Refer to website [here](#)



The CEO Action Network (CAN)

CAN is a closed-door peer-to-peer informal network of CEOs and board members focused on sustainability advocacy, capacity building, action and performance. With a dedicated Working Group, workstreams and active members driving tailored initiatives, CAN aims to catalyse its members toward shaping future-ready and ESG-integrated business models and ecosystems.

Axiata is one of the 75 members of CAN. We have also confirmed our active participation in its Policy Advocacy workstream.

Refer to website [here](#)



30% Club

The 30% Club Malaysian Chapter, of which Axiata, ADA, EDOTCO, and Boost are members, has successfully contributed to achieving 33% female representation on boards of the top 100 public-listed companies and 27.6% across all PLCs in Malaysia, as of 1 January 2025. Launched in 2015, this global campaign promotes diversity, equity, and inclusion (DEI), with a primary focus on gender parity at board and C-suite levels. It achieves this by mobilising Chairs and CEOs, engaging stakeholders, and fostering a pipeline of women leaders, supported by 74 Corporate Advocates.

Refer to website [here](#)



UN WEP

In 2022 we became a signatory to the United Nations Women's Empowerment Principles (WEP). We are committed to fostering an inclusive workplace environment that celebrates diversity, promotes gender equality and empowers women in the workplace, ensuring all employees have equal opportunities for growth and development.

Refer to website [here](#)



Business Integrity Alliance

As a member, we are actively engaged in collaborative efforts aimed at combatting corruption and promoting business integrity. We contribute to the Alliance's activities by hosting and participating in best practice sharing sessions, fostering connections among industry practitioners and advocating the use of data analysis and automation of compliance to ensure efficiency and accuracy of data. We also support various events focused on reducing the costs and risks associated with corruption in business.

Refer to website [here](#)



FIRST (Forum of Incident Response and Security Teams)

Axiata Group Berhad strengthens its incident response and cyber security resilience by becoming a member of FIRST in 2019. As a member, we benefit from knowledge sharing, global collaboration, timely threat alerts and connecting with incident response teams worldwide, fostering diverse perspectives and exposure to cyber security insights.

Refer to website [here](#)



CREST

We became a member of CREST and attained CREST accreditation in 2023. CREST is an international not-for-profit membership body representing the global cyber security industry. CREST accreditation represents companies that are recognised as offering the highest quality and most professional cyber security services. As a member, we have access to independent and verifiable quality assurance and the opportunities to influence governments and regulators through CREST engagements and policy inputs globally. We also benefit from regular networking and roundtable events.

Refer to website [here](#)



United Nations Global Compact

Axiata Group Berhad engaged with the UN Global Compact Network Malaysia & Brunei (UNGCMYB) in 2024 through the Sustainability & Reporting Suite Forum, where UNGC experts shared insights on SDG reporting and best practices. The Group also participated in the UNGC Climate Ambition Accelerator Programme, sharing its experience in obtaining Science-Based Targets initiative (SBTi) validation. UNGCMYB also facilitated OpCo introductions to Global Compact country networks. At the Sustainability Celebration Night 2024, Axiata was recognised as an SBTi Validator for successfully having its targets validated by SBTi.

Refer to website [here](#)



ADVANCING DIGITAL SOCIETIES

What This Means to Us

We see digitisation as a powerful force for progress, ensuring more people can connect, engage and thrive in the digital world. By expanding access to education, healthcare, commerce and entertainment, we empower more than 175¹ million customers across Asia to unlock new opportunities and improve their daily lives.

Material Matters

2 5 6 7 8

Prioritised UN SDGs



SUSTAINABLE BUSINESS GROWTH

Why Is This Important

Axiata's sustainable business growth is key to driving long-term value creation and resilience in an evolving digital and economic landscape. By embedding sustainability into our strategic investment decisions, we optimise our portfolio to generate both direct and indirect value while staying agile amid global economic uncertainties. This approach strengthens shareholder returns, enhances operational performance and ensures we continue delivering meaningful and lasting impact to our stakeholders.

Our Approach

Drive transformation with clear targets to enhance performance, accelerate value creation and strengthen long-term shareholder value. This includes reshaping our portfolio to unlock growth opportunities and build resilient, future-ready businesses. Guided by the Axiata 5*5 Strategy, we focus on five portfolio vectors that provide a structured approach to sustainable value creation.

Moving Forward

We remain committed to financial resilience by reducing debt, improving cash flow and strengthening our balance sheet for sustainable dividends. In prioritising core assets, we will focus on connectivity and convergence while selectively monetising assets to unlock value. The upcoming XL Axiata-Smartfren merger enhances scale and synergy, supporting long-term growth. We will also explore adjacent opportunities aligned with our core business.

[IAR](#), [Creating Value In 2024](#) on page 5, [In Conversation With Our GCEO](#) on pages 8 to 12, [Our Strategy](#) on page 22 and [Our Investor Proposition](#) on page 30

Our Progress

2024 Financial Achievements

~ RM1 billion in opex optimisation driven by operational excellence across HoldCo and OpCos, lifting EBIT² margin by approximately 4 percentage points.

~ RM2 billion in capex optimisation through a new governance model with Board Investment Committee, ensuring a disciplined focus on ROI.

RM0.9 billion PATAMI, driven by strong EBIT³ & ⁴ growth of 39.3% at constant currency, exceeding FY2024 Headline KPI

RM2.6 billion net debt reduction, strengthening the balance sheet as net debt/EBITDA improves to 2.7x² from 3.4x² in 2023.

~ RM1.3 billion in OpCo and key associate dividends, reinforcing dividend sustainability, with Axiata declaring a 10 sen DPS for 2024.

Notes: ¹ Includes digital telcos and digital businesses in footprint countries

² Exclude EDOTCO Myanmar

³ Headline KPIs exclude EDOTCO Myanmar

⁴ Headline KPIs exclude impairment of assets

ADVANCING DIGITAL SOCIETIES

NETWORK QUALITY & CONNECTIVITY

Why Is This Important

Reliable network quality and connectivity are central to Axiata's customer-centric growth strategy. Expanding coverage in rural and underserved areas, with advancements in 5G and IoT, ensures we meet evolving digital needs while driving economic growth. Optimising our network also improves cost structures, enhances energy efficiency, and reduces CO₂ emissions, supporting our net-zero ambitions. By continuously strengthening our network, we deliver exceptional customer experiences, build trust, and maintain competitiveness in a fast-evolving market.

Our Approach

Axiata prioritises network enhancements to deliver reliable, affordable, and resilient connectivity. Through our Network Transformation Programme, we drive 5G adoption, cloud core infrastructure, fibre expansion, and rural connectivity. We also leverage synergies from strategic mergers, while focusing on simplification, cost optimisation, and open network architectures to strengthen service quality. Our in-house talent plays a key role in developing advanced automation tools and supporting our Telco-TechCo journey.

Moving Forward

Axiata will continue implementing the A3 architecture, initially focusing on automated CI/CD/CT for cloudified network functions, network Digital Twin, RAN abstraction layer for automation, and AI-powered network operations. Expected benefits include opex reduction through automation, minimised capex via stable orchestration and an open ecosystem, vendor-inclusive innovation, faster time-to-market for 5G services.

Our Progress

Axiata made significant progress in enhancing network quality and connectivity through strategic initiatives focused on cost-efficient transformation, technological innovation, and improved service performance. Key efforts included optimising capital allocation, leveraging AI and automation, and improving network economics to drive better connectivity across its markets.

5G and Cloudification

- Cloud-native 5G Core (5GC) deployed to improve network scalability and flexibility
- 5G Commercial Models developed to enhance monetisation and market readiness
- Network Edge Monetisation initiatives introduced to optimise network's edge infrastructure for faster response time and new service offerings

AI and Autonomous Networks (A3 Strategy)

- Automation implemented to improve network operations and efficiency
- AI in Telecoms integrated for predictive maintenance, optimisation, and smarter network management
- Orchestration and Automation Framework developed to execute complex workflows

Open Systems

- Explored Open RAN deployment to increase vendor flexibility and improve interoperability
- Getting Back Control - introducing open automation framework to enhance network autonomy and reduce dependency on third-party systems

Legacy Sweat (Cost Optimisation)

- Value-Based Planning (VBP) implemented across affiliates to optimise capital allocation based on traffic, quality, and customer demand
- Huawei Core Network Hardware Optimisation (HUA CN HW opt.) executed to improve and assure network efficiency and performance
- Energy Savings Initiatives deployed, leading to measurable reductions in energy consumption
- RAN Quality & Optimisation efforts improved network performance and efficiency
- Transport/IPV6/SRV6 initiatives implemented to modernise network infrastructure
- Cost Reduction introduced to improve financial sustainability while maintaining service quality

Note: ¹ Includes digital telcos and digital businesses in footprint countries

ADVANCING DIGITAL SOCIETIES

Our Progress (cont'd)

The following shows our network coverage across our operating markets:

1

Country
Indonesia

No. of BTS
4G : 110,995

Nature of Business
Mobile, Home

Customers
59.8¹ million

Technology Deployed
Mobile : GSM, GPRS, EDGE, 3F, HSPA+, DC-HSPA+, 4G LTE, 4, 5G, e-SIM

Network Coverage
4G : 21,000 villages and 5,135 sub-districts spanning 475 cities and 6 regions

Scan the QR code to visit XL's website

2

Country
Sri Lanka

Nature of Business
Communication Services, Telecommunications Infrastructure Services, Media and Digital Services including Financial Services, Dialog Enterprise

Customers
21.7² million

Technology Deployed
Mobile : GSM/EDGE, LTE/LTE-A, 5G/5G-A Pilot, MCPTT, IOT, eSIM
Fixed Network : LTE, WIFI, DOCSIS, FTTx, Wibas. Cambium
Media : IPTV, DTH (Satellite TV), ViU mini (Android Stick), ViU Hub 2.0 (Android TV, VIU APP for Android and IOS)

No. of BTS
2G : 5,283
4G Mobile Broadband: 5,462
4G Home Broadband: 2,566

Network Coverage
(by population coverage)
2G : 98.9%
4G Mobile Broadband: 97.4%
4G Home Broadband: 71.9% (Outdoor Coverage)

Scan the QR code to visit Dialog's website

3

Country
Indonesia

Nature of Business
Internet Service Provider, Carrier Service Provider

Technology Deployed
Fixed-line Fibre Broadband

Network Coverage
(by population coverage)
~ 4 million home passes

Scan the QR code to visit Link Net's website

4

Country
Cambodia

Nature of Business
Mobile

Customers
7.5 million

Technology Deployed
Mobile : GSM/EDGE, LTE/LTE-A, e-SIM

No. of BTS
2G : 3,934
4G : 3,990

Network Coverage
(by population coverage)
2G : 99.5%
4G : 93.1%

Scan the QR code to visit Smart's website

5

Country
Bangladesh

Nature of Business
Mobile

Customers
56.7 million

No. of BTS
2G BTS : 17,848
4G BTS : 18,148

Technology Deployed
Mobile: GSM/EDGE, LTE/LTE-A, VoLTE, e-SIM

Network Coverage
(by population coverage)
2G : 99.83%
4G : 98.96%

Scan the QR code to visit Robi's website

6

Key Associate Company

Country
Malaysia

Nature of Business
Mobile, Home

Customers
20.4³ million

Technology Deployed
Mobile : GSM/GPRS/EDGE, LTE/LTE-A/VoLTE/ VoWiFi, 5G





Network Coverage
(by population coverage)
4G LTE : 97.5%
4G LTE+ : 94.4%

Scan the QR code to visit EDOTCO's website

Notes: ¹ Includes mobile and home customers
² Includes mobile, home and TV customers
³ Include EDOTCO Myanmar operations

ADVANCING DIGITAL SOCIETIES

Our Progress (cont'd)

OpCos	Connecting People & Enterprises Through Smart Innovation	Network Convergence, Digitisation and Automation	Network Resilience and Reliability
	<ul style="list-style-type: none"> The Dialog-Airtel merger enhanced connectivity, optimised costs, and improved user experience through better throughput, higher data traffic volume, and improved voice quality Provided advanced ICT services for Enterprises H One supported and enabled Enterprises' transformation journey to the cloud 	<ul style="list-style-type: none"> In-house Self-Organising Network (SON) reduced manual intervention in network management, enhancing network performance, improving customer experience, and lowering costs Developed in-house Radio Network Optimisation Tool, which improved spectral efficiency, expanded coverage, and provided greater visibility into network performance 	<ul style="list-style-type: none"> Developed in-house Anomaly Detection Solution, which enables automated identification of network anomalies, promptly addressing issues to minimise disruptions and enhance customer experience Implemented the India-Asia Expressway (IAX) submarine cable, strengthening network redundancy and resilience, improving international connectivity, reducing costs, and enhancing customer experience
	<ul style="list-style-type: none"> Smart successfully commissioned an additional 475 Base Transceiver Stations, pushing the total to 3,990 sites country-wide, enhancing the quality and reach of mobile connectivity for millions of Cambodians 	<ul style="list-style-type: none"> Digitised the acquisition journey for fixed and home consumers, including automating service provider selection for fibre, reducing connection request processing time from manual over a day to instant 	<ul style="list-style-type: none"> Ensured 99.50% network availability through proactive field operations, minimising downtime and maintaining service reliability Improved energy resilience by transitioning 99% of off-grid sites to solar and backup power, reducing dependency on external grids and ensuring uninterrupted service. Demonstrating its commitment to sustainability, approximately 40% of Smart Axiata's 4G base stations are equipped with solar energy as a complementary energy source to reduce their carbon footprint, aligning with Cambodia's climate goals for net-zero emissions by 2050
	<ul style="list-style-type: none"> Facilitated infrastructure sharing as an independent tower company, reducing the physical and carbon footprint of tower sites while optimising space and minimising environmental disruption Expanded digital connectivity in Malaysia by supporting the government in achieving 82% 5G and more than 97% 4G coverage of populated areas (CoPA), enabling approximately 33.1 million people to access high-speed networks and bridging the digital divide 		
	<ul style="list-style-type: none"> Strengthened infrastructure business and customer excellence by expanding network penetration through built-to-suit solutions and open access, ensuring greater connectivity and service reach 	<ul style="list-style-type: none"> Upgraded broadband infrastructure by converting Hybrid Fibre-Coaxial (HFC) home-passed areas to Fibre to the Home (FTTH) and implementing a nationwide home funnel, improving service quality and expanding network visibility for better penetration 	<ul style="list-style-type: none"> Strengthened network redundancy and resilience by integrating the JAYABAYA Submarine Cable into the JAVA BACKBONE Inland, reducing single points of failure and ensuring uninterrupted connectivity Enhanced service reliability with a 40% reduction in network outage risks through geographically distributed IP Core nodes, achieving 99.99% uptime for enterprise and residential users Expanded Java's backbone capacity by 20 Tbps, reducing latency by 30% for ISPs and hyperscalers

Within Axiata's operations, XL, Dialog, Robi, EDOTCO Bangladesh and Link Net have achieved ISO 9001:2015 Quality Management System certification, demonstrating their commitment to high service quality. This internationally recognised standard ensures our product and service distribution networks meet global quality benchmarks, reinforcing Axiata's focus on operational excellence and customer satisfaction.

ADVANCING DIGITAL SOCIETIES

CUSTOMER EXPERIENCE

Why Is This Important

With more than 175¹ million users across our markets, delivering a seamless and rewarding customer experience is essential to meet diverse consumer needs. A strong customer experience drives business value, directly influencing financial performance. By continuously enhancing service quality and responsiveness, we maximise economic value creation while reducing the risk of revenue loss.

Our Approach

We have a comprehensive Customer Experience (CX) framework that integrates digital and traditional touchpoints to deliver seamless, personalised experiences. Our Customer Charter ensures we capture valuable feedback through surveys at key interaction points, using metrics such as Relative Net Promoter Score (NPS), Customer Effort Score, Net Trust Score, and Customer Satisfaction Score to measure effectiveness. A robust CX governance model ensures consistency across OpCos. We continuously invest in AI-driven solutions, data analytics, and digital innovations to enhance responsiveness, security, and overall customer satisfaction.

Moving Forward

The future of customer experience will be AI-driven, proactive, and self-sustaining, reducing effort and enhancing real-time engagement. We will adopt an end-to-end approach to ensure seamless interactions across the entire customer journey. By adopting autonomous and predictive solutions, we anticipate needs, minimise friction, and enhance satisfaction. We aim to stay competitive through workforce transformation, AI-driven insights, and skill development. This holistic approach will enable us to strengthen market leadership, foster long-term loyalty, and drive sustainable growth in a digital-first economy.

Customer Experience

Voice of Customer, Customer Insight & Understanding

Customer Experience Strategy

Customer-Centric Culture

Organisational Adoption & Accountability

Metric, Measurement & Return on Investment

Experience Design, Improvement & Innovation

The Six Pillars of Great Customer Experience

Personalisation

Using individualised attention to drive emotional connection

Resolution

Turning a poor experience into a great one

Integrity

Being trustworthy and engendering trust

Time & Effort

Minimising customer effort and creating frictionless processes

Expectations

Managing, meeting and exceeding customer expectations

Empathy

Achieving an understanding of the customer's circumstances to drive deep rapport

To provide a distinctive experience for customers, an organisation must unite around the goal of meeting their true needs. Done well, the effort can power a vast amount of innovation

Aspiration

Achieve & maintain #1 position in CEX

DCEX Maturity L5

App Rating 4.5

Chatbot Maturity L4

The Six Core Competencies of Customer Experience, CXPA

Note: ¹ Includes digital telcos and digital businesses in footprint countries

ADVANCING DIGITAL SOCIETIES

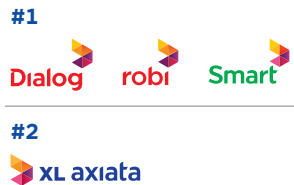
Our Progress

Customer Satisfaction

We continuously track customer satisfaction scores and KPIs across our operating companies to ensure we meet consumer needs. Annual CX benchmarks align with industry standards, with quarterly performance reviews driving improvements. By leveraging our networks, platforms, and services, many of our operating companies lead in customer experience metrics. We remain committed to sustaining this leadership and ensuring high customer satisfaction.

Measuring and Communicating Our Value

Net Promoter Score 2024



2023



Customer Satisfaction Performance (Digital Business)



Boost introduced Boba, an in-app AI chatbot for Boost eWallet, supporting English, Malay, and Chinese to handle common customer inquiries. Additionally, a self-service helpdesk for Boost PayFlex was launched to assist users, alongside customer experience training for the Customer Experience team. While Boba manages most eWallet and Boost Business queries, data on the PayFlex helpdesk is still limited due to its recent launch.



ADA's Conversational AI and NextGen CX platforms enabled real-time, data-driven interactions that improved satisfaction, engagement and brand loyalty.



ADL supported all Axiata OpCos with Axonect product portfolio, advanced skills, complex projects/ transformation executions, etc., which assisted OpCos to increase their customer experience. ADL achieved an average customer experience of 4.3 out of 5 in FY2024 for these strategic project engagements.

Enhancing Customer Experience

We remain committed to enhancing customer experience across all touchpoints. Hosting International Customer Experience Day for the second consecutive year enabled the cross-sharing of insights and best practices, further strengthening our dedication to customer-centric excellence.

OpCos	Efforts and Initiatives
	<ul style="list-style-type: none"> Implemented Service Interaction Assistant (SIA) across customer interaction centres and retail service points to enhance service quality, efficiency, and cost-effectiveness, with 20 customer journeys integrated and 15 more in progress Enhanced Dialog Club Vision by forming strategic partnerships with top corporates and merchants across travel, leisure, banking, and finance, enriching the loyalty programme for high-net-worth customers Upon acquisition, integrated Airtel Lanka's operations into Dialog Axiata's customer experience channels across retail, app, and chatbot platforms, ensuring a unified customer experience Achieved 99% customer interactions through Ecare, with a 10% increase in digital care engagement, driven by improvements in the MyDialog App, web platform, and DIA chatbot Introduced Sri Lanka's first AI-powered greeting cards, leveraging Star Points to offer customers a futuristic experience, and reached over 6 million users
	<ul style="list-style-type: none"> Expanded 60 MHz of 2600 band spectrum to strengthen service quality, with deployment in high-traffic areas of Robi and Airtel Established 100 Robi Sales and Service Points (RSSPs) to bring services closer to customers through both digital and physical touchpoints Achieved 52% YoY improvement in voice service experience Strengthened partnership with mobile financial service (MFS) players that led to greater convenience for customers and fostered digital financial inclusion Continued to lead the industry in data services with 16% faster data speeds compared to 2023 and enhanced video-streaming performance

ADVANCING DIGITAL SOCIETIES

OpCos

Efforts and Initiatives



- Launched the Smart DakLuy service, allowing prepaid customers to request top-ups from friends and family, ensuring continuous connectivity even when unable to top up their own account immediately
- Implemented eKYC across self-care channels, leveraging Facial Recognition technology, AI, and Machine Learning to enable secure and remote identity verification. These advanced technologies prevent identity theft and enhance accuracy in document verification while reducing in-person visits, improving accessibility, and ensuring regulatory compliance
- Opened 23 new Smart Express Shops ensuring Smart's presence across 21 provinces in Cambodia, thereby expanding service accessibility beyond major cities
- Enhanced flexibility for Smart eSIM by allowing customers to set up their eSIM using one QR code across different devices, giving a hassle-free experience for users who switch phones
- Launched a new Smart Axiata website with improved navigation, faster loading, and mobile optimisation, ensuring a seamless and user-friendly experience for customers
- The SmartNas app was upgraded with a simplified top-up process, gamification for better engagement, and eKYC integration for seamless onboarding and verification
- Automated retail operations with connected queue machines in Smart shops, enhancing service efficiency, customer experience, and reducing environmental impact
- Opened > 300 Shop-in-Shop locations across Cambodia, expanding service points through authorised dealers to offer key services like SIM changes, with future enhancements planned
- Introduced Customer Day, a quarterly initiative where employees engage directly with customers across Smart Shops and call centre, gathering insights to enhance service delivery and customer satisfaction
- Redesigned the customer self-service system with proactive announcements, segmented support for enterprises, home internet, and mobile users, and direct access to customer support for high-value customers

Customer Feedback and Complaints

Real-time customer feedback is captured at various OpCo touchpoints to improve interactions between users and digital platforms through a human-centric approach. Complaints, feedback, and requests are logged via self-care and assisted care channels, categorised by priority, and addressed within set Service Level Agreements (SLAs) to enhance customer experience. Certain OpCos, such as Dialog and Robi, allow customers to track complaint resolutions.

Addressing Customer Concerns

Providing safe, accessible, and user-friendly services is a commitment our OpCos take seriously. By actively listening to customers and identifying areas for improvement, we address potential gaps in product and service delivery. We continuously strive to resolve issues and enhance customer satisfaction. Below are key concerns raised by customers and the actions taken to address them.

OpCos

Customer-Centric Initiatives & Improvements



- Ensured timely resolution of service issues by establishing a complaint centre with a quick response system, internal escalation process, and compensation for inconvenience
- Strengthened data security and compliance through regular evaluations, confirming no non-compliance or customer data privacy infringements in 2024
- Enhanced customer communication and transparency by expanding service channels, including a call centre, Customer Experience & Service Operation Centre, and regular updates



- Improved complaint resolution transparency by integrating all customer touchpoints into a centralised system, enabling real-time tracking via the MyDialog App
- Enhanced service alignment with customer needs by leveraging sentiment analysis, Customer Social Profiling, and AI-driven analytics to track behaviour and engagement for proactive improvements



- Achieved the top Customer Service Net Promoter Score in Q4 2024 and highest Digital Reputation Score within the industry
- Increased composite and digital touchpoints Customer Satisfaction Score

ADVANCING DIGITAL SOCIETIES








DIGITAL INCLUSION

Why Is This Important

As the digital landscape expands, many individuals remain excluded due to barriers in access, affordability, and digital readiness. Operating in Southeast and South Asia emerging markets, we are committed to bridging this digital divide by enhancing connectivity, the foundation of digital inclusion, and empowering communities with the tools to participate in the digital economy. As AI continues to transform industries, ensuring inclusive digital access, especially for underserved and marginalised communities, is key to unlocking economic opportunities and building a more equitable and connected future for all.

Our Approach

Through collaboration with governments, partners, and stakeholders, we enable individuals to participate in the digital economy. Our approach is anchored on four key pillars: expanding inclusive access, equipping communities with digital skills, fostering innovation for social impact, and ensuring the safe and responsible use of technology, as outlined in the table below.

Inclusive Access 	Training for Digital skills 	Innovation & Inclusive Services 	Safe & Responsible Use of Technology 
Ensuring everyone has access to broadband communication in urban and rural areas, especially schools, as well as access to learning content and healthcare. <ul style="list-style-type: none"> Connectivity Access to Vital Services 	Providing the basis for digital literacy, intermediate skills on the use of productivity and digital marketing tools to advance employable skills for future professions. <ul style="list-style-type: none"> Digital Skills 	Powering innovation in local ecosystems through our digital innovation funds, digital financial inclusion and digital services for business, and improving the lives of marginalised communities through technology, especially women and girls. <ul style="list-style-type: none"> Innovation for Social Impact Digital Financial Inclusion Digital Services for Business Empowering Marginalised Communities 	Mitigating harm by protecting users and promoting the responsible use of technology. <ul style="list-style-type: none"> Mitigating Harm & Responsible Use 

Target Segments: Segments targeted include Lower Income Groups, Women and Girls, Seniors Individuals, Rural Communities, Individuals with Disabilities and Individuals with Lower Levels of Education.

Moving Forward

The outlook for improving digital accessibility and inclusion amid AI advancements is promising but demands sustained effort. By 2025, increased investments in digital infrastructure will focus on expanding broadband connectivity and mobile networks, particularly in underserved and rural areas, enabling broader access to AI-driven services. AI's potential to enhance productivity, automate tasks, and improve decision-making will drive growth in key sectors such as healthcare, agriculture, and finance. However, access to these technologies remains a challenge, making workforce upskilling and reskilling critical to ensuring AI benefits all, including marginalised communities. Ethical AI development, grounded in fairness, accountability, and transparency, will be essential in shaping inclusive and responsible AI adoption.

Our Progress

Digital Inclusion Benchmark

The Digital Inclusion Benchmark (DIB), conducted by the World Benchmarking Alliance (WBA), evaluates the top 200 technology and communications companies worldwide on their role in fostering a more inclusive digital ecosystem and advancing the Sustainable Development Goals (SDGs). In 2023, we maintained our position in the top quartile for the fourth consecutive year, ranking 22nd out of 200 companies—a reflection of our sustained commitment to digital accessibility and inclusion.





In 2024, the WBA paused the DIB assessment to refine its methodology, with evaluations set to resume in 2025. Going forward, companies will be assessed biennially across six key areas: access, skills, use, innovation, sustainable value creation, and social impact. As we move ahead, we remain committed to strengthening our digital inclusion efforts and driving meaningful impact in the communities we serve.

EDISON Alliance

Through the EDISON Alliance's 1 Billion Lives Challenge, we are committed to improving 23 million lives across Asia between 2022 and 2025, focusing on healthcare, education, and financial inclusion, including digital skills. Our initiatives, implemented through XL, Dialog, Smart, Robi, and Boost, have made a tangible impact, reaching nearly 26.8 million people as of the end of 2024.




 **6.7 million** people benefitted from Education initiatives

 **19.2 million** people benefitted from Healthcare initiatives


 **~ 880,000** people benefitted from Financial Services initiatives


ADVANCING DIGITAL SOCIETIES

Our Progress (cont'd)


-  **Sisternet (Women SME)** - Sisternet empowers Indonesian women-led MSMEs to grow and thrive. With new features and integration into XL product apps, Sisternet will continue supporting over 1 million women in 2025, making access and benefits more seamless
- Gerakan Donasi Kota (Quota Donation Movement)** - Enables customers to donate internet data for educational institutions and supports digital skills training for schools and students
- Laut Nusantara (Fishermen)** - Provides fishermen with a digital app for fish location tracking and digital marketing tools to enhance sales of marine products

 [IAR](#), Empowering Marginalised Communities on page 60

-  **Nenasa Site & App, e-Thaksalawa, and Learn Platform (University Students)** - Data-free access to educational and edutainment materials provided by the Ministry of Education
- Nenasa TV (School Students)** - Free satellite TV channels offering educational and edutainment content
- Nenasa Smart School (Teachers)** - Capacity-building initiative providing digital tools and training to educators to drive digital adoption in education

-  **Health Plus Service** - Robi-branded 360-degree healthcare solution offering telehealth consultations, disease advisory and appointment bookings for customers

-  **Digital Literacy Programme** - In-person workshops for high school students and supporting digital literacy guidebooks (print and digital), developed in partnership with key ministries and TikTok
- Mekong Farm App** - A platform connecting farmers across the region to share experiences, access tailored content, and enhance collaboration in agriculture

-  **Boost Merchant accounts (SME)** - Expanding digital financial services to underserved MSMEs, including retail businesses in the B40 segment and below
- Boost Wallet accounts (B40)** - Integrating unbanked B40 communities into Digital Financial Services and facilitating aid distribution

Inclusive Access

We work with our Digital Telcos to expand network infrastructure, ensuring broadband access for rural communities and educational institutions. By leveraging digital tools and technology, we enhance access to healthcare and education, benefiting students, remote areas, and the wider population.

Connectivity

Our efforts in connectivity ensure that underserved communities, including those in rural areas, have reliable access to digital infrastructure, enabling them to participate in the digital economy and essential services.



Gerakan Donasi Kuota

This initiative enhances connectivity in Indonesia by crowdsourcing internet donations for underserved schools and strengthening digital literacy.

Impact in 2024

Connected **214** schools

Provided ~ **250 TB** of data

Benefited **67,371** students and teachers

Users contributed 23.7 TB via 101,116 transactions on myXL and AXISNET, while XL added 227.8 TB and distributed 214 internet packages. Offline events in Cimahi, Bekasi and Belitung further supported schools through literacy training sessions.



DeafTawk

Provides accessibility for hearing-impaired individuals in Sri Lanka by offering real-time sign language interpretation services through a mobile application. The platform connects users with qualified interpreters via video calls and is available at Dialog Customer Care Centres, enabling deaf customers to interact with service representatives efficiently. Supporting Sinhala, Tamil, and English sign languages, the app offers a trilingual experience for greater inclusivity.

Impact in 2024

1,000 users connected with DeafTawk

Ensuring accessibility for deaf customers across all Dialog Customer Care Centers with DeafTawk

Launched a B2B model enabling organisations to make their services accessible to all deaf customers

Access to Vital Services

We enhance access to education and healthcare through digital tools and platforms. Digital advancements expand the reach of essential services, including telemedicine and digital healthcare solutions, improving accessibility beyond traditional methods.



Expanding Digital Access to Vital Healthcare Services

Collaborated with Alita Praya Mitra to launch JAGATARA (Jiwa Raga Sehat Sejahtera) to enhance digital healthcare access and support early stroke detection. This initiative integrates smart wearable technology with real-time health monitoring, allowing users to track blood pressure, heart rate, oxygen levels, and physical activity via smartwatches connected to the JAGATARA mobile app. By providing at-risk patients with immediate health insights and linking them to essential healthcare services, JAGATARA improves public health accessibility.

Impact in 2024

450 units deployed at Jati Padang Regional Hospital, South Jakarta

ADVANCING DIGITAL SOCIETIES

Our Progress (cont'd)



Expanding Digital Access to Education in Sri Lanka

Broadening digital education access through Nenasa TV, a dedicated educational channel aligned with the Sri Lankan national curriculum, offering subject-specific lessons, interactive content, and teacher-led demonstrations. Through its television platform and online resources, Dialog provides students with high-quality learning materials while also training educators to enhance digital literacy and teaching skills. The Nenasa Smart Schools initiative further strengthens digital learning by equipping schools with essential infrastructure and resources, ensuring wider access to quality education.

Impact in 2024

Nenasa TV reached **1.7 million** households

Providing Scholarships to Empower Students

Dialog supports high-achieving students through the Merit Scholarship Programme, offering financial assistance for those excelling in G.C.E. Ordinary Level and Advanced Level examinations to pursue higher education.

Impact in 2024

103 students received Merit Scholarship

Transforming Healthcare Access with Digital Health Solutions

Dialog's subsidiary, Digital Health, enhances healthcare accessibility in Sri Lanka with innovative digital solutions. Its flagship platform, Doc990, connects users with > 5,000 doctors, enabling doctor appointments, virtual consultations, and access to pharmacies and laboratories. The platform also offers AI-powered health scans, allowing users to monitor vital indicators such as blood pressure, heart rate, and stress levels via smartphones. The Wellness Marketplace provides medical packages, including health check-ups, home care, and cosmetic treatments from leading hospitals.

Impact in 2024

3 million users were connected across **260 hospitals** which is a **8%** growth YoY

10,000 users used vital healthcare indicators to monitor their health



Promoting Digital Education through Products and Services

We promote digital learning by offering affordable, tailored products and services that enhance access to educational content. Through the SmartNas app, students can subscribe to study plans on the Educational Broadcasting Cambodia (EBC) and Onesala platforms at a 60% discount to standard packages via the app's Digital Learning Add-Ons feature.

Meanwhile, the Smart Laor! Rean Monthly plan offers unlimited access to EBC's platform, removing concerns over data usage. In 2024, our partnership with EBC further expanded access by providing Smart Laor! users with 1GB of free daily data and introducing cost-effective bundles such as Digital Learning Add-Ons. These initiatives harness Smart's infrastructure to help close the education gap, enabling students to access online learning anytime, anywhere.

Impact in 2024

Launched at Hun Sen Serey Pheap High School to benefit **5,000** students

1GB free daily internet for students registered on the EBC website, accessible through SmartNas, utilised by average of **1,508** students daily

> 12,000 subscribers are utilising Digital Learning Add-Ons and Smart Laor! Rean Monthly

Training for Digital Skills

As technology evolves, Axiata equips local communities, students, and MSMEs with the digital skills needed to thrive in a digital economy. Our training and capacity-building initiatives focus on bridging the skills gap, with a strong commitment to empowering women and rural populations facing literacy challenges.



Ideamart

Ideamart equips developers with the skills and tools needed to create innovative applications. Developer training programmes provide hands-on experience with the Ideamart platform and APIs. Workshops and seminars raise awareness of digital technologies, while hackathons and competitions offer developers a platform to showcase skills and collaborate. These initiatives drive digital innovation and entrepreneurship across our markets.

Impact in 2024

Developer training programme benefitted **150** participants

12 events, including workshops and seminars, conducted

12 partnerships forged to run Hackathons and competitions



Strengthened University Engagements

bdapps deepened collaboration with the academic sector by signing Memorandum of Understanding (MoUs) with leading institutions to foster innovation and industry-academic knowledge exchange. These partnerships enabled curated workshops, sessions, and student engagement programmes focused on mobile app development and digital entrepreneurship.

Impact in 2024

MoUs signed with CUET and BRAC University Computer Club (BUCC)

Enabled university-level workshops and engagement sessions

Strengthened industry-academic collaboration in digital innovation

ADVANCING DIGITAL SOCIETIES

Our Progress (cont'd)



Expanding Education Access Through BEEP

The Basic Education Equivalency Programme (BEEP), led by UNESCO in collaboration with Cambodia's Ministry of Education, Youth and Sport (MoEYS) and Ministry of Labour and Vocational Training (MLVT), provides alternative education and skills training for out-of-school youth. Through 32 learning centres across 17 provinces, BEEP offers internet connectivity and digital devices, ensuring flexible learning pathways and access to technical and vocational education and training (TVET). Since 2019, the programme has benefited 3,338 learners, with 1,017 enrolled in 2024 and 482 graduates. Out of 482 graduates, 138 of them have enrolled in formal TVET, and 96 continued to obtain formal employment.

With a total investment of USD256,110 since inception, BEEP remains a key driver of digital education access in Cambodia, supporting the government's goal of enrolling 300,000 youth annually in TVET programmes.

Impact in 2024

200 smartphones and 50 tablets provided to learners	Internet services supplied to 10 BEEP centres	Data access for 141 learners	1,017 learners benefitted through BEEP
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Empowering Cambodia's Youth Through Digital Literacy

Smart collaborated with Cambodia's Ministry of Education, Youth and Sports, the Ministry of Post and Telecommunications, and TikTok, to advance digital literacy among high school students in four key provinces. The initiative, aligned with Cambodia's Digital and Society Policy Framework 2021-2035, equipped students with essential digital skills, responsible online behaviour, and video editing knowledge. Under the Train-the-Trainer programme volunteer students and Smart employees were trained as facilitators, with select participants from target provinces chosen to lead workshops to extend the programme's reach.

Impact in 2024

1,129 students equipped with fundamental digital skills	51 trainers, including Smart employees and volunteer students, trained under the Train-the-Trainer programme
12 students selected from target provinces to lead workshops	85 short educational videos created

BarCamp Battambang 2024

Smart, in partnership with the Cambodia Academy of Digital Technology (CADT), supported BarCamp Battambang 2024 to provide youth in Battambang and surrounding provinces with greater access to technology and entrepreneurship education. The event connected students with industry leaders, fostering digital literacy, career exploration, and innovation in rural communities.

Impact in 2024

2,000 students from 11 schools and universities participated	37 expert speakers shared insights on technology and entrepreneurship	15 exhibitors showcased digital innovations and opportunities
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Virtual AI Event: Strategic AI Implementation

Organised a Strategic AI Implementation event for 25 middle and top management employees, focusing on AI integration and strategic decision-making. This session provided insights into leveraging AI for business growth, enhancing digital capabilities across the organisation.

Innovation and Inclusive Services



Axiata provides funding and support to local startups and entrepreneurs, helping to scale innovative solutions that drive economic and social progress. Through strategic investments and training, we empower businesses to develop impactful technologies that address key challenges. In parallel, we focus on innovation for social impact, creating digital solutions that foster financial inclusion, enhance agricultural productivity, and improve accessibility. Our efforts aim to bridge the digital divide, empower women, and ensure that technology benefits all, driving sustainable growth and positive change across communities.

Digital Innovation Funds

	Digital Funds	2024 Highlights
	Axiata Digital Innovation Fund (ADIF) Total Investees: 17 (5 exits)	Provided 1,372 jobs and served 1.5 million SMEs, aligning with SDG 8 which aims to promote decent work and economic growth. 29% of ADIF investees are founded by women, with 5 companies led by women, which is in line with SDG 5: Gender Equality. Also, 53% of these companies are Bumiputera companies.
	Dialog Innovation Fund (DADIF) Total Investees: 8	Exploring options to exit from mature investments and invested in a cyber security company.
	r-ventures Total Investees: 15	Maintained its BDT132 million investment in 15 Bangladeshi start-ups with no new investments in 2024.
	Smart Axiata Digital Innovation Fund (SADIF) Total Investees: 4	SADIF exited one of its investments through a merger with a regional tech firm, while its remaining investees continue to expand access to clean, affordable energy and improve financial inclusion in underserved areas.

ADVANCING DIGITAL SOCIETIES

Our Progress (cont'd)

Innovation for Social Impact



Mekong Farm App

Supporting the Mekong Farm App, a digital platform that equips Cambodian farmers with expert farming content, an interactive community forum, and weather forecasts to enhance productivity and resilience. In 2024, Smart collaborated with Greenovator to expand the app's reach by deploying SMS alerts and guiding farmers on its usage.

Impact in 2024

1,034 registered users | **328** discussions engaged in the Q&A section | **1,461** views on farming guidelines

Digital Financial Inclusion

Axiata's digital financial services bridge the digital divide by expanding financial inclusion, equipping communities with the tools to participate in the digital economy and enhance their livelihoods.



Ideamart for Women

Ideamart for Women conducted workshops and seminars to raise awareness about digital technologies and financial inclusion, providing participants with essential knowledge and follow-up support. These sessions empowered individuals with the skills needed to navigate digital financial services and explore opportunities in the digital economy.

Impact in 2024

100 participants engaged | **6** events conducted



Robishop Device Financing

Introduced Bangladesh's first telco-led 'Buy Now Pay Later' (BNPL) facility in partnership with bKash, allowing unbanked mobile financial service users to finance smartphone purchases via Robishop.

Impact in 2024

First telco in Bangladesh to launch BNPL via MFS | Enabled access to devices for unbanked users

Digital Services for Businesses and Entrepreneurs

Axiata provides tailored digital solutions for businesses and entrepreneurs, equipping them with the tools and platforms needed to enhance operations, drive innovation, and expand their digital capabilities in their businesses.

For Businesses



API Platform

Ideamart offers a robust API platform that allows businesses to integrate digital services such as SMS messaging, payment gateways, and location-based services into their operations.

In 2024, Ideamart strengthened its API ecosystem by onboarding CAMARA standards for enhanced interoperability



Enterprise Solutions

Enterprise Marketplace offers customised digital solutions for businesses and micro SMEs in Sri Lanka, facilitating their digital transformation in the most efficient and cost-effective way.

In 2024, **over 7,000** Enterprises and SMEs have been offered and onboarded with new digital tools

For Individuals and Entrepreneurs

Low-Code/No-Code Platforms

Platforms like AppMaker empower individuals with limited or no coding experience to create mobile applications, making digital entrepreneurship more accessible.

5,200 service providers | **743** published apps | **2** training sessions

Monetisation Opportunities

Ideamart enables developers and entrepreneurs to generate revenue from their digital products by offering monetisation tools within its platform.

Total **743** monetised applications launched in 2024

Training and Capacity Building

Through workshops, hackathons and training programmes, Ideamart equips individuals with the necessary digital skills to succeed in the digital economy.

150 participants in developer training programmes | **12** workshops and seminars | **12** partnerships in hackathons and competitions



Empowerment through bdapps

Strengthened digital empowerment through bdapps by engaging youth and underrepresented communities in mobile app development to broaden inclusion and income opportunities.

bdapps Campus Ambassador and She Squad initiatives continued | bdapps She Squad mentored **1,750 female developers** through 65 leaders, driving high-impact, revenue-generating projects

bdapps Connect 2024

Organised annual bdapps Connect: Engage & Innovate event, which brought together the top developer community for an energising day of collaboration, games, and idea generation.

Engaged with **top 50 developers** | Innovation challenges and networking activities conducted

ADVANCING DIGITAL SOCIETIES

Our Progress (cont'd)



Developing the eSports and Entertainment Ecosystem

Mobile Mania 2024

Airtel (Robi) organised Bangladesh's largest mobile e-sports event with a significant prize pool, a live audience, and a fusion of gaming, music, and digital community engagement.

> 1,700 participants and > 3,000 live audience | BDT30 lakh prize pool

Hotath – Pop-up Concert Series

Introduced 'Hotath', a surprise-format concert series held at youth hangout spots across Dhaka, strengthening cultural connection with the urban youth.

Pop-up concerts held at public locations | Over 20,000 attendees reached



Supporting Businesses with Digital Services

On top of the connectivity solutions Smart offers, digital solutions help businesses enhance efficiency, improve security, and adapt to evolving technological demands. By offering ICT services tailored to both large enterprises and SMEs, Smart enables businesses to optimise their operations and better manage resources.

Cyber Security & Mobile Device Management (MDM)

With increasing cyber threats, securing business data is critical. Smart supports enterprises with cyber security and mobile device management solutions that protect digital assets, customer data, and business performance insights, reducing security risks.

Analytics for Business Insights

Access to data-driven insights helps businesses refine their strategies. Smart provides analytics tools that assist enterprises in identifying the right market demographics and optimising resource allocation for better decision-making.

Smart CheckinMe for Workforce Management

Managing workforce productivity is essential for SMEs. Smart CheckinMe enables business owners to track employee attendance and performance remotely, streamlining operations and improving reporting processes.

Empowering Marginalised Communities

Our inclusive digital initiatives empower women and differently-abled individuals across diverse backgrounds to enhance their digital skills and presence online.



Indigenous Communities

Collaboration with Indigenous Community of North Bengal

bdapps extended its outreach to indigenous youth through a dedicated workshop held at Saint Paul's High School in Naogaon. With support from Chandpukur Mission, the event introduced participants from the Santal, Oraon, and other communities to mobile app development and freelancing opportunities via the bdapps platform.

Impact in 2024

Workshop held in Naogaon with support from Chandpukur Mission | 30 participants from Santal, Oraon, and other indigenous communities | Exposed youth to app development and digital income opportunities



Women and Girls

Sisternet

Sisternet provides an inclusive digital ecosystem that enhances women's digital skills, entrepreneurship, and leadership through initiatives such as Shelnspire, Female Future Leader, and Sister e-Learning. By collaborating with 40+ strategic partners, the programme equips women with the tools to scale their businesses, improve financial literacy, and expand digital marketing reach, contributing to sustainable economic growth.

Impact in 2024

1,029,139 women benefited | > 177,890 hours of educational sessions conducted | > 4,000 womenpreneurs received direct business support | 13% increase in business revenue

75% expansion in digital marketing reach | 30% Boost product production | Internationally recognised by G20, W20, and UN Women for impact in closing the gender gap



Project Nisa

bdapps launched Project Nisa in 2024 to bridge the digital divide for female madrasa students by equipping them with essential digital and entrepreneurial skills, enabling them to take their first steps toward financial independence.

Impact in 2024

> 80 female madrasa students trained | Skills covered Microsoft Office, digital literacy and app monetisation | Light apps developed and launched on bdapps platform



Technovation Girls Cambodia 2024

Provided female students from 12 provinces with hands-on training in coding, entrepreneurship, and artificial intelligence through a 12-week programme. The initiative encouraged young women to develop innovative tech solutions, successfully submitting their projects on the global stage. The programme culminated in a National Event where finalists presented their projects.

Impact in 2024

622 female students trained in technology and entrepreneurship | 57 teams (237 students) submitted projects globally

4 winners recognised across key categories (one winning team awarded a study trip to Singapore) | 12 finalist teams showcased their work at the National Event

ADVANCING DIGITAL SOCIETIES

Our Progress (cont'd)

People with Disabilities



Digital Competency Training

Provided digital skills training that enhances job readiness and confidence in using digital platforms. The programme equips participants with self-assessment, digital workspace management, audiovisual documentation, and social media publishing skills, ensuring equal access to professional growth opportunities.

Impact in 2024

20 participants attended two-day training in Surabaya

Disability Internship Programme supported **19** deaf and speech-impaired interns at XL's headquarters and regional offices in Medan, Surabaya, and Bandung.

Strengthened employability through hands-on corporate experience

Promoted inclusive digital literacy aligned with Diversity, Equity, and Inclusivity (DEI) principles



Enhancing Inclusion for Persons with Disabilities (PWD)

- Introduced inclusive services, assistive technologies, and employment initiatives for PWDs
- Fully implemented disability design standards across its corporate website, application and training materials since December 2023, providing seamless experience for visually impaired and differently-abled users
- Implemented PWD employment disclosures since October 2023, reinforcing workplace inclusivity



Batik Beyond Sight

In partnership with Yayasan Cinta Anak Bangsa (Y CAB), Batik Beyond Sight provides training and mentorship for 12 visually impaired participants over a 12-month period. Supported by Link Net's Empowerment Fund, the initiative also funds the renewal and repair of Batik tools at Rumah Belajar Batik Bojong Bata, ensuring a more effective learning environment for participants.

Impact in 2024

~ **IDR100 million** allocated for training and mentorship

12 visually impaired participants trained in Batik craftsmanship

Safe and Responsible Use of Technology

Axiata actively promotes a secure and responsible digital environment by advocating for the safe use of technology. Through proactive measures, we work to protect users from cyber risks, including Child Sexual Abuse Material (CSAM), cyberbullying, and other online threats, ensuring a safer digital space for all.



Axiata Cyber Fusion Centre

Launched the Axiata Cyber Fusion Centre (ACFC) to help businesses protect their technology and customer data from cyber threats. The service provides threat penetration testing, vulnerability assessments, and network monitoring, ensuring robust security measures for organisations of all sizes and industries. ACFC also adheres to ISO 27001 data security standards.

MoU on Child Online Protection with APLE Cambodia

Partnered with Action Pour Les Enfants (APLE) to strengthen child online protection. This initiative includes establishing a reporting link on Smart's website and equipping children with the knowledge and tools to navigate the internet safely.

Promoting Digital Safety and Child Protection

Equipped parents and caregivers with the knowledge to safeguard children from online threats through targeted awareness campaigns. These initiatives highlight the prohibition of explicit content, promote responsible digital behaviour and reinforce the legal and ethical responsibilities of all online users. We advocate for child rights and labour law protections, ensuring children are shielded from digital exploitation and supported in their education and development. In partnership with the Telecommunication Regulator of Cambodia (TRC), this initiative has reached 91.3 million users, including children, parents and educators.

ADVANCING DIGITAL SOCIETIES

DIGITISATION AND INNOVATION

Why Is This Important

The rapid advancement of cloud technology, AI, IoT, 5G, and Edge Computing is transforming industries, enhancing efficiency, and reshaping customer experiences. As we strive to become a converged connectivity player, we prioritise digitisation, innovation, and analytics to drive operational excellence and maintain a competitive edge. These technologies enable automation, data-driven decision-making, and seamless connectivity, benefiting businesses and society by advancing smart cities, healthcare, and digital inclusion. At the same time, evolving cyber threats require proactive security measures to safeguard digital transformation efforts.

Our Approach




We are advancing our transformation into a Telco-TechCo, integrating AI, digital services, and enhanced connectivity to solidify its position as an Emerging Asian connectivity leader. Our approach includes implementing 5G Fixed Wireless Access (FWA) for expanded connectivity, Open Gateway APIs to drive digital integration, and the commercialisation of the Cyberfusion Centre to strengthen cyber security.


Moving Forward

Cloud computing, AI, IoT, and edge computing will continue to reshape industries, enhancing efficiency, automation, and connectivity. Businesses must adopt these technologies to stay competitive while addressing data security, regulation, and digital inclusion. Collaboration across sectors will be crucial to ensuring equitable access, unlocking economic opportunities, and driving smarter, more connected experiences.


Our Progress


IT Transformation


-  Upgraded the EasyLoad recharge solution with virtualised architecture and open databases for better scalability and cost-effectiveness
- Launched RobiWifi Fixed Wireless Access (FWA), offering multiple speed options and free OTT subscriptions
- Launched GenAI chatbots on websites and communication platforms for Robi and Airtel, enabling human-like interactions across various digital channels.


 Modernising outdated platforms with containerised architecture and new features to enhance efficiency. Key upgrades include a digital CRM with IoT, SME, Multi-SIM, and machine learning, an enterprise CRM with self-service, and eKYC integration across all touchpoints. IVR/USSD platforms are being upgraded for full redundancy. The campaign platform is improving for real-time marketing and Vector DB is being introduced for face search and fraud detection.

Talent Factory

 **Group Risk & Compliance Awareness (GRCA) Training**
The GRCA Training is part of Axiata Mandatory Compliance Training (AMCT), covering data privacy, cyber security, risk management, ethics, and whistleblowing to ensure adherence to compliance standards. In 2024, the training was standardised across the Group and rolled out to all employees.

 **Smart Digital Internship Programme**
The Smart Digital Internship Programme provides students with hands-on experience and digital skills development through 5 cohorts with around 90 participants. Designed to align with academic studies, interns gain real-world exposure, work on industry-relevant projects, and collaborate in team activities. Several participants have since joined Smart, contributing to digital communities and strengthening Cambodia's digital workforce.

 **Leadership Academy**
The Link Net Leadership Academy is a six-month AI-powered leadership development programme designed to equip employees with the skills needed to lead effectively. It offers structured learning across three levels: Effective Stewardship (Non-Executive to Executive), Leadership Development (Junior Management), and Managerial Development (Middle Management). In 2024, 71 employees participated, completing 3,018 learning hours, with tailored training to enhance leadership capabilities and drive organisational growth.

 **Building Technical Excellence in Data and AI**
ADA invests in deepening technical AI skills through targeted certifications in data analytics, ML and AI. Employees undergo rigorous training via strategic partnerships with leading platforms such as Databricks, Snowflake, and AWS to ensure mastery of industry-standard tools. This is complemented by business and sales-focused accreditations that strengthen cross-functional expertise and support data-driven client delivery.

ADVANCING DIGITAL SOCIETIES

Our Progress (cont'd)

Enterprise Solutions for Sustainable Development

The Group's continuous digitisation initiative includes enhancing enterprise solutions to support digital transformation for clients across various industry verticals. Our OpCo enterprise teams, together with Axiata Enterprise, aim to empower businesses into embracing technological advancements in the areas of cloud migration, security services, managed connectivity and SME-based solutions.

Contributing to Nation Building Process	Empowering Business Through Digitisation	Supporting Our Communities
<p>Digital SME Strengthening the SME sector with digital adoption and allowing SMEs to grow their businesses vertically and horizontally. Multi-mode connectivity solutions and hosted pay as you grow payments schemes accelerates the adaptation. SME productivity tools enhances business productivity, leading to an overall increase in GDP.</p>	<p>Empowering businesses through digitisation by providing seamless connectivity, robust infrastructure, and end-to-end technology solutions. We integrate advanced communication networks, cloud services, and cyber security frameworks to enhance operational efficiency and customer experience. By streamlining IT systems and automating processes, we enable businesses to scale, innovate, and adapt quickly to market changes. Our expertise bridges legacy systems with modern technologies like IoT, AI, fostering agility and data-driven decision-making. Ultimately, we act as strategic partners in the digital transformation journey of our customers, helping organisations unlock new revenue streams, improve productivity and efficiency to stay competitive in an increasingly digital world.</p>	<p>Supporting communities by enhancing digital access, enabling remote education and healthcare, fostering local innovation, creating jobs, and developing capability within communities. Through smart infrastructure and inclusive connectivity, we drive social development, bridge the digital divide, and empower communities to thrive in a connected, digital-first world.</p>
<p>Secure Connectivity Secures national connectivity infrastructure by enabling reliable multi-site access, integrating secure public and private network to support critical government and industrial operations. Building cyber security resilience across sectors.</p>	<p>Enables agile, cost-effective, and secure connectivity for digital transformation enabling safe online platforms for business operation. Ensures high-speed, low-latency connectivity for industrial sites, enabling real-time communication, automation, and remote operations</p>	<p>Expands digital access to underserved areas, supporting workforce inclusion and community connectivity. Facilitates remote work, e-learning, and telemedicine for underserved areas while protecting community data and digital platforms from cyber threats.</p>
<p>Enhancing IoT adoption NB-IoT networks helped industries to expand their digital transformation and smart manufacturing. Fleet management system improves logistics and fleet oversight for public agencies and state-owned enterprises, supporting efficient resource allocation. Air quality & flood monitoring enables early warning systems and real-time environmental data for government agencies.</p>	<p>Fully fledge tracking management solutions provide operational control through real time tracking, to facilitate vehicle maintenance, driver performance monitoring, worker safety, asset tracking, and crew scheduling in industrial operations.</p> <p>Air quality and flood monitoring will minimise operational disruptions by proactively managing environmental risks.</p>	<p>Empowering Smart Manufacturing and Fleet Management System drives high level of energy efficiency reducing GHG.</p> <p>Air quality and flood monitoring improves public health and safety by enabling proactive measures against pollution and natural hazards.</p>
<p>Physical Security Services Enhancing national security and infrastructure resilience through intelligent surveillance solutions</p>	<p>Enabling businesses with real-time video intelligence, local private cloud-based storage, monitoring, management and analytics for smarter decision-making.</p>	<p>Supporting public safety, community wellbeing, and disaster response with scalable and reliable video surveillance services.</p>
<p>Cloud and Data Centre Data Centre contributes to nation-building by providing secure, reliable digital infrastructure that enhances economic growth, governance, and social development.</p>	<p>Provides scalable, cost-effective cloud solutions that boost collaboration, data security, and innovation. Paired with Data Center's colocation services, which enhance energy efficiency and reduce operational costs, businesses achieve greater efficiency and sustainability, while supporting renewable energy integration.</p>	<p>Cloud computing eliminates the need for businesses to invest in expensive physical infrastructure, enabling them to scale resources as needed while reducing maintenance costs. Specially on banking, education, government, and healthcare. These solutions are scalable and drive digital transformation.</p>
<p>Big Data Services Provides insight to support government identify high-impact locations for infrastructure and public services.</p>	<p>Support businesses, including SMEs to identify strategic locations for better market positioning.</p>	<p>Enable SMEs to target the right business location, contributing to economic growth and job creation.</p>

Advancing Cyber Resilience for the Digital Age

HELIOS: A next-generation AI powered threat attribution platform developed to address the growing complexity and sophistication of modern cyber threats across critical industries, including finance, energy, manufacturing, telecommunications, and healthcare.

As part of Axiata's cyber security strategy, HELIOS mitigates business risks, reduces operational costs through automation, and strengthens digital trust by ensuring compliance with regulatory and data

privacy requirements. HELIOS reinforces Axiata's leadership in cyber security transformation with its patent-pending status in Malaysia and multiple 2024 innovation awards.

Looking ahead, Axiata aims to scale HELIOS across ASEAN and beyond, integrate it with next-generation cloud-native security frameworks, and drive global recognition through additional patents and industry partnerships.

ADVANCING GREEN ECONOMY

What This Means to Us

We recognise that Asia's progress depends on balancing digital advancement with environmental sustainability. Sustainable development is essential for both our planet and the growth of technology. Through collaboration and partnerships, Axiata drives decarbonisation efforts to secure a sustainable future for Asia and beyond.

Material Matters

9 16

Prioritised UN SDGs



CLIMATE CHANGE

Why Is This Important

Integrating climate action into our broader sustainability agenda is essential in response to clear climate science and the urgent call for action. Setting clear climate targets strengthens operational resilience, drives innovation, enhances market leadership, and improves long-term efficiency. These efforts are critical to align with sustainability goals and reinforcing our commitment to responsible and future-ready growth.

Our Approach

Our approach to climate action is driven by clear targets aligned with the Science Based Targets initiative (SBTi) Business Ambition for 1.5°C. We commit to achieving net-zero emissions by 2050, ensuring our long-term resilience and responsibility to future generations. This commitment shapes our Net-Zero Carbon Roadmap, guiding our strategy to reduce emissions across our operations. To strengthen our approach, we adopt the Task Force on Climate-related Financial Disclosures (TCFD) recommendations, enhancing our ability to assess climate risks, integrate sustainability into decision-making, and drive meaningful progress.

Moving Forward

Axiata has made significant progress, receiving SBTi approval for our near-term as well as long-term targets based on a 2022 baseline, and is the first telecommunications company in Malaysia to have achieved this. We remain optimistic about new technologies, regulatory shifts, and national-level actions accelerating the transition to a low-carbon economy. By forging transformative partnerships and prioritising investments in energy efficiency and renewable energy, we are dedicated to navigating evolving regulations and climate policies to effectively mitigate climate impacts and drive the shift to a sustainable future.

Our Progress

Advancing Net-Zero Carbon Pathway

Axiata's Net-Zero Carbon Roadmap outlines three strategic objectives to drive collective action and pave the Group's path towards achieving net-zero carbon emissions by no later than 2050:

Decarbonise Network Operations

Near-term target to reduce absolute scope 1 and scope 2 GHG emissions by 42% by 2030 and 90% by 2050 from a 2022 base year.

Transform Our Value Chain

Long-term target to reduce absolute scope 3 GHG emissions by 25% by 2030 and 90% by 2050 from a 2022 base year.

Deliver An Inclusive Climate Agenda

Contribute to positive climate action through carbon removal and by enabling avoidance through technology and digitisation.

SBTi Approves Axiata Group's Science-based Targets

As one of Asia's largest telecommunications groups with more than 175¹ million users across eight countries, Axiata is taking responsibility for its direct and indirect emissions. Committed to climate action, the Group has set credible reduction targets and aligned them with the SBTi to establish a clear pathway towards a 1.5°C-aligned climate plan.

In June 2024, Axiata received approval from the SBTi for its near-term and net-zero targets based on a 2022 baseline. Axiata is the first telecommunications company in Malaysia to have its carbon reduction targets approved by the SBTi. These targets include reducing absolute Scope 1 and Scope 2 GHG emissions by 42% by 2030 and 90% by 2050, as well as reducing absolute Scope 3 GHG emissions by 25% by 2030 and 90% by 2050. With this endorsement, Axiata confirms that its decarbonisation pathway is scientifically aligned.

Note: ¹ Includes digital telcos and digital businesses in footprint countries






ADVANCING GREEN ECONOMY

Our Progress (cont'd)

Strengthening Our Net-Zero Efforts

We continue to advance on our net-zero carbon pathway with SBTi-approved targets, integrating climate action across our operations to reduce emissions as well as emissions intensity and ensure long-term sustainability.

Objective 1 Accelerate Decarbonisations of Network Operations

Initiatives	2024 Group Progress	2024 Initiatives
<p>Developing Scope 1 and Scope 2 Decarbonisation Strategy</p> <p>Work at Group-level to analyse emissions, prioritise energy efficiency measures, expand renewable energy adoption, and explore policy engagement to accelerate carbon reduction across our operations.</p>	<p>Ongoing development of a strategic roadmap for Scope 1 and Scope 2 emissions reduction, focusing on energy efficiency in network infrastructure, expanding on-site renewable energy generation, and continuously assessing Renewable Energy Certificate (REC) and Power Purchase Agreement (PPA) procurement in high-emission markets for our OpCos. XL purchased 1,000 RECs in 2024 as part of this effort.</p>	<p> Convened the Axiata Sustainability & Reporting Suite Forum in Jakarta, co-hosted by XL and Link Net to align OpCos with net-zero and TCFD action plans, strengthen Sustainability Framework implementation, and standardise reporting. Key discussions included Scope 1, 2, and 3 emissions management, waste strategy development, and best practices in digital inclusion and UN SDG reporting, with insights from global peers, external consultants and professional bodies.</p> <p> Subscribed to TNB's Green Electricity Tariff (GET) Programme for selected sites in Malaysia as part of renewable energy transition.</p>
<p>Enhance Energy Efficiency</p> <p>Improving energy efficiency is a key priority in our journey to net-zero by 2050. We optimise infrastructure by upgrading power systems, transitioning legacy indoor sites to outdoor sites to eliminate cooling needs, and deploying solar panels across thousands of sites for hybrid power supply. We continue to explore network modernisation and collaborate with partners to drive further energy efficiency improvements.</p>	<p>Achieved approximately 11% reduction in network fuel energy consumption and a 29% reduction YoY in facility electricity energy consumption through continued optimisation efforts.</p>	<p> </p> <ul style="list-style-type: none"> Implemented Features Saving, Simplification, and Fuel Reduction from Descoping, reducing electricity and fuel consumption at network sites Saved approximately 93 million kWh of electricity and 112 litres of fuel in 2024 through XL's energy efficiency initiatives, equivalent to avoiding 70,298 tCO₂e emissions Installed new batteries at 495 Robi-owned sites, reducing reliance on petrol and diesel powered genset, leading to 265 tCO₂e reduction Deployed Express Line in 4 core sites (99.99% uptime), minimising diesel-powered genset dependency and avoiding 76 tCO₂e emissions Implemented energy efficiency measures, including reorganising high-fuel-consuming generators, shutting down power for offloaded service nodes (TX), implementing containment for cooling optimisation, and modernising and shutting down Core Power Control Unit (PCU) and Computer-Aided Cooling (CAC), which resulted in a total reduction of 550 tCO₂e Upgraded rectifiers at 1,047 sites, improving AC to DC conversion efficiency, electricity use, and reducing 622 tCO₂e <p></p> <ul style="list-style-type: none"> Converted 603 indoor base station sites to outdoor setups in 2024, improving energy efficiency and reducing cooling needs Identified and addressed high Power Usage Effectiveness (PUE) sites, implementing solutions to optimise energy consumption Conducted metre calibrations and detected illegal power tapping, rectifying inefficiencies through PUE analysis Reduced energy consumption through network modernisation, legacy system shutdowns and the closures of six sites to conserve energy

ADVANCING GREEN ECONOMY

Our Progress (cont'd)

Objective 1 Accelerate Decarbonisations of Network Operations (cont'd)

Initiatives

2024 Group Progress

2024 Initiatives

Increase Renewable Energy Adoption

Given the carbon-intensive energy mix in our markets, we are actively integrating renewable energy into our operations to reduce emissions. We have deployed solar power at base stations, cutting reliance on grid electricity and generator fuel. OpCos have also replaced generators with lithium batteries and implemented hybrid charging systems for remote Base Transceiver Stations (BTS), reducing diesel consumption. We are also leveraging solar and hybrid renewable solutions to power our telco towers, further advancing our decarbonisation efforts.

Established over 7,178 solar sites by the end of 2024, an increase of 2% (+150 sites) from 2023 through collective efforts.



- Deployed solar panels and purchased 1,000 RECs
- Operated four new Supernode Solar Panels in Sukasari, Cianjur, Mangkang, and Solo, alongside existing smaller solar installations across Indonesia



- Implemented solar energy solutions at new and existing access sites, adding nearly 50 kW of solar capacity in 2024 through one new site and capacity enhancements at three existing sites



- Implemented iPowerStar 2.0 across the Smart network, an AI-powered solution that optimises base station power usage based on demand, reducing energy consumption by 6% without compromising service quality
- Implemented Intelligent Digital Management Unit (iDMU) at 74 sites in 2024, dynamically managing network capacity by shutting down low-traffic cells
- Modernised data centres by upgrading the cooling system from downflow to in-row, reducing energy consumption by ~ 11,000 kW/year and lowering operational costs



- Implemented DC Energy Leasing to provide cost-effective power solutions in energy-critical markets to optimise network energy consumption and reduce operational costs
- Deployed Remote Monitoring System (RMS) for real-time monitoring and seamless integration with site equipment to improve energy efficiency and enable proactive maintenance



- Upgraded HFC to FTTH, completing the transition for 750,000 homes passed out of 4 million targeted, improving energy efficiency and network performance



- Expanded renewable energy initiatives by deploying 150 new solar sites in 2024, bringing the total to 1,674 sites, further supporting ongoing energy optimisation efforts



- Converted genset sites to solar hybrid sites, integrating solar Photovoltaic (PV) panels with diesel generators to ensure reliable power for off-grid locations. Deployed at 10 sites in Pakistan and 1 site in the Philippines, contributing to lower carbon emissions and improved energy efficiency

ADVANCING GREEN ECONOMY

Our Progress (cont'd)

Objective 2 Accelerate Transformation of Our Value Chain

Initiatives

Strengthen Value Chain Collaboration

We are driving supply chain decarbonisation by identifying emission sources and establishing a Scope 3 baseline. Using a globally recognised methodology from Global System for Mobile Communications Association (GSMA), Global Enabling Sustainability Initiative (GeSI) and International Telecommunication Union (ITU), we enhance supplier engagement to improve climate management and reduce emissions across our value chain.

2024 Group Progress



- Hosted Sustainability Month 2024, engaging employees, suppliers, and stakeholders in sustainability initiatives to advance Axiata's net-zero commitment
- Held a Supplier Forum addressing net-zero transformation, emissions management, and decarbonising the supply chain through partnerships
- Challenged employees to reduce paper and electricity usage while encouraging suppliers to enhance transparency in emissions reporting
- Upheld Axiata's Supplier Code of Conduct, requiring suppliers to operate responsibly, comply with environmental regulations, and meet contractual sustainability requirements

2024 Initiatives



- Recognised partners' sustainability efforts through the XL Axiata ESG Warrior Awards, to encourage ESG initiatives across the value chain



- Selected vendors, representing 11% of the 2023 total spend, were audited in 2024, with a waste evaluation tool integrated into these audits to enhance carbon performance and raise operational awareness



- Engaged top suppliers to raise awareness of environmental challenges, best practices, and collaborative efforts to starting reducing their carbon footprint



- Launched the Vendor Development Programme (VDP) 2024, focusing on empowering key suppliers to strengthen ESG, Occupational Health & Safety (OHS), risk management, and anti-bribery practices across the supply chain
- Conducted Supplier ESG Assessments while also mapping gaps for further improvement through future engagements
- Conducted inaugural ESG Telecommunication & Technology Roundtable entitled "Decarbonisation of the Telco Industry and its Challenges" brought together 18 participants representing eight organisations, including our customers, vendors, industry peers and a government agency, examined industry readiness for carbon reduction targets and supply chain decarbonisation challenges

Objective 3 Deliver an Inclusive Climate Agenda

Initiatives

Developing Carbon Removal Pathways

Neutralised residual emissions through natural and technological solutions in owned and supported projects, aligning with SBTi standards that prioritise value chain emissions reductions before removals and Beyond Value Chain Mitigation (BVCM).

2024 Group Progress

Continue monitoring SBTi guidance on neutralisation and BVCM to integrate into our net-zero strategy.

2024 Initiatives



- Launched a tech-driven conservation platform to track carbon absorption, tree growth, and biodiversity impact
- Enabled B2B and B2C models to drive conservation efforts



- Infrastructure improvements, including the installation of advanced cooling systems and in-row cooling to recycle waste heat, were implemented, which focused on specific heat-producing zones, leading to energy savings and lower operational costs
- Relocated equipment from the data centre to containment areas, optimising energy use and cooling efficiency

ADVANCING GREEN ECONOMY

Our Progress (cont'd)

Objective 3 Deliver an Inclusive Climate Agenda (cont'd)

Initiatives	2024 Group Progress	2024 Initiatives
<p>Enable Carbon Avoidance We drive decarbonisation by providing products and services that help society, businesses, and SMEs reduce emissions. Mobile and digital technology can cut emissions by 40% in power and energy, transport, buildings, and manufacturing, which are sectors that account for 80% of global emissions.</p>	<p>Enable industries in our markets to reduce environmental impact through Enterprise solutions, leveraging digitalisation and innovation to drive resource optimisation and lower energy consumption.</p>	<p>Smart</p> <ul style="list-style-type: none"> Converted 23 sites from off-grid to grid connections in 2024 (30 sites in 2023), ensuring a reliable power supply, reducing diesel consumption, and lowering operational costs <p>EDOTCO</p> <ul style="list-style-type: none"> Converted 11 genset sites to Solar Hybrid Sites, integrating solar PV with diesel generators to enhance energy reliability, reduce fuel consumption, and lower carbon emissions Deployed DC Energy Leasing solutions, providing cost-effective power options in energy-critical markets

Task Force on Climate-related Financial Disclosures (TCFD)

We are committed to strengthening our climate-related disclosures by aligning with Axiata's TCFD three-year roadmap (2022-2024) and progressively closing any gaps. Recognising that TCFD recommendations are now integrated into the IFRS S2 Climate-related Disclosures issued by the ISSB, we ensure our reporting remains consistent with its 4 core pillars and 11 recommended disclosures. Since embarking on our TCFD journey, we have continuously refined our data, methodologies, and climate practices. As we advance, we will update and enhance our approach to align with the latest reporting standards and frameworks.

Scope of TCFD

Digital Telco



Infrastructure



Digital Business



Governance

The Axiata Board holds ultimate responsibility for the Group's sustainability agenda, with the Board Sustainability Committee (BSC) overseeing climate-related matters and ensuring ESG integration into corporate strategy. Regular updates, including periodic BSC sessions as well as quarterly sustainability steering committee sessions, strengthen the board's oversight.

At the management level, the Group CEO and SLTs are accountable for sustainability-related KPIs, including climate change measures, which are linked to our net-zero commitment. Sustainability performance, with net-zero commitments, is integrated into remuneration-linked KPIs.

The Axiata Sustainability Steering Committee, chaired by the Group CEO & MD, ensures ESG collaboration and alignment across the Group, while OpCo CEOs and Boards integrate sustainability into decision-making and governance.

Progress in 2024

- Reviewed progress updates on Axiata's Net-Zero Carbon Roadmap roll out, including Scope 1, 2, and 3 emissions
- Reviewed Axiata's sustainability performance and activities based on Axiata's Sustainability Framework, ensuring alignment with the Group's climate-related targets and strategy
- Reviewed and approved the Sustainability Reporting Manual (SRM) for all Bursa's Common Indicators (BCIs), as well as overall ESG indicators' reporting, thereby strengthening climate-related disclosures in sustainability reporting
- Reviewed communication plan for the Group and OpCos, as well as sustainability initiatives and ESG KPI reporting with the Board Risk and Compliance Committee (BRCC)

Priorities for 2025

- Monitor the roll out of IFRS S1 and S2 sustainability disclosure standards, as per the National Sustainability Reporting Framework (NSRF) released in September 2024
- Review and oversee Axiata's sustainability performance and activities based on Axiata's Sustainability Framework and ESG KPI reporting
- Review progress updates on Axiata's Net-Zero Carbon Roadmap roll out for Scope 1, 2 and 3 emissions
- Review and monitor metrics and targets pertaining to key sustainability matters, by incorporating relevant metrics and targets into OpCos' CEO annual KPIs
- Monitor progress on ESG data automation to streamline processes across OpCos while ensuring a smoother assurance process in future years

ADVANCING GREEN ECONOMY

Our Progress (cont'd)

Strategy

Sustainability is embedded in our corporate strategy, and we are committed to achieving net-zero emissions by 2050. Recognising the connection between climate change and social inequality, we leverage our Telco-to-TechCo journey to drive both climate action and economic growth across the markets we serve.

We have strengthened our climate agenda through our SBTi-approved science-based targets and the implementation of our Net-Zero Carbon Roadmap. Our strategy remains aligned with TCFD recommendations, ensuring that climate risk assessments, scenario analysis, and decarbonisation efforts are integrated into business resilience and long-term value creation. As sustainability reporting standards evolve, we continue monitoring IFRS S1 & S2 implementation to ensure our practices remain aligned with future requirements.

Risk Management

We strengthen our climate risk management by identifying, assessing, and integrating climate-related risks and opportunities into our Enterprise Risk Management (ERM) Framework. This approach enhances business resilience and decision-making by embedding climate considerations into strategic planning.

In the future, we plan to further integrate climate-related risks into relevant planning and/or decision-making processes to align with the evolving disclosure requirements of IFRS S1 and S2, which will apply from 2025. This will enhance transparency, support risk-informed decision and strengthen our climate resilience strategy.

Risk Assessment

We conduct ongoing climate risk assessments to anticipate potential impacts, support informed decision-making, and strengthen long-term sustainability efforts.

Systematic Climate Risk Assessments

Conducted evaluation on physical and transition risks to ensure alignment with evolving regulatory and market expectations.

Integration into ERM Framework

Embedded climate risks into policies, procedures, risk appetite, tolerance, and mitigation strategies to strengthen oversight and response measures.

Expansion of Risk Monitoring

Implemented monitoring mechanisms to track climate-related risks across all OpCos, with regular reviews conducted by the BRCC.

Capability Maturity Model Integration (CMMI) Matrix Implementation

Leveraged the CMMI matrix to measure and monitor our ability to mitigate climate-related risks.

Climate-Related Risks

We continuously evaluate transition and physical climate-related risks to stay ahead of emerging challenges in 2024.

Risk Category	Potential Risks	Potential Impact (non-exhaustive)
Transition Risks		
Policy & Legal Implementing government policies addressing climate change	<ul style="list-style-type: none"> Increased pricing of GHG emissions (carbon pricing mechanism) Evolving regulatory mandates on existing & future products and services 	<ul style="list-style-type: none"> Customer loss due to higher product and service prices from carbon taxes Increased compliance costs and regulatory requirements Stranded assets, such as copper networks and inefficient building systems
Technology Write-offs for obsolete technologies and investments in new ones while transitioning to low-carbon technology	<ul style="list-style-type: none"> Increased cost of investments in resilient infrastructure and low-carbon technologies to meet climate goals 	<ul style="list-style-type: none"> Increased investment in climate-resilient, low-carbon infrastructure Higher spending on workforce upskilling, research and development (R&D), and innovation Budget allocation plan for minimising impacts from costs required to invest in low-carbon solutions
Market & Economic Shifts in supply and demand for commodities, products, and services	<ul style="list-style-type: none"> Shifting customer behaviour and investor expectations towards digital solutions, along with environmental and social considerations 	<ul style="list-style-type: none"> Untapped opportunities from evolving stakeholder demands Risk of capital loss due to low valuation and unmet climate expectations from finance providers Reduced funding for mitigation and adaptation amid global economic challenges Absence of services/ solutions/ programmes that contribute to emission reduction
Reputational Risks Brand damage and stakeholder trust erosion	<ul style="list-style-type: none"> Heightened stakeholder concerns or negative feedback 	<ul style="list-style-type: none"> Failure to meet emerging and evolving stakeholder perceptions on responsiveness towards climate resilience. This may lead to adversarial impact on customer as well as employee retention
Physical Risks		
Acute Physical Risks Greater exposure to frequent and severe extreme weather events	<ul style="list-style-type: none"> Increased severity of extreme weather events, such as floods, tropical cyclones, water scarcity / stress, droughts, and heatwaves 	<ul style="list-style-type: none"> Higher costs for infrastructure repairs and maintenance due to weather damage and lack of contingency and climate adaptive measures More frequent network and customer service disruptions
Chronic Physical Risks Exposure to long-term and incremental shifts in climate patterns	<ul style="list-style-type: none"> Changes in precipitation patterns and extreme variability in weather patterns Rising mean temperatures Rising sea levels 	<ul style="list-style-type: none"> Asset devaluation or early retirement in high-risk areas (e.g., flood-prone zones) Reduced service quality from lower productivity Higher insurance costs or limited coverage for high-risk assets

ADVANCING GREEN ECONOMY

Our Progress (cont'd)

Opportunity Assessment

We assess climate-related opportunities to maximise benefits from low-carbon solutions, enhance competitiveness, and align with shifting consumer and investor expectations. OpCo assessments show that renewable energy adoption has improved reputation and market positioning, reinforcing its long-term economic benefits. These insights, combined with climate scenario analysis, inform our strategic approach to climate adaptation and business growth.

Opportunity Category	Potential Opportunities	Potential Impacts (non-exhaustive)
Resource Efficiency Optimising energy, water, waste and material use through efficient processes and equipment	<ul style="list-style-type: none"> Improve production and distribution processes to enhance efficiencies Source from environmentally responsible suppliers 	<ul style="list-style-type: none"> Lower utility bills, carbon costs and procurement expenses through deployment of resources more efficiently Increased asset value from energy-efficient infrastructure Strategic partnerships to reduce capital needs and maximise impact
Energy Source Utilise renewable energy and explore carbon trading platforms	<ul style="list-style-type: none"> Use lower-emission energy sources Engage in carbon markets Participate early in renewable energy programmes 	<ul style="list-style-type: none"> Avoid penalties, legal risks and reputational damage from non-compliance with climate regulations Enhance reputation by responding to consumer and investor demand Achieve long-term cost savings through on-site renewable energy Explore new revenue streams, while mobilising capital to emissions reduction projects
Products and Services Develop low-emission solutions and climate adaptation measures	<ul style="list-style-type: none"> Shift to low-emission products and services, to improve competitive positioning Collaborate with external partners for climate-resilient solutions to reduce start-up costs and improve supply chain resilience 	<ul style="list-style-type: none"> Generate revenue from new low-carbon products and services - promoting additional customer segments Improve product quality through upskilled employees in low-carbon solutions Strengthen supply chains by adopting circular business models
Market Expand into new markets and access lower financing costs for low-carbon solutions	<ul style="list-style-type: none"> Tap into new markets with climate-conscious consumers* Enhance reputation by aligning with evolving consumer and investor expectations Leverage public and private incentives for emission reduction projects 	<ul style="list-style-type: none"> Expand customer reach in new markets Gain access to sustainable and climate financing for low-carbon innovation Strengthen competitive position, attracting more customers and talent Improve market valuation and capital access through enhanced ESG and climate performance.
Resilience Strengthen adaptive capacity to address climate change	<ul style="list-style-type: none"> Engage in renewable energy programmes and adopt energy efficiency measures Attain sustainability certifications and energy labels for efficient products and services Enhance climate resilience of operations, infrastructure and workforce (e.g. implementing physical measures and monitoring systems for mitigation, establishing backup infrastructure and setting up alternative working sites) Enhance community and consumer resilience 	<ul style="list-style-type: none"> Generate additional revenue from renewable energy programmes Increase asset value through improved energy performance Reduce service downtime by enhancing workforce health, safety and supply chain reliability

Note: * Overlaps in opportunities

We will continue refining our climate risk & opportunity framework by incorporating insights from IFRS S2 climate-related disclosures, strengthening data-driven scenario analysis, and improving risk mitigation strategies. As we prepare the 2025 update, we will assess new developments, emerging risks and evolving business impacts to ensure a comprehensive and future-ready approach.

Priorities for 2025

- We are currently evaluating the financial implications of key climate risks and opportunities
- We will initiate the process of assessing and integrating IFRS S1 and S2 requirements into our disclosures while keeping abreast of these sustainability standards. In line with the NSRF, we will also evaluate the alignment of our reporting with these evolving global standards

Metrics and Targets

Our operations rely predominantly on non-renewable energy, which contributes to carbon emissions and climate change. To manage our carbon footprint, we prioritise energy consumption management through continuous monitoring, identifying emission sources and exploring reduction opportunities. By tracking data accurately, we enhance transparency, strengthen stakeholder trust and align with TCFD disclosure and risk management principles.

Carbon Emissions Across the Group and Boundary Adjustments

We track and refine our carbon emissions data across Scope 1, 2 and 3 of which categories 6 & 7 have been reported as part of Bursa Common Indicators, ensuring accuracy amid evolving emission factors, operational changes and corporate exercises. In 2024, we adopted the latest IEA 2023 Emissions Factors, which were incorporated into our GHG emissions (Scope 1 and 2) assurance process by an external assurer. We will continue monitoring the impact of future updates, including the upcoming IEA 2024 factors, on our emissions reporting.

Our emissions boundary setting has also been updated to reflect the recent corporate exercises undertaken. This includes Dialog's acquisition of Airtel Lanka, and Link Net's transfer of fixed broadband customers to XL in 2024, which led to adjustments in ESG indicators. Additionally, we have included Reddot's emission data into the Robi Group emission boundary to improve data quality.

ADVANCING GREEN ECONOMY

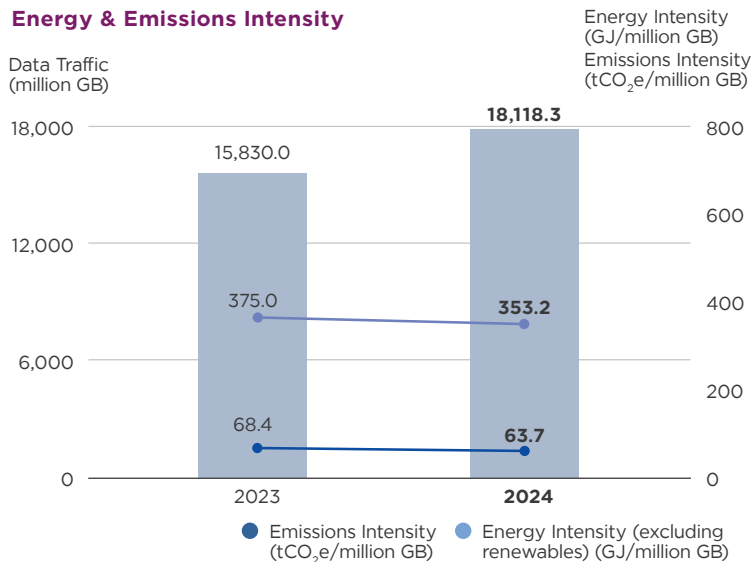
Our Progress (cont'd)

Climate Action Targets and Performance

The table below outlines Axiata's climate commitments to reduce its emissions:

Focus Areas	Metrics	Targets	2024 Performance (from 2023)	Time Horizon
Emissions Reduction	GHG Emissions	Reduce absolute Scope 1 & 2 emissions by 42% by 2030 and 90% by 2050 (from 2022 baseline) Reduce absolute Scope 3 emissions by 25% by 2030 and 90% by 2050 (from 2022 baseline)	Scope 1 emissions reduced by 7% Scope 2 emissions increased by 7% due to business growth, mainly attributed to the rise in the number of sites, additional equipment, and efforts to enhance network quality and efficiency	2030/2050 2030/2050
Emissions Intensity	Emissions Intensity	Reduce emissions intensity YoY	7% reduction YoY in 2024	Annual
Energy Intensity	Energy Intensity	Improve energy efficiency YoY	6% reduction YoY in 2024	Annual

Energy & Emissions Intensity

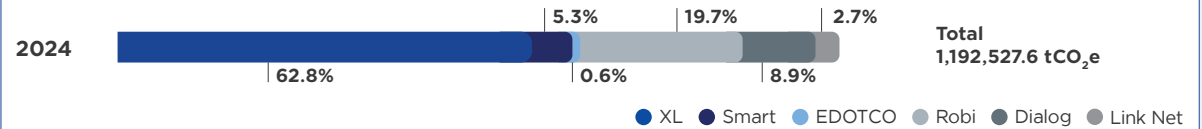


We revised our Scope 1 and 2 emissions baseline from 2020 to 2022, for setting SBTi targets using the most recent inventory. Our updated 2022 baseline totals 1,039,646.60 tCO₂e for both Scope 1 & 2. Please refer to SNCR 2023 for a detailed breakdown by OpCos. We also calculated our 2024 Scope 3 emissions for Category 6 (Business Travel) and Category 7 (Employee Commuting), reported in the Bursa Malaysia Performance Data section.

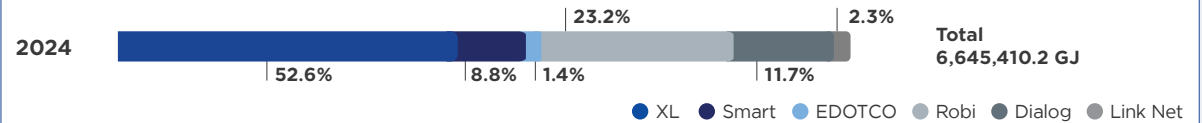
Overall Group-wide Scope 1 & 2 Emissions (tCO₂e)



Total Scope 1 & 2 Emissions by OpCos[^] (tCO₂e)

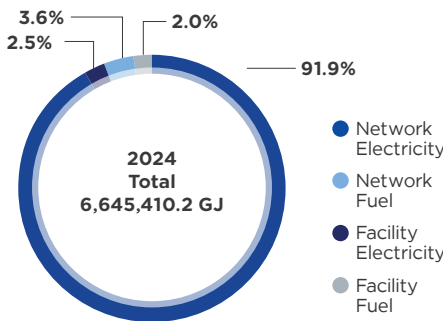


Energy Consumption (excluding RE) Breakdown by OpCos[^] (GJ)

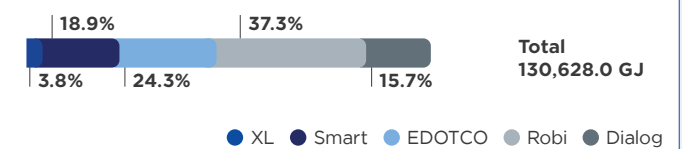


Close to 92% of energy consumed across the operations in 2024 was used to power the network. Overall, total energy usage increased by approximately 7% as compared to 2023. The abovementioned energy consumption does not include energy generated from renewables and it is reported separately below:

Energy Consumption (excluding RE) Breakdown by Categories[^]



Renewable Energy Consumption Breakdown by OpCos



Our renewable energy initiatives are driven by a combination of solar PV systems and purchased certified RECs from local energy suppliers. This approach ensures a cleaner electricity supply while aligning with GRI 302 reporting standards on energy consumption and sustainability.

Notes: [^] This data was subjected to external independent limited assurance. Refer to the independent assurance report on pages 149 to 150. The Scope 1 and Scope 2 GHG emissions of Axiata are reported based on the GHG Protocol's Corporate Accounting and Reporting Standard issued by the World Resource Institute and World Business Council for Sustainable Development. Axiata applies the operational control approach in accounting for emissions from those sources over which Axiata has full authority to introduce and implement its operating policies, which includes Axiata and its subsidiaries. Axiata reporting boundary excludes Corporate Centre, 26 entities within the Digital Business (e.g., Boost, ADA and ADL) as well as 9 entities within the Digital Telcos under XL, Link Net and Dialog which are deemed immaterial to Axiata Group Berhad's overall GHG emissions.

ADVANCING GREEN ECONOMY

ENVIRONMENTAL MANAGEMENT

Why Is This Important

Effective environmental management ensures resource efficiency, risk mitigation, cost savings and regulatory compliance while supporting sustainable development goals. By minimising our environmental footprint, we create long-term value for stakeholders and contribute to a more sustainable future.

Our Approach

We integrate environmental sustainability into our operations by minimising our environmental footprint and promoting responsible resource use. Our approach focuses on waste management, water conservation and biodiversity protection, while advancing towards a circular economy to enhance long-term sustainability.

Moving Forward

Axiata will strengthen its environmental management efforts across its operations, with a comprehensive focus on waste, water and biodiversity management in 2025. We will enhance the monitoring, tracking and evaluation of our environmental performance, actively seeking innovative solutions to reduce our impact. By prioritising waste management and circularity, we aim to foster sustainable practices and contribute to the preservation of natural resources across our footprint.

Our Progress

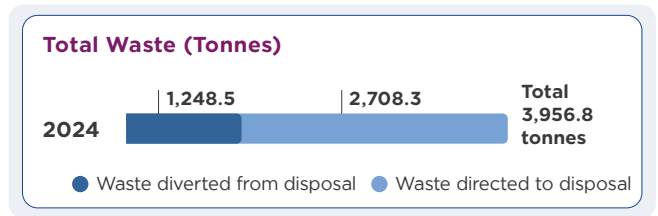
Waste Management

Effective waste management is integral to Axiata's net-zero commitment, ensuring responsible resource use and landfill waste reduction across our operations. We prioritise waste reduction, recycling and e-waste management, while also collaborating with our suppliers to minimise waste generation across the procurement process.

In 2024, the Group began monitoring waste management-related metrics, marking its first year of structured data collection across its operations. While full 12-month coverage is not yet available, all OpCos have reported data for at least three months, with some beginning their tracking efforts in the last quarter of 2024.

Most OpCos reported on waste management, though reporting on waste diverted from disposal remains incomplete. To strengthen alignment and consistency in waste data reporting, the Group facilitated discussions through the Sustainability Steering Committee and Board Sustainability Committee meetings in 2024.

Moving forward, we will continue to enhance waste monitoring, tracking and evaluation, while driving innovative solutions to improve waste management and circularity across our operations.

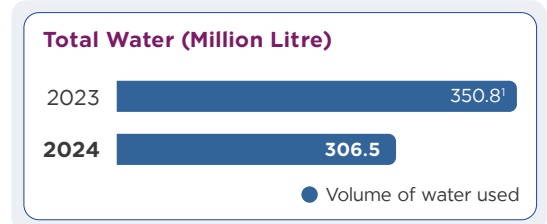


Water Management

While Axiata operates in a low water-intensive industry, we recognise the importance of efficient water use in our workplaces. We began tracking water consumption in 2023, with data currently covering OpCo headquarters for Robi, Smart and EDOTCO, while Link Net reports water usage at network sites.

In 2024, we expanded water consumption reporting coverage. New scopes and boundaries now include all OpCos, excluding ADA, while Boost reports on its Malaysia office. We plan to expand reporting to include all OpCos and their subsidiaries in the future. Communication regarding water consumption reporting has been conducted through the Sustainability Steering Committee and the Board Sustainability Committee meetings during the year.

To optimise water utilisation and efficiency, we are committed to implementing strategic initiatives across the Group.



Note: ¹ The FY2023 value has been restated from 501.6 million litres to 350.8 million litres due to misreporting by one of the OpCos

Biodiversity

Our industry can support biodiversity conservation through digital solutions that enhance natural resource management and promote sustainability. Technology enables efficient resource use, conservation efforts and strategies to mitigate biodiversity loss, helping to protect ecosystems and reduce socio-economic vulnerabilities in at-risk communities.




OpCos	Initiatives	2024 Progress
EDOTCO	<ul style="list-style-type: none"> Protecting Endangered Birds - supporting the coexistence of telco towers and eagle nesting Tracked migratory eagles since 2021 using its towers Formalised its commitment through the Bird Watch Pledge with the Malaysian Nature Society in 2023 Enforces policies to protect nests, raise awareness and assess biodiversity before tower construction 	<ul style="list-style-type: none"> Recorded an increase in the number of eagles residing on EDOTCO's towers, from 21 in 2021 to 52 in 2024 Collected over 5,255 kg of waste through coastal cleanup efforts in Malaysia, Bangladesh and Indonesia, with more than 240 volunteers contributing a total of 2,176 hours Planted 40 mangrove trees and 20 corals in Indonesia as part of our biodiversity conservation initiatives

ADVANCING GREEN ECONOMY

Our Progress (cont'd)

Strengthening Environmental Management Efforts Across Our OpCos

In 2024, the Group introduced its Health, Safety and Environment (HSE) Policy, reinforcing our commitment to environmental responsibility and a strong health and safety culture. Several OpCos, including Dialog and EDOTCO, have also adopted environmental policies, committing to compliance beyond regulatory requirements, net-zero targets and grievance mechanisms to address non-compliance. We will continue supporting other OpCos in developing policies tailored to their operations while embedding best practices across the Group.

OpCos	Initiatives	2024 Progress
 XL axiata	Organised a Sustainability Week and Waste Management Race, engaging employees in sustainable practices and circular economy principles. Sustainability Week was held twice in 2024, featuring expert talks and interactive activities to promote eco-friendly lifestyles and waste reduction. The Waste Management Race encouraged employees to properly sort waste through a monthly competition.	<ul style="list-style-type: none"> Hosted two Sustainability Weeks in 2024 Organised a Waste Management Race, awarding a 'Floor of the Month' for correct waste sorting Expanded the Waste Management Race to 2025, extending participation beyond headquarters to all regions
 Dialog	Conducted regular workshops and training sessions to educate employees and stakeholders on environmental challenges, sustainability practices and eco-friendly operations.	<ul style="list-style-type: none"> Held 11 awareness sessions on sustainability and environmental best practices
 robi	Supported ecological recovery in post-flood Feni by aiding affected farmers, planting trees in schools and piloting reforestation at BTS sites.	<ul style="list-style-type: none"> Distributed vegetable seeds and fertilisers to flood-affected farming families Planted 1,000 medicinal and fruit trees in schools with student and teacher involvement Piloted tree planting at Robi-owned BTS sites for site greening, which can contribute to carbon sequestration
	Embarked on recycling initiative to divert the waste from disposal.	<ul style="list-style-type: none"> Recycled 15.5 tonnes waste, including e-waste
 Smart	Collaborated with the Ministry of Environment and the Ministry of Education, Youth, and Sports to support the National Eco-School and Eco-Pagoda Guideline Dissemination 2024.	<ul style="list-style-type: none"> Reached over 45,000 individuals nationwide, including teachers, students, and religious leaders from schools, pagodas, churches, and mosques Promoted Eco-School and Eco-Pagoda Guidelines, equipping communities with practical tools for implementing sustainable practices
	Launched Internal Waste Separation and Plastic Recycling Project and partnered with Gomi Recycle Cambodia to reduce single-use plastic waste and ensure responsible processing.	<ul style="list-style-type: none"> Installed waste separation bins in 4 main offices and 6 high-traffic Smart Shops Increased employee awareness of waste reduction through internal communications and recycled 1.11 tonnes of single-use plastics
	Partnered with the Ministry of Environment to support Cambodia's national greening efforts, contributing to tree planting, biodiversity conservation, and climate action. Through the Green Sprouts initiative, Smart committed to supporting the government's "1 Million Saplings" initiative for the national tree planting movement.	<ul style="list-style-type: none"> Engaged 35,000 participants in tree-planting efforts to combat deforestation Signed an MoU with the Ministry of Environment to drive Green Sprouts and sustainability initiatives Committed to generating 1 million saplings to support Cambodia's reforestation and biodiversity conservation efforts
 EDOTCO	Conducted various engagement sessions with stakeholders to promote climate action alignment across its supply chain.	<ul style="list-style-type: none"> Conducted 4 workshops throughout the year for its top 32 suppliers across its NTCs on OHS, Business Continuity Management, integrity, cyber security and sustainability Trained over 150 of EDOTCO's SME vendors in Malaysia in collaboration with the Center for Entrepreneurship Development and Research and the UNGCMYB Conducted inaugural ESG Telecommunication & Technology Roundtable entitled "Decarbonisation of the Telco Industry and its Challenges" brought together 18 participants representing eight organisations, including our customers, vendors, industry peers and a government agency

ADVANCING OUR PEOPLE & COMMUNITIES

What This Means to Us

Our commitment to a Winning Culture is built on the belief that people drive progress, within our organisation, in the marketplace and across communities. We foster an inclusive and dynamic work environment where individuals can grow, contribute and innovate. Beyond the workplace, we harness technology to create meaningful impact through long-term initiatives in education, community development and environmental sustainability. By doing so, we strengthen the communities we serve and empower them for a better future.

Material Matters

4 11 12 13 15

Prioritised UN SDGs



FAIR, DIVERSE & INCLUSIVE EMPLOYMENT

Why Is This Important

Fairness, diversity, and inclusion are integral to our Winning Culture, shaping an environment where every individual feels valued and empowered. With a team of approximately 10,500, we believe equitable opportunities drive innovation, strengthen morale and inspire exceptional performance, ensuring our collective success.

Our Approach

We are guided by our Winning Culture framework, where Passion for Collaboration drives us to embrace diversity and learn from each other. Our approach is anchored in established policies that govern recruitment, benefits and performance management, ensuring alignment with evolving industry standards.

Moving Forward

We will continue strengthening our commitment to fairness, diversity and inclusion by enhancing awareness programmes, and fostering a more inclusive workplace culture. We will track progress through employee feedback and industry benchmarks, ensuring that our initiatives drive meaningful impact and long-term sustainability.

Our Progress

Ensuring Fair and Equitable Opportunities

We uphold fair and inclusive employment through four key pillars that ensure equal opportunities, a supportive work environment, comprehensive benefits and continuous growth for all employees.

Recruitment

Ensure fair and non-discriminatory hiring practices that recognise diverse talents, evolving skill requirements and equal opportunities.

Working Conditions

Promote a safe and inclusive work environment, reinforced through:

- Employee Code of Conduct
- Diversity, Equity and Inclusion (DEI) Framework

Compensation and Benefits

Provide comprehensive benefits that contribute to a fair and supportive workplace culture.

Talent Development

Equip employees with the necessary tools and opportunities to grow via continuous learning, right-skilling and cross-functional collaboration to build a future-ready workforce.

In line with our commitment as a UN Global Compact signatory, we uphold the UNGC's Ten Principles, including the elimination of all forms of forced and compulsory labour, the abolition of child labour and the elimination of discrimination in employment and occupation.

Employee Code of Conduct

Axiata's Code of Conduct sets clear expectations for ethical and responsible interactions across our value chain, upholds universal human rights and aligns with the International Labour Organization (ILO) Core Labour Standards.

Respect for the ILO Convention

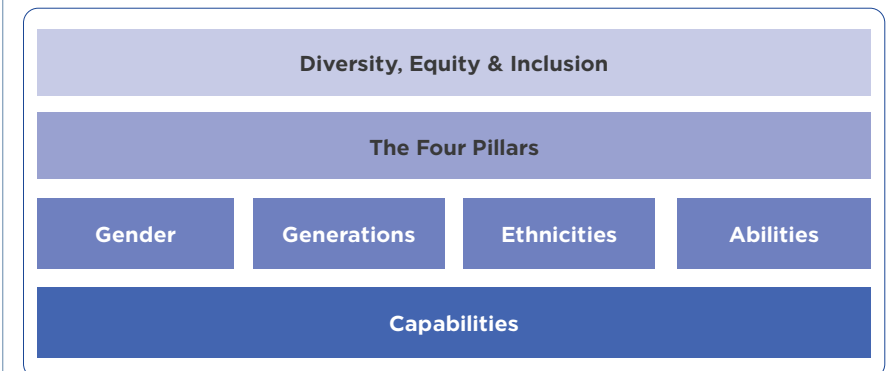
- Freedom from Forced Labour
- Freedom from Child Labour
- Freedom from Discrimination at Work
- Freedom to Form and Join a Union and to Bargain Collectively

To ensure accountability, we provide a grievance mechanism accessible to all stakeholders. Our Speak-Up channel offers a secure and confidential platform for reporting misconduct, illegal activities or unethical behaviour. This mechanism ensures individuals can voice concerns freely, without fear of retaliation or victimisation. We are pleased to report that no incidents related to human rights violations or breaches of labour standards occurred during the reporting period.

[IAR](#), Driving Governance and Risk on pages 84 to 93

DEI Our Workforce

DEI are fundamental to building strong leadership and driving business success. We foster an inclusive workplace that embraces differences in age, gender, race, ability, nationality and culture, so that everyone has equal opportunities to grow and excel.



Target

- Aim for 30% women's representation in Axiata Corporate Centre's Senior Management by 2025

2024 Performance

- Achieved 42.5% women's representation in Axiata Corporate Centre's Senior Management

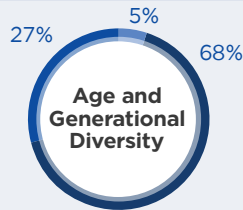
ADVANCING OUR PEOPLE & COMMUNITIES

Our Progress (cont'd)

Diverse Talent Base

Total number of employees
~10,500

Nationalities
37 employed across our OpCos



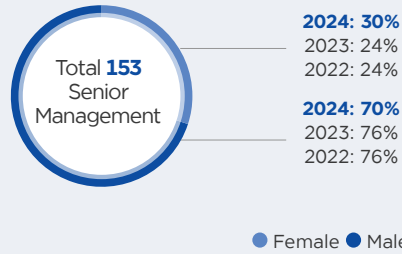
Gender Diversity

Male : Female
71% : 29%

- Under 30 years old
- Above 50 years old

Senior Management in Axiata Proportion of Senior Management Hired from the Local Community

Year	Proportion
2022	71%
2023	65%
2024	61%



Supporting Women

Since 2022, our adoption of the United Nations Women's Empowerment Principles (UN WEP) Charter has reinforced our commitment to gender equality and plays a crucial role in embedding DEI principles across all levels of the organisation.

OpCos Initiatives

- xl axiata** • Women in senior leadership include a female CEO and a female director, supporting gender diversity
- Dialog** • Signed the UN WEPs, aligning with its DEI principles
- robi** • Launched the Women's Inspiring Network (WIN) to empower female employees and promote a more inclusive workplace
• Implemented the Bloom Maternity Programme to support working mothers with maternity leave, reentry support and wellness resources
• Maintained 12.5% female representation at the Management Committee, with ongoing efforts to strengthen gender diversity in leadership
- Smart** • Celebrated International Women's Day
- linknet** • Five female employees received the Wanita Tangguh award in 2024
- AXIATA DIGITAL LABS** • Continued efforts to support and highlight women, through internal and external communication campaigns
• Women's day workshop comprising renowned women leaders from the industry

Championing Inclusion Through WAMA

The Group and our OpCos share a commitment to building an inclusive culture. The Women of Axiata and Male Allies (WAMA) initiative plays a key role in advancing DEI efforts, driving gender diversity, leadership opportunities and a culture of equality.

Advancing Workplace Accessibility for PWD

We strive to build a workplace that values and empowers individuals with disabilities, ensuring equal opportunities for growth and contribution, including Persons with Disabilities (PWD).

OpCos Initiatives

- xl axiata** • Launched the Disability Internship Programme (Sept 2024 - Oct 2025), providing 19 individuals with hearing and speech impairments hands-on experience across regional offices and headquarters. Employees volunteer as Buddies, mentoring and supporting interns in their professional journey
- Dialog** • Collaborated with MAS Holdings to run the Dialog MAS Enabler Programme 2024, providing internship exposure to 14 participants with disabilities

Building an Inclusive and Supportive Workplace

Our Winning Culture Framework



Core Values & Key Behaviours

We drive exceptional performance through the following:

Obsession for Customers

- Starting with customers in mind with every decision that we make
- Going the extra mile to deliver beyond customers' expectations

Courage for Change

- Fearlessly pushing boundaries and trying new things
- Continuously adapting and improving to get better every day

Passion for Collaboration

- Building trust in all relationships to work towards common goals
- Embracing diversity and learning from each other while upholding high ethical standards

Ways of Working

We leverage on our agility and innovation to deliver exceptional performance without compromising on ethics and integrity

Workplace, Marketplace & Communities

We are dedicated to achieving success in our operations, marketplace and communities by fostering a positive, safe and equitable environment that nurtures growth and wellbeing for all

We continued to strengthened our cultural foundation in 2024, and to gauge the adoption and impact, we conducted a Winning Culture Survey to gain valuable insights into our progress.

Survey findings:

- Passion for Collaboration stood out as a key strength
- Strong engagement among young executives and middle management across all 3 core values
- High positive scores for Obsession for Customers underpin our drive to becoming a high performing organisation
- A 5-point gender gap in Courage for Change highlights the need for targeted initiatives
- Employees under three months show strong cultural alignment, reinforcing the impact of early immersion

ADVANCING OUR PEOPLE & COMMUNITIES

Our Progress (cont'd)

Winning Culture Survey - Axiata Group

Passion for Collaboration continues to be a cultural strength, with strong overall scores, while new joiners report a highly positive onboarding experience—indicating the refreshed culture is resonating early. Opportunities remain to deepen change readiness and strengthen Courage for Change, particularly among mid-tenure employees and senior management.

Core Values



We continue to advance our Winning Culture journey to strengthen and deepen our change agility and foster a high-performing, inclusive environment where all employees can thrive.

OpCo Initiatives and Progress in 2024

Throughout 2024, our OpCos implemented targeted initiatives to foster employee engagement, DEI and workplace wellbeing.

OpCos Initiatives



- Launched Hall of Honour, a gamified recognition platform aligned with Robi's core values, achieving over 90% employee participation in peer-to-peer nominations
- Conducted Winning Culture Survey, recording strong scores across Obsession for Customers (89%), Passion for Collaboration (87%) and Courage for Change (86%)
- Revamped Performance Management System to reinforce pay-for-performance, ensure fairness and create structured career progression
- Developed high-potential talent strategy by identifying 10% of roles as unique and top 10% of employees as exceptional performers based on performance and potential assessments
- Prioritised succession planning for CXO and critical roles with global leadership training, job rotation and readiness-focused interventions
- Recruited 259 sales apprentices, with 190 deployed across six clusters, to build a strong frontline sales talent pipeline
- Trained 14 university graduates under the Elevate Interns programme through project-based learning, mentorship and structured assessments
- Received five accolades at the Asian Leadership Awards, including HR Team of the Year, Chief Human Resources Officer (CHRO) of the Year and CEO of the Year

OpCos Initiatives



- Introduced the new Winning Culture at the March Townhall with updated core values, followed by ongoing initiatives, including a dedicated session in the new employee onboarding programme, to embed these values into daily actions and decision-making
- Encourage peer recognition through gratitude cards at the Appreciation Week, highlight how colleagues embody Smart's core values
- Launched the Behaviour Recognition programme such as 'On-Spot Award' to celebrate colleagues who exemplify the company's core values, Customer, Change, Collaboration, and Commitment, in their daily work
- Hosted Smart Cultural Day during Pchum Ben 2024, celebrating diversity with employees from > 10 nationalities to strengthen unity and inclusiveness
- Smart ran the Core Values Session for CEO-2 and the Team Huddle Guide to further cascade to team members



- Launched our refreshed Culture Code and conducted Culture Code Index, which achieved a strong 88% score, demonstrating consistent alignment
- Organised employee engagement activities, including Sports Club launch, DEI celebrations, festive events and birthday recognitions, totalling 20,000+ hours (four hours per employee)
- Honoured employees' outstanding contributions through MC Awards and quarterly recognition programmes.



- Launched Core Values at Be in Touch Townhall, reinforcing cultural transformation
- Integrated Winning Culture into 'Food for Thought Sessions' with exclusive Winning Pins
- Introduced weekly Senyum Ketika Jumat, a peer recognition programme
- Held Wellness Day for medical check-ups, health talks and blood donations
- Encouraged sustainability with Daily Earth Hour & BeJo, promoting energy conservation and green initiatives



- Launched regional campaigns, including International Women's Day, Earth Month and Health & Wellness Month, to promote awareness and inclusivity
- Organised over 80 local engagement activities, including cultural celebrations, team bonding events and recognition initiatives
- Implemented ADA Wellness Day, promoting self-care through health screenings and mental wellness programmes
- Expanded market-wide wellness efforts with a Health Screening and Blood Donation Drive, reinforcing employee wellbeing and social responsibility



- Values relaunch campaign coupled with leadership communications and Townhall interactions
- Revamp People Competency Framework with an emphasis on Winning Culture
- Introduction of Talent Management Framework to identify critical talent and retention
- Revamp induction and onboarding process embedded on Winning Culture

ADVANCING OUR PEOPLE & COMMUNITIES

Our Progress (cont'd)

Employee Engagement

We engage employees through surveys, pulse checks, town halls and feedback sessions to enhance the workplace. In 2024, Axiata Group's EES scores dropped 5 percentage points due to market challenges and internal shifts. This highlights the need for a more targeted engagement approach. Moving forward, we will strengthen support, communication and strategic initiatives to build a more engaged workforce.

Communicate 2024 - Employee Engagement Survey (EES)

7,370 of 8,547 participants from Axiata Group



Total Respondents



Overall Engagement Score



Notes: ¹ ADA and XL did not participate at Group EES in 2024

² Excluding Axiata Group Berhad, ADA and Boost. The survey employed a Likert scale consisting of 63 questions, alongside two open-ended inquiries, structured in a questionnaire format, to gather and analyse data on EES results

³ We utilised a different survey platform to provide better results, insights and actions to improve overall employee satisfaction. Consequently, there was a drop in percentage due to the change of methodologies

OpCos Initiatives



- Focused initiatives on Winning Culture to drive adoption and embedment of new Core Values across divisions
- Conducted division-specific deep dives into how each can live and breathe the new Core Values
- Festive engagements guided by Winning Culture to support awareness and adoption
- Promoted informal engagement activities to foster deeper collaboration within and between teams



- Adopted a new engagement measurement approach amid the merger, ensuring alignment with evolving goals



- Increased EES scores, with a 3% rise in engagement and a 5% improvement in diversity metrics

ADVANCING OUR PEOPLE & COMMUNITIES

TALENT DEVELOPMENT

Why Is This Important

Future-ready talent is key to advancing Asia. We invest in tailored development strategies to nurture, retain and grow top talent while building digital competencies. Our programmes create an agile, competitive workforce, supporting career growth and meeting stakeholder expectations for organisational success.

Our Approach

Our approach focuses on continuous learning, right-skilling and cross-functional collaboration to build a future-ready workforce. We equip employees with relevant skills, foster agility and encourage knowledge-sharing across functions to drive innovation and impact.

Moving Forward

Our outlook focuses on AI-driven skills development and multigenerational workforce support to future-proof our organisation. We will integrate AI for strategic impact, enhance leadership development and strengthen our talent and succession planning to build a resilient, high-performing workforce.

Our Progress

Performance Management and Recognition

Effective performance management is key to employee growth and organisational excellence. Regular feedback and evaluations foster a culture of continuous improvement. Transparent communication on career aspirations and development plans empowers employees to take charge of their growth, strengthening leadership pipelines and ensuring long-term talent retention.

The Performance Management System (PMS) ensures a fair and transparent evaluation process by aligning individual and organisational goals to enhance performance, productivity and competency. It follows a structured cycle of goal setting, KPI verification, mid-year monitoring and year-end evaluation, which includes peer, self, superior and final reviews.

100% of our people received regular performance reviews in 2024

Talent Factory: Leadership Development and Talent Growth

We prioritise leadership development through targeted programmes that enhance decision-making, strategic thinking and organisational impact.

AGB Senior Leadership: Executive Coaching Programme

Four senior leaders attended six coaching sessions to enhance leadership, decision-making and self-awareness, driving transformation and performance.

Virtual Programme on Leaders Solving for Tomorrow

Two senior leaders joined an international programme to enhance leadership, systemic thinking and global awareness for sustained organisational change.

Senior Management Positions Filled Group-wide:

42 internal
18 external
Total: 60

Senior Management Appointment by Gender Group-wide:

16 Female
65 Male
Total: 81

Proportion of Senior Management Hired from the Local Community:

61%

OpCos Initiatives



We invest in leadership programmes to develop high-potential employees, focusing on the Engagement, Experience & Education (3 Es) framework: Engagement (70%) through workshops and case studies, Experience (20%) via projects and mentoring and Education (10%) with expert-led training.

Key Leadership Programmes

- Corporate Manager Development Programme
- Tech Leader Development Programme
- Elevate Your Business Insight & Be a Leader Who Matters
- Leaders Solving for Tomorrow
- Mentoring Programmes
- Leadership Lounge & My Journey My Story

The Dialog Academy and the Digital Transformation teams drives the Agile concept in the organisation, with its people achieving the following certifications in 2024.

Certification	Certified Count
Basic Agile	76
Dialog SCRUM	58
Dialog KANBAN	68
CSPO	15
Scaled Agile (SAFe)	15



Provide leadership development programmes to equip leaders with coaching skills, team-building strategies and daily leadership capabilities

- Advanced Coaching to embed a coaching culture
- Coaching Skills for department heads, managers and supervisors to coach their teams
- Experienced Leaders - trained in trust-building, team performance and feedback



Adopt two approaches which are 'Mind the Many' (broad employee development) and 'Accelerate the Few' (focused development for critical roles), with a focus on young talent with key competencies

- Strategic development programme for CXOs, GHs and key leaders
- Development programme for key successors of CXO roles
- Training for first-line leadership, stakeholder management, finance, coaching and mentoring
- Young talent programme covering interpersonal skills, design thinking, financial acumen and innovation
- Development for critical roles in Data Analytics, IT, Sales & Distribution and Marketing

ADVANCING OUR PEOPLE & COMMUNITIES

Our Progress (cont'd)

Learning and Development

In 2024, we reinforced our commitment to continuous learning and capability building through various training initiatives, conferences and certification programmes. Our approach focuses on strengthening expertise in AI, cyber security, governance and emerging technologies while ensuring compliance with mandatory training requirements.

Talent Development

	2023	2024 [^]
Training hours [*]	238,578	218,179
By employee category [*] :		
- Senior Management	9,685 (4.1%)	3,352 (1.54%)
- Middle Management	64,044 (26.8%)	70,368 (32.25%)
- Executive	156,560 (65.6%)	132,390 (60.68%)
- Non-Executive	8,289 (3.5%)	12,027 (5.51%)
- Others	-	42 (0.02%)

Note:

^{*} Training includes:

All types of vocational training and instruction paid educational leave provided by a company for its employees, training or education pursued externally and paid for in whole or in part by a company and training on specific topics. Training does not include on-site coaching by supervisors

- An employee is defined as an individual who is in an employment relationship with the company, according to national law or its application
- Employee category, refers to the breakdown of employees by level (such as senior management, middle management) and function (such as technical, administrative and production)

[^] The total training hours (by employee category) was subjected to external independent limited assurance. Refer to the independent assurance report on pages 149 to 150

Group Highlight for the Year

We prioritise Group-wide training focusing on cyber security and governance, ethics and risk management, and regulatory compliance. As AI becomes deeply integrated into our operations, we ensure our people are ready to navigate this evolving landscape with integrity and confidence. All Axiata Group employees participated in mandatory compliance training to further support ongoing learning and awareness.

Mandatory Compliance Training

Programmes	Attendees
<ul style="list-style-type: none"> Data Privacy Refresher Cyber Security Refresher Enterprise Risk Management 	All Employees
ABAC Refresher	All Employees

OpCos Initiatives



Ensured the delivery of a comprehensive range of talent development programmes tailored to its employees, in line with the Group's five portfolio vectors and five core business strategies. These programmes are designed to build future-ready capabilities by equipping employees with the skills and mindset to navigate an evolving digital landscape. They include leadership coaching to strengthen leadership effectiveness, upskilling in digital and AI competencies to support technology-driven transformation, and continuous learning through targeted modules and certifications that enable employees to innovate, adapt and contribute to operational excellence across the Group.



Fostered a culture of continuous learning through Dialog Academy, leveraging e-learning, virtual classrooms and personalised learning paths. Dialog Academy Programmes;

- Dialog Certified Solutions Expert
- Dialog Retail Sales Expert
- Digital Media Planning
- People Leader Development Programme
- Transforming Business with Emerging Teams
- Learning Hour monthly webinar
- Agile Development Certifications

Performance in 2024

- 100% completion of mandatory compliance training for Dialog Axiata PLC (DAP), Dialog Broadband Network (DBN), Dialog TV (DTV) and Airtel permanent employees
- 8.5% completion of newly introduced compliance training for outsourced employees and interns



- Upskilled employees in cyber security and AI to future-proof capabilities, including the 'Engage Smarter: AI Innovations in Next-Gen Customer Service' programme for five digital and customer experience employees
- Onboarded a Project Management Coach for three months of on-the-job training in project management, agile and hybrid methods
- Introduced new and enhanced training initiatives to foster learning and professional growth, including Brown Bag Sessions, Toastmasters Sessions and Smart Education Sponsorship Programme, which sponsored five employees for long-term and 13 for short-term programmes



- 59 participants completed the EDOTCO Talent Acceleration Programme (ETAP), which focuses on developing middle management talents and rising stars
- The CATALYST People Manager Programme has expanded its reach to develop 40 employees in 2024, with the aim to transform individual contributors into effective leaders



Invested in talent development through Leadership Academy, Competency Development and Group Risk & Compliance Awareness (GRCA) Training to enhance employee skills and leadership potential.

ADVANCING OUR PEOPLE & COMMUNITIES

EMPLOYEE HEALTH, SAFETY & WELLBEING

Why Is This Important

Axiata prioritises employee health, safety and wellbeing to ensure a secure and supportive work environment. As our people are central to operations, we implement comprehensive safety measures, protocols and wellbeing initiatives to protect them from hazards and promote overall wellness.

Our Approach

We comply with all local and international regulations. Our Axiata Group Berhad Safety Policy guides OpCos in implementing and reviewing OHS policies, while Health and Safety Committees work to minimise risks. Employees benefit from initiatives that promote physical and mental wellbeing, work-life balance and workplace safety, supported by the Wellbeing Circle and New Ways of Working strategies for continuous improvement.

Moving Forward

Axiata and its OpCos will continue to strengthen efforts to improve employee health, safety and wellbeing. We will continue to monitor key health and safety metrics to proactively address concerns. Our digital businesses will also expand OHS initiatives to embed a stronger safety culture across the Group.

Our Progress

Fostering a Safe and Productive Workplace

Axiata prioritises employee wellbeing through targeted health, safety, and wellness initiatives. We ensure a safe work environment by identifying and mitigating risks through Environmental, Safety and Health (ESH) systems and regular assessments.

In 2024, the Group developed and approved its Health, Safety and Environment (HSE) Policy, which is aligned with the Axiata Code of Conduct. Guided by this policy, we are committed to conducting business in an environmentally responsible manner and fostering health and safety practices that prevent work-related injuries and illnesses.

While most operations are in office and retail settings, EDOTCO faces higher risks, such as working at height and electrical work. To mitigate this, suppliers comply with our Supplier Code of Conduct, and employees in high-risk roles undergo mandatory training and refresher courses. Digital systems help monitor risks, accidents and safety performance across OpCos.

Number of Work Related Fatalities	Lost Time Incident Rate (LTIR)	Number of Employees Trained on Health and Safety Standards
1	0.01	4,486

For more details, please refer to the approved and publicly available HSE policy on the Axiata Website: <https://sustainability.axiata.com/wp-content/uploads/2024/10/Health-Safety-Environment-HSE-Policy.pdf>

OpCos Initiatives

- xl axiata**
 - Strengthened the K3L (Occupational Health, Safety and Environment) culture through competency building, contractor safety management and system execution
 - Conducted Emergency Response Exercises and Medical Check-Ups (MCU) to ensure workplace safety and employee wellbeing
 - Provided personalised health advice through MCU Consultations
 - Organised Health Talkshows and the XLerate Initiative, featuring ergonomic assessments, stretching, sports and health competitions
 - Hosted a Weight Loss Health Talk to promote healthy living among employees

- Dialog**
 - Ensured a safe and compliant workplace through risk management, training, incident prevention and health promotion
 - Maintained compliance through regular legal reviews, ISO audits and periodic inspections
 - Conducted annual and quarterly site visits to assess hazards and escalate issues to key governance bodies
 - Ensured wellbeing through annual check-ups, daily occupational hygiene monitoring and food safety compliance
 - Delivered safety training on electrical, fire, ergonomic safety and inductions for employees and contractors
 - Conducted emergency response plans, training, and mock drills for fire, chemical spills and medical emergencies
 - Achieved zero fatalities and LTIFR in 2024
 - Trained nearly 700 employees through 24 health and safety trainings and multiple safety culture and relief programmes

OpCos Initiatives

- robi**
 - Secured ISO 45001:2018 certification for OHS, becoming the only telecom operator in Bangladesh to achieve this standard
 - Implemented full-fledged safety measures amid the nationwide political unrest to secure 24/7 SoC operations from the Risk and Compliance Officer (RCO) without compromising employee safety and business requirements
 - Executed a high-risk helicopter rescue mission during flash floods, ensuring employee safety and provided the necessary logistical support to safeguard resources in Feni, Noakhali and Comilla districts

- Smart**
 - Participation of 80 employees in the Phnom Penh International Half Marathon in June 2024
 - Reviewed Health and Safety policies and established a new Health and Safety Committee
 - Organised blood donation drives in July and November, involving employees and the public in life-saving efforts

- EDOTCO**
 - 1,196 employees completed health and safety training
 - Implements a comprehensive safety framework through the Hazard Identification, Risk Analysis and Risk Control (HIRARC) process

- linknet**
 - Enhanced workplace safety through structured health and safety training, emergency response and awareness programmes
 - Conducted induction onboarding with refresher floor warden training, firefighting, first aid and ISO 14001 awareness
 - Implemented emergency response drills, including fire and Emergency Response Plan (ERP) office drills, to boost preparedness
 - Strengthened safety awareness through the Santuy (HSE Campaign), fostering a proactive safety culture
 - Achieved zero fatalities and maintained a low LTIFR
 - Conducted MCU to monitor employee health
 - Organised blood donation drives (Gerakan Donor Darah/Donarmas) to support community health
 - Hosted Wellness Day, featuring health talks, Bekal Day, mini MCU and nutritionist consultations
 - Promoted physical activity and engagement through Fun Sport Week
 - Trained over 300 employees on health and safety standards through multiple safety training sessions and drills

- AXIATA DIGITAL LABS**
 - Established HSE Committees across the organisation to strengthen governance
 - Launched an upgraded Incident Management Reporting system (Jira) to improve safety monitoring and response
 - Conducted quarterly HSE inspections, risk management audits and evacuation drills to ensure compliance
 - Provided HSE training to employees to enhance workplace safety awareness and practices
 - Updated safety policies and procedures to align with evolving industry standards
 - Implemented performance monitoring to track and address health and safety incidents
 - Rolled out communication campaigns to reinforce safety culture across the organisation
 - Organised a medical camp and set up a BMI Corner to promote employee health
 - Conducted ergonomic assessments and occupational health checks to support workplace wellbeing
 - Arranged team-building activities to boost morale and overall wellbeing

ADVANCING OUR PEOPLE & COMMUNITIES

COMMUNITY DEVELOPMENT

Why Is This Important

Axiata is committed to creating lasting, positive impacts by understanding local needs and fostering meaningful change through collective action. By engaging communities and stakeholders, we drive long-term sustainable development, enhance quality of life and ensure inclusive growth across the markets we serve.

Our Approach

Community development is driven through Axiata Foundation, Group and OpCos-led initiatives, focusing on Education, Community Investments and Environment. Our programmes empower individuals with digital skills, economic opportunities and environmental awareness, fostering long-term self-sufficiency and drive inclusive progress.

Moving Forward

We remain committed to driving sustainable change through education, as well as equipping individuals and underserved communities with skills for economic independence and sustainability. Through strategic partnerships and scalable initiatives, we focus on measurable impact, ensuring inclusive growth and opportunity for all.

Our Progress

Axiata Foundation

The Axiata Foundation (AF) focuses on Education, Community Investments and Environment to drive digital inclusion, social upliftment and sustainability. Through these pillars, we equip youth with critical skills, enhance livelihoods for underserved communities and promote environmental responsibility, ensuring long-term impact and resilience. We work to develop scalable solutions through collaborations that aim to create lasting, positive change in our communities.



Focus Area	Education	Community Investments	Environment
Impact Objective	Nurture young generation with critical skills to thrive in the digital world	Elevate quality of life for underserved and marginalised communities	Building a healthier planet through educating and collaborating with our youth
Impact Outcome	Advancing critical knowledge and skills	Creating livelihood opportunities	Contribution to planetary health
Amount Invested	RM5.47 million	RM872,000	RM220,000
Number of Direct Beneficiaries	3,368	1,325	126

Contributed a total of RM6.6 million in 2024, enriching the lives of 4,819 individuals across various demographics through Axiata Foundation.

Employee Volunteerism

The Axiata Foundation encourages volunteerism across the Group. These volunteers, from Axiata and its OpCos, are under the volunteerism programme AxiataCares and actively contribute to community initiatives with their time and efforts.

Total Volunteering Hours	Number of Volunteers
-650 hours	142 Malaysians

Nurturing Future Leaders & Providing Quality Education

Axiata Foundation Programmes

Education

- Young CEO Development Programme (YCDP)
- University Leadership Development Programme (ULDP)
- School Leadership Development Programme (SLDP)
- Axiata Digital Leadership Development Programme (for Girls, Youth)
- Axiata EduTuition Programme (Previously Tuisyen Pintar)
- Axiata Digital Certification Programme (ADCP)
- All-Star Bestari Scholarship
- Scholarship for Kolej Yayasan Saad (KYS)
- Back to School

Community Investments

- AF x QSC Outreach Services: Enabling Life Achievement in Rural Sarawak and Orang Asal Students
- AF x Saora Industries: Closing the socioeconomic gap
- AF x Impact Borneo: Empowering Liveability in Rural Sarawak – Socioeconomic Livelihood Project
- Axiata Foundation x Small Changes Malaysia
- AF x Petrosains
- Axiata Foundation x Mental Illness Awareness & Support Association (MIASA)
- Axiata Foundation x Malaysian Relief Agency

Environment

- AF x Green Growth Asia Foundation (GGAF): Eco-Schools Programme Year 2
- Green Wira Programme
- Axiata Foundation x Forest Interactive Foundation: Green Sprout Environmental Education Programme

Making an Impact Through OpCos

OpCos Initiatives



Karuna.lk - Free Online Fundraising Platform

A transparent and accountable platform connecting donors with social causes across healthcare, education, emergency relief and environmental projects.

- Launched 158 new programmes and registered 61 new charities/ organisations
- Raised LKR7.0 million with contributions from 4,300 patrons

Govi Mithuru

Agricultural service supporting 1.1 million Sri Lankan farmers, covering 50% of the country's farming population.

- Provided guidance on 35 crops to improve yields, with 100,000 new farmers joined in 2024, further expanding its reach and impact

ADVANCING OUR PEOPLE & COMMUNITIES

Our Progress (cont'd)

OpCos Initiatives

**Disaster Preparedness**

Strengthened disaster response efforts through early warnings, emergency communication and support for at-risk communities.

- DEWN app provided critical early warnings
- Sayuru, a Fishermen Safety Service, supported > 107,000 day boat fishermen, with 34,000 new users added in 2024

Education Initiatives

In partnership with the Ministry of Education, Dialog Foundation expanded educational access through Nenasa TV and scholarship programmes.

- Nenasa TV reached > 2,500 schools and 1.7 million households via free DTV access
- Awarded LKR6.0 million to 103 students in 2024 including 84 new recipients through Merit Scholarship Programme
- Disbursed LKR130.0 million to > 1,100 scholars since 2003
- Awarded over LKR10.5 million in scholarships to over 250 children affected by crisis in 2024.

Yeheli.lk

A platform offering expert advice on mental health reproductive health, general health and legal matters.

- Recorded 65,102 visitors and 73,372 sessions with the most common inquiries focused on women's health (menstrual health) and mental health

**Haate Kolome**

A free e-learning programme offering skills training to empower the unemployed.

- Reached almost 500,000 people who have watched over 800,000 videos for nearly 16,000 hours on YouTube
- More than 10,000 people have learned new skills through it

Flood Relief Support

- Robi aided communities affected by floods in Noakhali and Feni by distributing over 10,000 aid packages and set up medical camps that helped about 400 people each day

**SmartStart Unipreneur Learning Platform (ULP)**

SmartStart ULP equips young Cambodians with entrepreneurial skills through an interactive online platform integrated into university curricula. In 2024, Smart Axiata, Impact Hub Phnom Penh and 16 universities formalised a partnership to expand access, culminating in the SmartStart ULP National Hackathon in Siem Reap.

- Benefitted 1,330 students, trained 35 lecturers to deliver the curriculum and conducted 14 pitch events across universities

OpCos Initiatives

SmartStart ULP National Student Hackathon

Engaged 16 teams from 16 universities to develop tech business solutions. This initiative fosters

innovation, entrepreneurship and youth empowerment, equipping students with 21st-century skills for global competitiveness.

Techno Pre-Incubation Programme 2024

Hosted at the Institute of Technology of Cambodia (ITC) to drive innovation, entrepreneurship and digital education.

- 26 teams (125 participants) competed
- Top eight teams were awarded USD500 each to support their startups
- 125 beneficiaries engaged in the programme

Mobile Communications and Health

Leveraged its telecommunications platform to drive public health awareness and social wellbeing in partnership with the Telecommunication Regulator of Cambodia (TRC). Supported nationwide campaigns to educate communities on drug prevention and HIV awareness by utilising our network to disseminate critical health messages.

- Distributed > 79.9 million SMS to raise awareness on drug prevention and > 82.5 million SMS to promote HIV awareness and prevention
- Continue to strengthen the collaboration with TRC to enhance public health education efforts

**Tower2Power: Providing Solar Panels to Underprivileged Community**

- Benefitted 350 individuals
- Recorded 165 voluntary hours

Providing Winter Clothing for Needy People

- Benefitted 100 individuals
- Recorded 4,928 voluntary hours

OHS In School

- Benefitted 975 individuals in schools across 9 countries
- Recorded a total of 80 voluntary hours

**Winning Culture Programme - Empowering Fund 2024**

Integrated Winning Culture initiatives with the Empowering Fund, engaging employees via First Squad Connect

- Raised > IDR300 million for the Empowering Fund

Employees participated in appreciation activities, blood donations, bi-monthly wellness events and sustainability efforts

- Donations made to Yayasan Cinta Anak Bangsa and Yayasan Lindungi Hutan

LINKtoEarth - Mangrove Restoration Initiative

In partnership with Yayasan Lindungi Hutan, > IDR233 million was allocated to plant 3,000 mangrove trees in Pantai Indah Kapuk, North Jakarta, to protect coastal

communities from erosion, stabilise shorelines and reduce flooding risks caused by rising sea levels and extreme weather

**Digital Inclusion: KidsSafe.lk**

Focused on promoting digital safety and literacy among children in Sri Lanka

- Expanded outreach via online resources and school partnerships

Collaborated with internal experts to develop child-friendly digital safety content

- Reached over 6,307 users and 432,054 views

KidsSafe Awareness Sessions

A programme to promote child online safety in local schools

- Established partnership with the National Child Protection Authority (NCPA) of Sri Lanka to better drive local impact

Conducted awareness sessions in schools in partnership with the NCPA reaching nine schools, benefitting 1,863 students

- 156 total volunteering hours contributed

ADVANCING OUR PEOPLE & COMMUNITIES

EMERGENCY DISASTER & RESPONSE

Why Is This Important

Disasters pose significant risks to lives, economies and the environment, making connectivity and communication essential during crises. As a telecommunications and digital business, Axiata plays a critical role in providing information, coordination and support to affected communities. Through preparedness, early warnings and robust infrastructure, we help strengthen disaster response and community resilience.

Our Approach

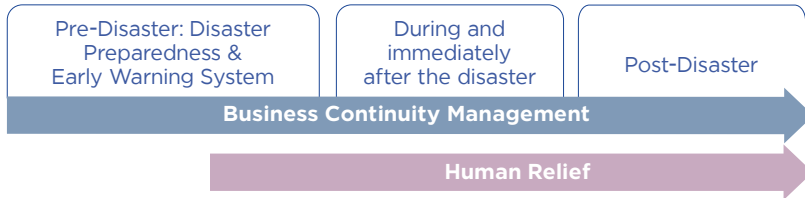
Axiata integrates ISO 22301 principles across OpCos through a robust Business Continuity Management (BCM) Framework, ensuring service continuity during crises. As a GSMA Humanitarian Connectivity Charter signatory, we enhance disaster preparedness, resilience and coordination with governments and NGOs. Through Axiata Foundation's Jalinan Kasih Budi programme and OpCos' initiatives, we provide training for employees and volunteers to strengthen disaster response and humanitarian aid efforts, supporting vulnerable communities.

Moving Forward

We are committed to ensuring uninterrupted service by maintaining reliable connections and providing essential information for effective disaster management. We place a strong emphasis on robust BCM strategies and actively strengthen ties with local disaster agencies, non-profits and government entities.





Our Progress

Comprehensive Disaster Preparedness



Axiata enhances disaster preparedness, response and recovery through risk identification, early warning systems, crisis management plans and regular training. By establishing clear roles, communication protocols and recovery strategies, we minimise disruptions and improve resilience across all OpCos, ensuring continuous readiness and adaptation.

OpCos Disaster Preparedness Efforts

OpCos	Initiatives
	<ul style="list-style-type: none"> Improved BCM measures to ensure sustained business operations while prioritising employee safety during disasters Maintained readiness through the RED protocol, which provides structured guidance following BCM activation to support the public
	<ul style="list-style-type: none"> Continued to support climate resilience for farmers through the Mekong Farm App Implemented Business Continuity Programme (BCP) under ISO 22301:2012, ensuring telecommunications continuity during and after disasters through response plans, resource readiness and disaster recovery simulations
	<ul style="list-style-type: none"> Aligned our Business Continuity Management Framework with ISO 22301 and implemented it consistently across the Group. The Framework undergoes an annual review, with any changes requiring Board approval, and is subject to an annual ISO audit
	<ul style="list-style-type: none"> Successfully completed its first-year ISO 22301:2019 Business Continuity Management Systems (BCMS) audit in 2024 with zero non-conformities Key activities included BIA in full reviews, risk assessments, BCM policy updates, tabletop exercises, call tree drills, internal audits and refresher sessions

DRIVING GOVERNANCE & RISK

What This Means to Us

We are committed to fostering a culture of trust and resilience to navigate an evolving digital landscape while delivering long-term value to customers, shareholders and communities. Our integrity is reflected in robust measures to strengthen cyber security and data protection, ensuring that digital trust remains at the core of our operations. Axiata's dedication to ethical conduct is embedded in our Code of Conduct, which serves as a guiding principle for responsible decision-making and governance across the Group.

Material Matters

1 3 10 14

Prioritised UN SDGs



DIGITAL INTEGRITY

Why Is This Important

The fast-paced evolution of technology, alongside rising cyber threats and tightening regulations, has placed digital trust under pressure. As customers grow more concerned about how their data is handled, especially in the telco and digital space, safeguarding privacy and security has become critical. Preserving this trust is essential for ensuring our long-term relevance and resilience.

Our Approach

As a trusted digital partner, Axiata is committed to safeguarding the data entrusted to us by customers, employees and business partners. With rapid technological advancement and an evolving threat landscape, cyber security risks are becoming more complex, while data privacy remains a key concern for telco and digital customers. Our cyber security and data privacy strategies are anchored in strong governance, integrating preventive, detective and responsive controls. By fostering a culture of responsibility across our operations, we reinforce customer trust and ensure the long-term resilience of our business.

Moving Forward

As we advance our data privacy and cyber security efforts, we remain focused on strengthening governance, enhancing resilience and aligning with global best practices. Our privacy maturity framework continues to evolve, ensuring compliance across all markets, while our cyber security strategy drives the adoption of Zero Trust Architecture and proactive threat detection. Innovation and collaboration remain central to our approach, as we work with governments, industry partners and universities to bolster security capabilities and develop future-ready talent.

[GAFS](#), SORMIC on pages 17 to 25 and Building Digital Trust Through Data Privacy and Cyber Security on pages 29 to 32

Our Progress

Enhancing Cyber-Privacy Integration and Governance

Axiata has strengthened the alignment between cyber security capabilities and privacy objectives by embedding governance, standardising risk reporting and integrating assessments across key functions to enhance oversight, improve risk management and ensure a unified approach to safeguarding digital trust.

Key Enhancements

Stronger Governance and Oversight

- Cyber Security and Data Privacy are now standing agenda items in the Risk and Compliance Committee and Board Risk and Compliance meetings
- Quarterly risk reports are standardised using the Enterprise Risk Framework, with consistent risk appetite statements and Key Risk Indicators (KRIs) for monitoring

Integrated Cyber Security and Privacy Measures

- Cyber Security and Data Privacy teams operate under shared objectives to ensure seamless implementation of Privacy Enhancing Technologies (PETs)
- Asset prioritisation has been expanded to include business, security and data privacy criticality, ensuring protection under a minimum Crown Jewel assessment framework

Unified Risk Assessments and Testing

- Red Team assessments, application penetration testing and supplier security commitments now incorporate both cyber security and data privacy priorities
- Cyber security drills have evolved into integrated Cyber and Data Privacy drills, testing regulatory compliance, security vulnerabilities and privacy risks in a holistic manner

Integrating Data Privacy into DevSecOps and Risk Management

We have progressed in embedding data privacy controls within the DevSecOps framework, strengthening risk assessments and enhancing governance structures to ensure privacy remains a core consideration in digital operations.

Key Highlights

Enhanced DevSecOps for Privacy

Framework now integrates Privacy by Design controls within the development lifecycle, moving beyond post-development compliance.

Stronger Privacy Risk Assessments

Critical Data Flow Diagrams are used to evaluate privacy controls in data collection, processing, retention and transfer.

Refined Risk Management Approach

Cyber Security and Privacy risks are assessed through the Axiata Risk Management Framework, with interrelated risks reviewed at both management and board levels.

Governance and Accountability Strengthened

In most OpCos, the Cyber Security Leads and Data Protection Officer (DPO) teams now report through Risk and Compliance leads to maintain independence, instil a risk-aware culture and enhance cyber security and data privacy maturity.

DRIVING GOVERNANCE & RISK

Our Progress (cont'd)

Data Privacy

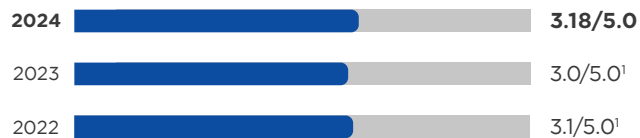
#ASH 3.0 - 2024-2026 Roadmap

Axiata has advanced the #ASH 3.0 roadmap under the themes of Augment, Integrate and Automate, enhancing data privacy maturity, regulatory alignment and risk assessment frameworks across all operating companies.

2024 Progress

- Developed an enhanced Data Privacy Maturity Model, aligned with General Data Protection Regulation (GDPR), NIST Data Privacy Framework, NIST 2.0 Cyber Security Framework, ISO 27701 and British Standards of Personal Information Management Systems
- Conducted a maturity assessment by OpCos, independently validated by KPMG, with maturity scores and roadmaps disseminated to Data Protection Officers (DPOs)
- Implemented the Critical Process Inventory Exercise, refining data flow documentation and strengthening cyber security collaboration
- Developed and adopted templates for Legitimate Interest Assessment, Transfer Impact Assessment, comprehensive Data Privacy officer dashboards and Third-Party Privacy Risk across OpCos, ensuring accurate assessments have been conducted to align with the laws and commit based on the privacy notices
- Conducted awareness workshops and privacy training through Axiata's learning management platform to drive privacy best practices across the Group
- Integrated Digital Rights into document classification aligned with the Information Security Policy, automated across digital and physical documents, with Data Leakage Prevention (DLP) monitored and refined through Zero Trust Architecture KPIs
- The 2024 maturity model was expanded to cover additional domains, risks and regulatory guidelines, resulting in an overall average maturity score of 2.56 out of 5. The Data Privacy Maturity Framework was also completely revamped, aligning with NIST Privacy Framework, ISO 27701, evolving regional laws and stricter measurement criteria. OpCos scored between 2.56 and 3.41, reflecting the more comprehensive and rigorous assessment approach

Aggregate Privacy Maturity Level for Axiata Group



Note: ¹ The assessment for the Privacy Maturity Level is conducted internally based on self-assessment and excludes Boost, ADA, ADL and Link Net

Obtained ISO 27701 certification



Cyber Security

DT&R 2024-2026 Strategy

We progressed the Digital Trust & Resilience (DT&R) 2024-2026 cyber security strategy by optimising investments, leveraging advanced technologies and strengthening partnerships to enhance resilience, operational efficiency, and threat response in an evolving cyber security landscape.

2024 Progress

Zero Trust Framework Implementation

- Operationalised Zero Trust Architecture in 2024 for Application & Workload, Data & Identity, Endpoints and APIs, ensuring controlled access, continuous monitoring and enhanced security of critical assets
- Significantly reduced the risk of unauthorised access and potential data breaches

Enhanced Security Frameworks

- Adoption of NIST 2.0 Cyber Security Framework

Strategic Risk Quantification

- Developed the Risk Quantification Concept Paper to refine risk management practices, with a structured methodology to assess and predict the financial impact of cyber risks and guiding better-informed decision-making

Security Information and Event Management (SIEM) Migration

- 24/7 Security Monitoring and Detection platform is migrated from on-premises solution to cloud solution, aligning with Council for Registered Ethical Security Testers (CREST) Standards. This is one of the largest migrations in the Axiata operation countries and the scope is more than > 9,000 nodes with > 600 detection rules

Aggregate Cyber Security Maturity Level for Axiata Group



2024 NIST Assessment across the Group recorded a maturity of 3.18, though it is not directly comparable to 2023 due to the adoption of the NIST 2.0 Framework and stricter measurement criteria, which resulted in a more rigorous evaluation methodology.

DRIVING GOVERNANCE & RISK

Our Progress (cont'd)

OpCos Initiatives

Data Privacy

- The 3-year data privacy strategy (#ASH 3.0) was adopted throughout the year followed by an independent assessment. The practices across the Group have been aligned with NIST, ISO 27701, BS and country regulatory guidelines
- A critical process inventory programme was initiated to focus on digital assets, particularly concerning the implementation of privacy-enhancing technologies ensuring personal data is processed in accordance with the seven principles of GDPR and relevant country regulations
- Critical systems handling personally identifiable information (PII) were reviewed using a privacy control checklist to ensure the maximum protection of digitally transmitted personal data
- Vendors were prioritised based on a framework developed as part of the new strategy, which included third-party risk assessments that featured 72 assessment criteria across nine domains
- The privacy risk management practices were aligned with the enterprise risk management framework and adhered to industry best practices, allowing us to identify, manage and mitigate data privacy risks effectively

Cyber Security

- Successfully obtained and maintained ISO 27017:2025 for Cloud Services and ISO 27018:2019 for the Protection of Personally Identifiable Information (PII) in the public cloud

- Enhanced security practices across systems and networks through the successful implementation of a Zero Trust Architecture, focusing on data and identity protection, APIs, endpoints, workload and application security
- Maintained Zero Trust security controls as a fundamental aspect of security hygiene across the organisation
- Upgraded cyber security governance and maturity assessments in alignment with the NIST Cybersecurity Framework version 2.0, achieving an end-of-year maturity score of 3.37 out of 5.0. Updated the cyber security policy universe and progressed toward the top 25% NIST maturity benchmark in ASEAN. This included the implementation of Zero Trust principles, self-assessments, data leakage prevention measures and ransomware-protected backups across IT and Telecommunication network
- Improved third-party security standards by leveraging industry-recognised frameworks to assess the digital footprint of vendors and the internal security practices
- Delivered staff training and awareness programmes to strengthen the cyber security culture within the organisation to reflect in every product offering
- Continuously validated the outcomes of security projects through regular audits and assessments

OpCos Initiatives

Data Privacy

- Enhanced threat detection, privacy audits, and training through the internal eLearning platform, optimising data sharing and digitising breach management for faster response
- Completed critical process identification and risk assessment for all processes across Robi and its subsidiaries
- Digitised Data Privacy Impact Assessment

- (DPIA), third-party due diligence and incident management to improve efficiency
- 99.7% of employees have completed data protection training
- Active participation of > 500 employees and major vendors during Robi Data Privacy & Integrity Day 2024, fostering collaboration across Robi, RedDot, AxEnTec and r-ventures.

Data Privacy

- Implemented Data Privacy initiatives under #ASH 3.0: 2024-2026 under the themes of Augment, Integrate and Automate
- Revamped the Privacy Maturity Framework, aligning with GDPR, regional laws and privacy standards
- Enhanced employee awareness through interactive newsletters and engaged customers via Smart's Facebook page and CSR initiatives to educate youth on data protection
- Aligned Data Subject Rights (DSR) procedures with customer service operations
- Achieved Maturity Level 3.13 based on the KPMG assessment in December 2024
- Implemented PbD to integrate privacy considerations at all stages of data collection and handling
- Performed DPIA across all processes to identify and mitigate privacy risks
- Strengthened Vendor Due Diligence and Assessments to minimise third-party privacy risks
- Embedded privacy and security clauses in contracts, the Employee Code of Conduct, and the Supplier Code of Conduct
- Assessed critical processes and customer-facing applications and maintaining a data inventory
- Enhanced security with DLP, Vulnerability Assessment and Penetration Testing

- (VAPT), backup, access control, patch management, change management and encryption, securing systems from unauthorised access, theft and data breaches

Cyber Security

- Successfully re-certified and transitioned from ISO 27001:2013 to ISO 27001:2022, ensuring compliance for the 2025-2027 period
- Adopted cyber security governance practices in line with the NIST 2.0 Cybersecurity Framework followed by an independent evaluation process by the end of 2024
- Enhanced security measures for digital assets by implementing Zero Trust Architecture controls across key areas, including Data and Identity, API security and Workload & application security, while embedding zero trust principles as standard operational practices
- Strengthened security protocols by putting Minimum Baseline Security Solutions (MBSS) in place and adhering to Center for Internet Security (CIS) hardening guidelines
- Bolstered Threat and Vulnerability Management (TVM) efforts through regular vulnerability assessments, penetration testing, red teaming exercises and phishing simulations

DRIVING GOVERNANCE & RISK

Our Progress (cont'd)

OpCos Initiatives

Cyber Security

- Successfully completed phase one of our 3-year Cyber Security strategy, Digital Trust & Resilience 2026
- Strengthened our differentiated controls over critical assets by migrating to a cloud-native SIEM platform, alongside implementing a vulnerability priority rating for both internal and external scans. This significantly bolstered our cyber security posture and enhanced our resilience against emerging threats
- Conducted our annual cyber drill in collaboration with Axiata, testing our Incident Response Plan (IRP) and associated playbooks across multiple countries
- Launched a third-party risk management (TPRM) programme for our key vendors, assessing their digital footprint regularly and working closely with them to address any identified issues
- Improved mobile device security measures for all staff members
- Upgraded our cyber security maturity assessments to the NIST 2.0 Cybersecurity Framework, demonstrating a maturity level of 3.38 out of 5.0 by the end of 2024

Data Privacy

- Successfully completed Phase 1 of our 3-year Data Privacy Strategy, known as #ASH 3.0 which involved implementing a critical process inventory and regional exposure assessment to assess our key personal data processing activities in alignment with country regulations, GDPR, and industry best practices such as NIST, ISO 27701, and British Standards and compliance of privacy enhancing technologies in our digital assets which process personal data
- As part of this evaluation, the legal foundations for data processing activities were reviewed, and an independent maturity assessment of data privacy practices was conducted. Furthermore, standardised procedures were implemented across the organisation for Legitimate Interest Assessments, Transfer Impact Assessments, TPRM, and risk reporting to ensure timely evaluations are conducted for legal basis for data processing and comply with relevant country regulations

Data Privacy

- Successfully implemented the initiatives outlined in the three-year Data Privacy strategy (#ASH 3.0). Key achievements include the creation of the Data Privacy Maturity Assessment Framework to evaluate and enhance our practices
- Assessed all critical Data Privacy processes against GDPR principles, country-specific regulations and industry standards like NIST and ISO 27701
- We also leveraged IT automation to enhance data privacy efficiency and strengthen cyber security defenses.

Digital rights metrics were integrated into our KPIs, aligned with T.R.U.S.T. principles (Transparency, Rights, Use, Security, Transfer), ensuring compliance and aiming for zero incidents to protect individual rights and foster trust

Cyber Security

- Successfully completed Phase 1 of the 3-year Cyber Security Strategy, "Digital Trust & Resilience 2026," establishing essential security measures
- Implemented Phase 2 of Zero Trust architecture, enhancing access controls

OpCos Initiatives

- and monitoring for all endpoint devices to ensure strict verification of access requests
- Integrated the DevSecOps framework into our software development practices, fostering collaboration between development, security and operations teams for improved application security
- Deployed a Privileged Access Management (PAM) solution to enhance

controls over privileged account access, minimising the risk of unauthorised access

- Adopted the NIST Cybersecurity Framework 2.0, with a maturity assessment planned for the end of 2024 to evaluate the effectiveness of our security controls and drive continuous improvement



- Enhanced API security guidelines that align with Zero Trust Architecture. Additionally, strengthened governance standards and implemented the NIST 2.0 Framework
- Conducted awareness programmes focused on Privacy by Design and Secure Coding Guidelines to enhance Customer Data Privacy in the products
- Reinforced Third-Party Risk Management practices through regular evaluation of the security posture of critical third parties. Timely remediation activities are closely monitored as part of our strategic KPIs

Cyber Security

- Successfully completed the ISO 27001:2022 Surveillance Audit which assures the information security practices across the organisation
- Adopted the NIST 2.0 Cyber Security Framework throughout the organisation and conducted a thorough evaluation of documentation, implementation, effectiveness of controls, automation and review mechanisms across all three markets in which we operate to continue security of information aligned to the latest industry best practices
- Implemented Zero Trust architecture controls across APIs, endpoints, workload and application security, as well as data and identity domains, while maintaining Zero Trust principles as a standard practice in all security operations, which strengthens access to data and detects threats
- Established a range of differentiated controls, including log monitoring, vulnerability assessments, penetration tests, keyword monitoring and brand monitoring over the information assets and external digital footprint to enhance the detection and response capabilities for our most critical assets

Data Privacy

- Implemented ISO 27701:2019 (PIMS) in Sri Lanka and Indonesia to enhance personal data protection practices
- Adopted the Group Data Privacy strategy and successfully completed the initiatives planned for 2024, achieving a maturity level of 3.41 by the end of the year, ensuring the highest standards of data privacy in customer offerings
- Data privacy practices were assessed through various aspects aligned with country regulations and best practices, such as NIST, ISO 27701 and BS 10012 ensuring confidentiality and compliance with legal basis of processing personal data

DRIVING GOVERNANCE & RISK

BUSINESS ETHICS & GOVERNANCE

Why Is This Important

As a Group spanning telecommunications, digital services, banking, fintech and infrastructure, we recognise the risks of bribery and corruption, including loss of trust, financial penalties, regulatory breaches and unsustainable business practices. Ensuring strong ethical governance is essential for long-term stability, investor confidence and the protection of stakeholder interests.

Axiata's Zero Tolerance for Bribery and Corruption is critical to maintaining trust, reputation and regulatory compliance across the diverse markets we operate in.

Our Approach

Axiata governs Compliance, Ethics and Integrity through a Three Lines of Defence model, overseen by the RCMC, with quarterly updates to the BRCC and Board of Directors. To mitigate bribery and corruption risks, the Anti-Bribery and Anti-Corruption (ABAC) Plan 2024-2026 incorporates integrity surveys, effectiveness testing and compliance maturity reviews. Annual key objectives are set based on the ABAC Plan, legal requirements and regulatory expectations, reinforcing Axiata's Zero Tolerance for Bribery and Corruption.

Moving Forward

Under the ABAC Plan 2024-2026, Axiata remains focused on Sustainability and Organisational Culture, reinforcing a strong ethical foundation across its ecosystem. In 2024, emphasis will be placed on embedding a culture of integrity, enhancing awareness and training, and improving reporting mechanisms for greater transparency. To ensure long-term sustainability, compliance efforts will be continuously refined through effectiveness testing, integrity surveys and targeted training for high-risk functions. Axiata will also deepen industry collaboration through engagements with key stakeholders.

Our Progress

Compliance, Ethics and Integrity

Axiata continues to strengthen its compliance culture, enhance governance frameworks and foster industry collaborations to uphold its Zero Tolerance for Bribery and Corruption across the Group.

Key Highlights

Strengthening Compliance Culture

- Mandatory and targeted training for high-risk departments to mitigate bribery and corruption risks
- Integrity Survey conducted Group-wide with 70% participation, focusing on COI
- Dawn Raid training sessions for relevant personnel on regulatory investigations

Governance & Risk Reporting Enhancements

- Half-yearly reporting to MACC on Axiata's Integrity and Governance Unit (IGU) activities
- Group-wide implementation of:
 - ABAC Plan Reporting System
 - Corruption Risk Assessment Reporting System
 - Compliance Monitoring & Evaluation Reporting System
- Updates to the VITAL System to enhance compliance tracking

Industry & Stakeholder Engagements

- Axiata Key Supplier Engagement Forum 2024, in collaboration with Group Sustainability
- Roundtable Compliance Forum with key Malaysian telco organisations, co-hosted with CelcomDigi Berhad
- Knowledge-sharing sessions with PETRONAS Legal & Compliance team
- Corporate membership and engagement with The Malaysian Society for Transparency and Integrity (TI Malaysia)
- Collaborative compliance discussions with Business Integrity Alliance alongside PETRONAS, Khazanah, Shell and SD Guthrie

Strengthening Anti-Bribery and Corruption Practices

Axiata reinforces its ABAC framework by addressing key focus areas from 2023, with a strong emphasis on organisational culture and sustainability. Under the ABAC Plan 2024-2026, efforts have been made to close identified gaps through targeted training, awareness programmes and compliance enhancements.

Key Initiatives in 2024

87.5% training completion for annual Anti-Bribery and Anti-Corruption, Whistleblowing, Data Privacy & Cyber Security

ABAC	<div style="width: 89.5%;"></div>	89.5% [^]
Cyber Security	<div style="width: 87.0%;"></div>	87.0%
Data Privacy	<div style="width: 86.0%;"></div>	86.0%

- COI Focus - Integrated as a focal topic in awareness sessions and communications
- Supplier Engagement Forum - Conducted during Axiata Sustainability Month, bringing key suppliers together to align on ABAC, whistleblowing and global anti-corruption best practices

Enhancements to Mitigate Corruption Risks

- Automated Corruption Risk Assessment - Standardised across the Group to ensure accuracy, consistency and advanced data analytics on corruption risks
- Continuous Compliance Monitoring & Evaluation - Ongoing assessments to identify gaps and areas for improvement
- Integrity Survey 2024 - Focused on COI, assessing employee awareness and identifying areas for strengthening governance
- Automation of ABAC & Compliance Monitoring Reporting - Streamlined tracking of key gaps, trends and recurring issues across the Group

Note: [^] The percentage of employees who have received training on anti-corruption (by employee category) was subjected to external independent limited assurance. Refer to the independent assurance report on pages 149 to 150

DRIVING GOVERNANCE & RISK

Our Progress (cont'd)

2024 Performance

- Due to our robust Speak-Up channel and the training and awareness conducted throughout the year, three cases were brought to our attention, of which, appropriate actions were undertaken
- Training Completion Rate - Achieved 98% against the annual target, reinforcing a culture of integrity and compliance
- Assessments Related to Bribery and Corruption - During the year, more than 80% of our operations were assessed for corruption-related risks

Speaking Up

Axiata's Code of Conduct reinforces the importance of speaking up against unlawful, unethical or non-compliant behaviour. To strengthen this culture, continuous training on whistleblowing was conducted for employees and vendors, ensuring awareness of reporting channels and protection measures.

Anyone connected to Axiata and its subsidiaries can report concerns, including anonymously, through the Axiata Group Speak-Up Channel (<https://axiatagroup.integrityline.com>), managed by an independent external provider and overseen by Axiata Group Internal Audit.

We uphold a strict no-retaliation policy to safeguard individuals reporting in good faith. All reports are thoroughly reviewed, with investigations conducted where necessary, and substantiated cases result in appropriate disciplinary action, including dismissal where warranted.

Anti-Competitive Behaviour

Competition compliance is crucial to maintaining ethical business practices, which all stakeholders must adhere to. As outlined in the Axiata Supplier Code of Conduct, our suppliers and vendors are forbidden from engaging in anti-competitive behaviour.

The Employee Code of Conduct mandates all employees to comply with applicable competition laws and refrain from participating in any activities that may violate these laws.

In general, all Axiata's OpCos, where applicable, adhere to all domestic anti-competition laws, regulations or provisions contained in their respective operation licenses.

Risk Management

Axiata employs a Risk Management framework aligned with ISO 31000:2018, overseen by key management teams throughout the organisation. OpCos adhere to a consistent set of policies and standards, which facilitates measurable risk management aligned with the defined Risk Appetite Statements, ensuring compliance with the organisation's objectives.

The tone set by senior leadership is reinforced through quarterly BRCC and the RCMC meetings, with risk management as a principal agenda item. This standardised approach is implemented across all OpCos and is overseen by the local Enterprise Risk Management (ERM) teams.

All identified risks undergo prompt review and mitigation at their source, or they are escalated to the Group Management Committees for necessary action and subsequent reporting. The ERM teams operate in a second-line defense capacity, engaging collaboratively with the first line to ensure effective risk assessment and mitigation processes are in place.

OpCos Initiatives



- Formed a Disciplinary Committee to ensure fair and consistent enforcement of the Employee Code of Conduct, policies and procedures
- Operationalised Smart Investment Management Committee (SIMC)
- Conducted the Statement of Risk Management and Internal Controls company-wide to assess control adequacy and governance effectiveness
- Defined the 2024-2026 Risk & Compliance strategy
- Updated ABAC governance instruments, including the Employee Code of Conduct, Branding, Advertising, Marketing and Sponsorship (BAMS) and GDS Policy
- Achieved 100% annual COI and Code of Conduct declarations from employees
- Strengthened transparency by updating the Smart corporate governance section on the official website
- Ensured ABAC effectiveness through internal audits, compliance monitoring, integrity surveys and automation of the BAMS checklist
- Established Health and Safety Committee
- Conducted bribery and corruption risk assessment across 273 internal business processes, identifying risks and implementing controls
- Communicated Axiata's zero tolerance for bribery, corruption and money laundering to third parties
- Operationalised the GDS Committee to oversee GDS, BAMS and CSR transactions
- Strengthened the procure-to-pay process with enhanced monitoring of service and goods acceptance
- Strengthened the conflict-of-interest process to improve compliance
- Reinforced tone from the top with a zero tolerance stance on non-compliance
- Enhanced ERM culture by training and upskilling departmental risk champions to improve risk identification and registration
- Integrated ESG into the ERM framework to align with sustainability goals
- Conducted an ERM self-assessment based on Gartner's framework to drive continuous improvement



- At EDOTCO, the Integrity Anti-Corruption Plan (IACP 4.0), was approved by the Board with key ABAC activities planned out for 2024-2026
- The robust compliance programme implemented at EDOTCO was recognised with the "Partnership for the Goals Recognition" award at the UNGCMYB Forward Faster Sustainability Awards 2024, and received the Gold Award at the "Integrity, Governance and Anti-Corruption Award (AIGA)"
- A vendor development programme (VDP) was established for its suppliers and business partners, primarily Malaysian Small and Medium Enterprises (SMEs). One of the dimensions covered in the VDP programme is ESG, which includes topics on ABAC shared with the participants

DRIVING GOVERNANCE & RISK

Our Progress (cont'd)

OpCos Initiatives



- ADL strengthened the risk and governance process within the organisation by formalising a full Risk and Compliance Department; this includes:
 - The establishment of the RCMC and Board Risk & Compliance Committee
 - Key controls such implementation of the ABAC Plan 2024, Corruption Risk Register, High-Risk Transaction review, Global ABAC Audit, Statement on Risk Management and Internal Control (SORMIC) and COI Mandatory Declaration

Human Rights

The value chains of mobile operations involve human rights risks due to the nature of the operations. These risks encompass various issues, such as the treatment and working conditions of workers across the supply chain, the treatment of employees within the company and the protection of customers' rights on the Internet. We are committed to engaging with stakeholders, both internal and external, to identify, assess and address salient human rights issues specific to our operations and industry context.

Tax Transparency

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

Approach to Tax

Axiata's tax approach is governed by the Axiata Group Policies - Taxation Chapter, ensuring compliance with tax laws, regulations and effective tax management across all OpCos. Decision-making thresholds are guided by the Group's and OpCos' Limit of Authorities.

Tax Governance, Control and Risk Management

The key focus areas of tax governance are to ensure compliance with tax laws and mitigate risks. Therefore, effective tax governance involves establishing clear policies, procedures and oversight to manage tax-related activities. This includes assigning responsibilities to various personnel within Axiata to ensure accurate tax returns, timely tax payments and comprehensive tax reporting. All these measures ensure tax transparency, build trust with stakeholders and drive sustainability.

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

In tax management, the OpCo Tax function or the designated tax personnels undertake tax risk assessment to manage tax risk exposures for the legal entities. The tax risk assessment and tax management shall be approved by the OpCo CFOs and is reported to the Group Tax Department.

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

In addition, the Annual Report Management Committee oversees matters related to the IAR while the BSC oversees matters relating to the Sustainability section in the IAR.

Tax Reporting

Axiata discloses its annual taxes and fee contributions by country and OpCo through the National Contribution Report, while tax payments are reflected in the Group Audited Financial Statements. In the year under review, Axiata contributed RM693 million (approximately USD155 million) of tax payments across all operating countries.

Engagement with Tax Authorities

Axiata and its OpCos uphold strict ethical standards when engaging with tax authorities. We refrain from engaging in inaccurate or evasive practices. In cases of unclear tax laws, we seek professional tax advice. Additionally, we actively participate in tax consultations relevant to our business to ensure regulatory alignment and contribute to policy discussions.

GAFS, Audited Financial Statements on pages 44 to 204

DRIVING GOVERNANCE & RISK

REGULATORY AND POLITICAL RISK

Why Is This Important

Regulatory and political changes directly impact Axiata's business viability, competitive edge and long-term growth. Proactively monitoring these shifts enables timely adjustments to management and business strategies, ensuring compliance and operational resilience. Effectively navigating these challenges allows Axiata to adapt to evolving policies, mitigate risks and seize opportunities, strengthening its position in dynamic markets.

Our Approach

- Proactively shape the landscape (external environment) at each OpCo market, enabling proper and effective management of regulatory issues confronting the respective OpCos while ensuring fair and transparent practices of policies
- Uphold Axiata's corporate governance through Axiata Regulatory Compliance Framework
- Develop Group-wide positions on key issues and joint on-ground engagements with OpCos to drive strategic regulatory positions
- Drive thought leadership and active participations in consultations and industry association events, to foster collaboration and knowledge sharing for best industry policies and practices, including with relevant partners such as the ITU and GSMA
- Establish and operationalise Regulatory Expert Working Group for systematic sharing of best practices among OpCos
- Effective oversight and monitoring on major developments and identifications of key challenges; strategise and improve OpCos' agility to respond and adapt to regulatory changes

Moving Forward

Axiata remains committed to navigating evolving regulatory and political landscapes by staying agile and responsive to policy changes across its markets. Key focus areas include:

- Securing timely and affordable spectrum releases for 4G and 5G services and identifying new spectrum bands for the future
- Conducting regular advocacy sessions at regional and national-level regulators' forums and thought leadership events to address issues such as spectrum, 5G licensing, taxation, digital competition, industry sustainability, open access, Network Fair Share and digital policy
- Securing direct engagement with the Malaysian government for Axiata's strategic and investment issues
- De-escalating stringent network QoS requirements in several markets to align with global best practices and socio-economic factors
- Advocate measured and careful retail tariff increases in several markets for market repair adapting to data protection laws to strengthen security and compliance
- Stricter environmental regulations may require the early adoption of energy-efficient technologies and renewable energy investments, ensuring long-term sustainability

IAR, Risks Linked to Strategy on pages 23 to 27, Transparency and Accountability on pages 95 to 129 and Embedding Sustainability Into Our Governance Structures on pages 115 to 116

The Terms of References are available online. Please visit <https://www.axiata.com/our-business/corporate-governance>

Our Progress

Regulatory and Political Risks in 2024

In 2024, Axiata navigated key regulatory and political risks, including spectrum allocation changes in Malaysia and Bangladesh. Political instability in Bangladesh led to regulatory uncertainty, however, the interim government has initiated sectoral reforms to move towards a more efficient industry structure. In Sri Lanka, the regulatory authority enacted new competition rules to govern market competition in the telecom sector. Adapting to these challenges was essential for sustaining competitiveness and long-term growth.

We also monitored risks, including geopolitical tensions and cyber threats, AI-driven cybercrime, evolving regulations, supply chain security vulnerabilities, emerging technologies requiring faster threat detection and cyber skills gaps across sectors.

Performance in 2024

- Strong government support – The government of Malaysia, along with its overseas missions and embassies, provided significant backing. Notably, the YAB Prime Minister officiated the launch of Boost Bank Berhad in June 2024 and supported advocacy efforts related to tax issues in Bangladesh
- Effective engagement – Axiata and its OpCos successfully engaged government policymakers and National Regulatory Authorities on key industry issues such as 5G policy in Cambodia and timing of future spectrum release in Indonesia
- Malaysia – Secured the necessary Cyber Security Service licences from National Cyber Security Agency (NACSA)
- All markets – Prioritised regulatory compliance and risk management, minimising incidences of non-compliance
- Robi acquired an additional 20 MHz of spectrum in the 2.6 GHz band, and in line with industry expectations, the regulatory authority adopted the local currency for spectrum pricing
- Mitigated more punitive regulatory action in several markets including Cambodia, Bangladesh and Sri Lanka
- Industry collaboration – Coordinated advocacy efforts with GSMA and industry associations on spectrum policy, taxation and regulatory costs
- Collaboration with Malaysian government agencies – MoUs on cyber security cooperation signed with MDeC and CyberSecurity Malaysia
- Regulatory Experts Working Group – Brought together regulatory and policy practitioners from OpCos and the Corporate Centre to discuss key topics, including online safety, cyber security, sustainable spectrum costs, spectrum auction game theory, 5G developments, AI policy and network fair contribution

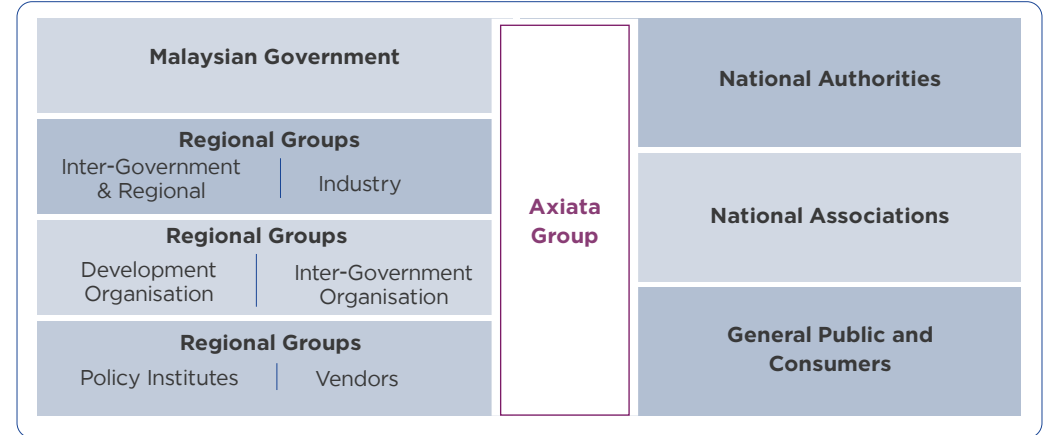
DRIVING GOVERNANCE & RISK

Our Progress (cont'd)

Stakeholder Engagement

Axiata remains committed to proactive engagement with regulators, policymakers and industry players to address compliance challenges and explore strategic opportunities. The Group continues to foster collaborative discussion through engagements with:

- National governments and regulatory authorities to align on industry policies
- Regional and global industry associations to advocate for fair and sustainable regulatory frameworks
- Business and development organisations to support infrastructure growth and digital inclusion.
- Vendors, public policy institutes and the general public to ensure transparent, responsible and consumer-focused operations



DRIVING GOVERNANCE & RISK

SUSTAINABLE SUPPLY CHAIN

Why Is This Important

Axiata's success and growth rely on a sustainable supply chain across our OpCos with suppliers supporting our digital and mobile services. Ensuring service quality, innovation and responsible business practices, we expect suppliers to uphold high ethical standards and integrate EESG considerations. Strengthening sustainability in our supply chain creates positive community impact, enhances supplier resilience and meets stakeholder expectations.

Our Approach

Axiata's diverse supply chain spans across equipment vendors, infrastructure providers and IT service partners, all essential to delivering seamless operations and meeting customer needs. We actively collaborate with our suppliers to build strong, lasting relationships, ensuring supply chain resilience, particularly in challenging times. Our commitment is to maintain uninterrupted operations while supporting our suppliers in meeting evolving business and sustainability expectations. Axiata requires all suppliers to uphold the highest ethical standards, as outlined in our Supplier Code of Conduct (SCOC).

Moving Forward

Supply chain disruptions pose risks to Axiata's core business and operations. To mitigate these challenges, we partner with established suppliers to leverage their scale and enhance supply chain resilience. Our strategy includes collaborating with top regional suppliers and diversifying sourcing locations across stable Asian markets to minimise exposure to geopolitical risks and ensure business continuity.

Our Progress

Supplier Screening

Supplier screening is conducted during onboarding process. Potential suppliers are required to provide relevant information together with supporting documents, and these submissions will undergo a detailed due diligence review.

Supplier Assessment

Evaluating suppliers is essential to ensuring alignment with Axiata's standards, minimising risks and improving supply chain performance. Assessments cover financial stability, operational capabilities, regulatory compliance and quality standards to prevent disruptions. At the Corporate Centre, for instance, ESG criterias are integrated into supplier evaluations, covering environmental impact, safety, carbon emissions and social responsibility. Regular assessments also optimise costs, enhance efficiency and strengthen supplier collaboration for improved business outcomes.

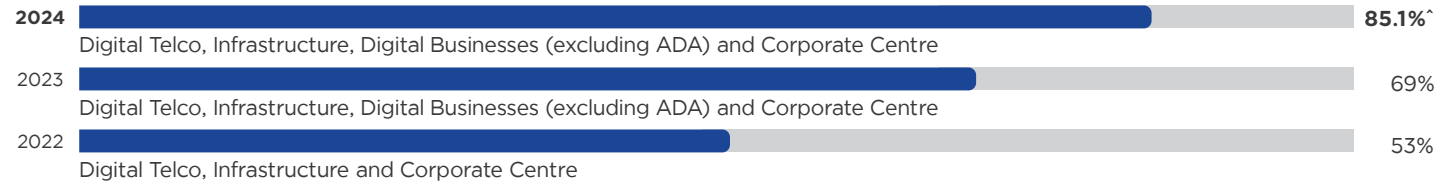
Grievance Mechanism

Axiata provides suppliers with a Speak-Up channel to report Supplier Code of Conduct (SCOC) violations, unethical behaviour or wrongdoing. Our Whistleblowing Policy ensures reports can be submitted without fear of reprisal, with strong protections for whistleblowers and investigators acting in good faith.

Supporting Local Suppliers

Axiata prioritises local suppliers to strengthen economy, diversify procurement and enhance supply chain resilience. We monitor local supplier participation and spending across OpCos, adapting to country-specific definitions and regulations. Supporting local suppliers also drives job creation and socio-economic growth in our operating markets.

Proportion of Spending on Local Suppliers



Note: [^] The proportion of spending on local suppliers was subjected to external independent limited assurance. Refer to the independent assurance report on pages 149 to 150

OpCos

Initiatives



- Organised the Axiata Key Supplier Engagement Forum 2024 in collaboration with Group Sustainability and Group Risk and Compliance, addressing ABAC Compliance
- Integrated an ESG declaration into the evaluation process as part of a supplier due diligence review
- Participated in the Government-Linked Company (GLC)

- Procurement Circle, hosted by Tenaga Nasional Berhad (TNB), where the Axiata Corporate Centre Procurement Head joined Malaysia's GLC procurement leaders for collaboration, and knowledge sharing on sustainable supply chain efforts
- Ongoing discussion on Sustainable Procurement best practices among GLC on due diligence and techno-commercial evaluation



- Enhanced sustainable procurement through regular assessments and audits, focusing on carbon reduction, waste management, and sustainable products in 2024
- Robi's suppliers undergo stringent evaluations to meet sustainability requirements where new suppliers must adhere to

- Robi's SCOC before onboarding, ensuring alignment with ethical and fair labour practices
- Supported local suppliers through training, resources and digital tools via the Supplier Portal, eSourcing Platform and eSign facilities



- Conducted site visits to suppliers' warehouses, production houses and offices to ensure compliance with Cambodia labour law and Smart SCOC, while reinforcing environmental responsibility
- 285 suppliers reviewed and signed the Smart SCOC in 2024
- Reinforced zero tolerance for bribery and corruption, urging suppliers to comply with anti-bribery policies and report violations confidentially

- 265 suppliers completed the pre-third party due diligence assessment, providing insights into their operations and activities
- Sent awareness email to all suppliers on Smart's integrity and transparency policies, including the Speak-Up reporting channel
- Raised awareness of child online protection through targeted communications



- Conducted assessments on data security and privacy standards with ADL's strategic partners
- Identified improvement areas and provided expert guidance to

- enhance operational standards
- Supported partners in advancing from good to great in data security and privacy practices