



AXIATA GROUP BERHAD SUSTAINABILITY POLICY

Date: 26 November 2025

Version: 1.0

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1.0 PURPOSE

- 1.1. The Axiata Group Berhad’s (“Axiata” or “Group”) Sustainability Policy establishes a comprehensive framework for integrating sustainability across all facets of our operations. This policy guides how Axiata addresses Environmental, Social, and Governance (ESG) considerations in alignment with its business objectives, stakeholder expectations, and regulatory requirements, including those set by Bursa Malaysia and the Securities Commission (SC) Malaysia.
- 1.2. The framework spans the entire sustainability lifecycle, from strategic planning and operational execution to monitoring, reporting and continuous improvement, ensuring clear governance, accountability and performance at each stage. Recognising sustainability as a strategic priority, the policy supports the Group’s ambition to transition towards a low-carbon, inclusive, and digitally enabled future. It applies across all Axiata operating companies and business units and is aligned with leading international frameworks and applicable regional standards. By doing so, the policy reinforces Axiata’s commitment to long-term value creation for stakeholders while contributing to national and global sustainable development goals. We are committed to embedding sustainability at the core of our business strategy and operations.

2.0 SCOPE

- 2.1 This Policy applies to:
 - a) All internal stakeholders, including all members of the Axiata Group Berhad’s Board of Directors (“**BOD**”), Board Sustainability Committee (“**BSC**”), Members of the Axiata Group’s senior leadership team, all operating companies (“**OpCos**”) within the Group, all employees at Axiata; and
 - b) All external stakeholders that conduct business with the Group.
- 2.2 The Policy is aligned with Malaysian national regulatory requirements, including Bursa Malaysia’s Sustainability Reporting Guidelines and the Securities Commission Malaysia’s National Sustainability Reporting Framework (“**NSRF**”). It also supports alignment with leading international best practices, such as the Global Reporting Initiative (“**GRI**”), Carbon Disclosure Project (“**CDP**”), and the United Nations Sustainable Development Goals (“**UN SDGs**”). Where applicable, it is further informed by global principles, including the Paris Agreement and the United Nations Global Compact (“**UNGC**”).
- 2.3 This alignment ensures a harmonized and standardized approach to sustainability governance across the Group’s entire footprint, promoting consistency in how material ESG topics are identified, managed, reported, and acted upon at both the Group and OpCo levels. It reinforces a shared commitment to proactively managing ESG risks and opportunities across all facets of the telecommunications value chain, from infrastructure and digital services to supply chain management and customer engagement, thereby strengthening the Group’s long-term resilience and positive societal impact.

Refer Schedule I for a list of Axiata’s stakeholders.

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3.0 MAIN PRINCIPLES AND FRAMEWORKS

3.1 General

3.1.1 The role of Group Sustainability in sustainability strategy setting and planning includes:

- Providing guidance to the Axiata Group on sustainability strategy setting, including emerging ESG trends, stakeholder expectations, and regulatory developments, which includes mandatory sustainability reporting frameworks.
- Aligning and formalising subsidiaries’ sustainability strategies and action plans with Axiata’s overall sustainability vision, commitments, and targets.
- Identifying areas for cross-OpCo synergies, providing guidance and/or recommending remedial actions for material sustainability risks or underperformance.
- Presenting the Group Sustainability Roadmap, annual ESG targets, and consolidated sustainability performance updates to the Sustainability Steering Committee for review, and subsequently to the Board Sustainability Committee for deliberation and approval.

3.2 Guiding Principle

3.2.1 This Policy is anchored in Axiata Group Berhad’s vision, mission, and core values, and is aligned with the mandatory requirements set forth by the Securities Commission Malaysia (SC) and Bursa Malaysia. These requirements, as stipulated in the National Sustainability Reporting Framework (NSRF) and the Bursa’s Listing Requirements, establish minimum standards for public listed companies in Malaysia to disclose material sustainability matters, including Environmental, Social, and Governance (ESG) considerations, in a transparent, accurate, and timely manner. In fulfilling these obligations, the Group also affirms its commitment to internationally recognised frameworks and principles, including:

- **International Financial Reporting Standards (IFRS) Sustainability Disclosure Standards:** IFRS S1 and IFRS S2 – Adoption of IFRS S1 (General Requirements for Disclosure of Sustainability-related Financial Information) and IFRS S2 (Climate-related Disclosures) to ensure that our sustainability reporting is consistent, comparable, and decision-useful for investors and stakeholders, aligned with globally accepted disclosure practices.
- **United Nations Sustainable Development Goals (SDGs)** – Supporting Malaysia’s nation-building agenda by contributing towards an inclusive, equitable, and developed nation with shared prosperity for all.
- **Ten Principles of the United Nations Global Compact (UNGC)** – Upholding environmental responsibility, labour standards, human rights, and anti-corruption principles across the Group’s operations and value chain.
- **Universal Declaration of Human Rights** – Respecting and safeguarding the inherent dignity, rights, and freedoms of all individuals, everywhere.

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- **International Labour Organization Declaration on Fundamental Principles and Rights at Work** – Promoting the elimination of forced or compulsory labour, the abolition of child labour, the eradication of discrimination in employment, and the provision of safe and healthy working conditions.
- **Sustainability Best Practices** – Embedding energy efficiency, resource conservation, environmental stewardship, and social responsibility into our operations to minimise environmental impact and enhance the well-being of the communities we serve.

3.3 Sustainability Framework

The Group’s Sustainability Framework is built on four strategic pillars that collectively support our aspiration to be *The Next Generation Digital Champion*. Each pillar represents a core area of focus in advancing sustainable growth:



- **Advancing Digital Societies** – Enabling individuals, businesses, and communities to thrive in a digitally connected world, fostering innovation, inclusion, and accessibility.
- **Advancing a Green Economy** – Promoting climate action and the transition to a circular economy, driving sustainable practices across markets to safeguard environmental resources.
- **Advancing Our People and Communities** – Creating positive social impact by empowering people, enhancing livelihoods, and supporting inclusive community development.
- **Driving Governance and Risk** – Adopting responsible and transparent practices, ensuring accountability, and managing risks effectively across the value chain.

These pillars are underpinned by our unwavering commitment to **being responsible in everything we do**, guided by the core values of **Uncompromised Integrity** and **Exceptional Performance (UI.EP)**. The framework serves as the foundation for the Group’s approach to value creation and disclosure. It ensures that all strategies, operations, and reporting are aligned with **Economic, Environmental, Social, and Governance (EESG)** principles, enabling us to deliver sustainable progress and long-term value for our stakeholders across Asia.

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4.0 COMMITMENT STATEMENT

4.1 Climate Strategy & Net-Zero Commitments

We are committed to contributing to global climate action by setting science-based targets to reduce greenhouse gas (GHG) emissions across our value chain. Our long-term goal is to achieve net-zero emissions by 2050 or earlier, with interim targets to drive measurable progress. We shall align our climate strategy with the Science Based Targets initiative (SBTi) and regularly assess climate-related risks and opportunities in line with the ISSB IFRS S2 framework.

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	Transform Our Value Chain	Deliver An Inclusive Climate Agenda
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.	Long-term target to reduce absolute scope 3 GHG emissions by 25% by 2030 and 90% by 2050 from a 2022 base year.	Contribute to positive climate action through carbon removal and by enabling avoidance through technology and digitisation.

To achieve this, we are committed to minimising the environmental impact of our operations by continuously improving energy efficiency across our network infrastructure, data centers, and facilities. As part of our decarbonisation strategy, we aim to progressively transition to renewable energy sources through a combination of on-site generation, green energy procurement, and power purchase agreements. We shall adopt energy-efficient technologies, optimise power usage through intelligent network design, and implement best practices to reduce our overall energy footprint in alignment with our climate targets.

4.2 Governance and Anti-Corruption Commitment

Axiata is committed to upholding the highest standards of integrity, transparency, and accountability in all aspects of our business. We adopt a zero-tolerance approach towards bribery, corruption, and any form of unethical conduct. To reinforce this commitment, we ensure that at least 90% of our employees complete annual training on Anti-Bribery and Anti-Corruption (ABAC), Whistleblowing, Data Privacy, and Cyber Security. This ongoing education strengthens our culture of ethical behaviour, promotes awareness of governance requirements, and safeguards the interests of our stakeholders. *Refer to Schedule III for more information on our commitment on Governance and Anti-Corruption.*

4.3 Cybersecurity and Data Protection Excellence

Axiata is committed to safeguarding our digital infrastructure, protecting stakeholder data, and maintaining resilience against evolving cyber threats. We strive to uphold the highest standards of data privacy, information security, and operational integrity across all markets in which we operate. Our target is to rank among the top 25th percentile in the ASEAN region

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on the National Institute of Standards and Technology (NIST) maturity industry benchmark. Achieving this goal reflects our dedication to continuous improvement, robust governance frameworks, and industry-leading cybersecurity practices that protect our customers, employees, and partners. *Refer to Schedule III for more information on our commitment on Cybersecurity and Data Protection.*

4.4 Diversity and Inclusion in Leadership

Axiata is committed to fostering a diverse, equitable, and inclusive workplace where talent is recognised and rewarded regardless of gender, background, or beliefs. We believe that diverse leadership drives better decision-making, innovation, and sustainable growth. In line with this commitment, we have set a target to achieve 30% women representation in Senior Management across the Group by 2028. This goal reflects our dedication to gender equality, leadership development for women, and creating a corporate culture that empowers all individuals to reach their full potential. *Refer to Schedule III for more information on our commitment on Diversity and Inclusion in Leadership.*

4.5 Reporting & Transparency

We are committed to transparency and integrity in our sustainability disclosures. We shall report our ESG performance in accordance with NSRF by Security Commissions Malaysia, Bursa Sustainability Reporting Guidelines, as well as, recognised global standards, including the Global Reporting Initiative (GRI) and Carbon Disclosure Project (CDP). We shall pursue external assurance of key sustainability metrics to strengthen stakeholder confidence.

4.6 Continuous Review & Benchmarking

We are committed to continuous improvement by regularly reviewing this policy and our ESG performance against industry benchmarks and stakeholder expectations. We shall monitor progress through internal audits, performance dashboards, and external feedback, ensuring that our sustainability practices remain relevant, ambitious, and effective in addressing emerging risks and opportunities.

5.0 GOVERNANCE STRUCTURE AND ROLES AND RESPONSIBILITIES

5.1 The Group’s sustainability governance structure ensures clear oversight, accountability, and effective decision-making in driving ESG commitments. It defines the roles and responsibilities of the Board, management, and relevant committees to ensure that sustainability is integrated into strategic planning, operations, and reporting.

5.2 This Policy is a matter reserved for the Board of Directors, which has ultimate responsibility for approving and overseeing its implementation.

Refer to Schedule II for a detailed sustainability governance structure, including the specific roles and responsibilities of various governance bodies and functional units.

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6.0 REPORTING AND MONITORING MECHANISMS

- 6.1 Axiata shall publish an Annual Sustainability Report in line with the regulations, frameworks, and standards referenced in Clause 3.2. This report is integrated into the Integrated Annual Report, in accordance with Bursa Malaysia’s listing requirements.
- 6.2 The Group shall maintain a quarterly reporting cycle to ensure timely compliance with both internal and external reporting obligations.
- 6.3 The Group shall monitor its progress against defined sustainability objectives through consistent data collection, analysis, and reporting on key performance indicators across the OpCos.
- 6.4 Internal audits and external assurance shall be conducted periodically to verify the credibility, accuracy, and reliability of sustainability data and disclosures.

7.0 REVIEW AND UPDATES

- 7.1 This Policy shall be reviewed and updated periodically, or as required, to maintain its relevance, accuracy, and effectiveness.

8.0 COMMUNICATION AND TRAINING

- 8.1 This Policy shall be communicated to all internal and external stakeholders directly involved in the Group’s operations.
- 8.2 Employees shall receive training to ensure they understand their roles and responsibilities in implementing and upholding this Policy.

9.0 CONTINUOUS IMPROVEMENT

- 9.1 The Group is committed to continuous improvement in sustainability performance and reporting, regularly reviewing policies, practices, and outcomes to identify opportunities for enhancement.
- 9.2 This Policy serves as a guiding framework for the Group’s sustainability journey, recognising that sustainability is a dynamic, evolving process requiring ongoing commitment and innovation.

11.0 REVISION LOG

EFFECTIVE FROM	REVISION CATEGORY (NEW / UPDATED)	DESCRIPTION OF KEY REVISION
26 November 2025	New	

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SCHEDULE I: LIST OF AXIATA’S STAKEHOLDERS

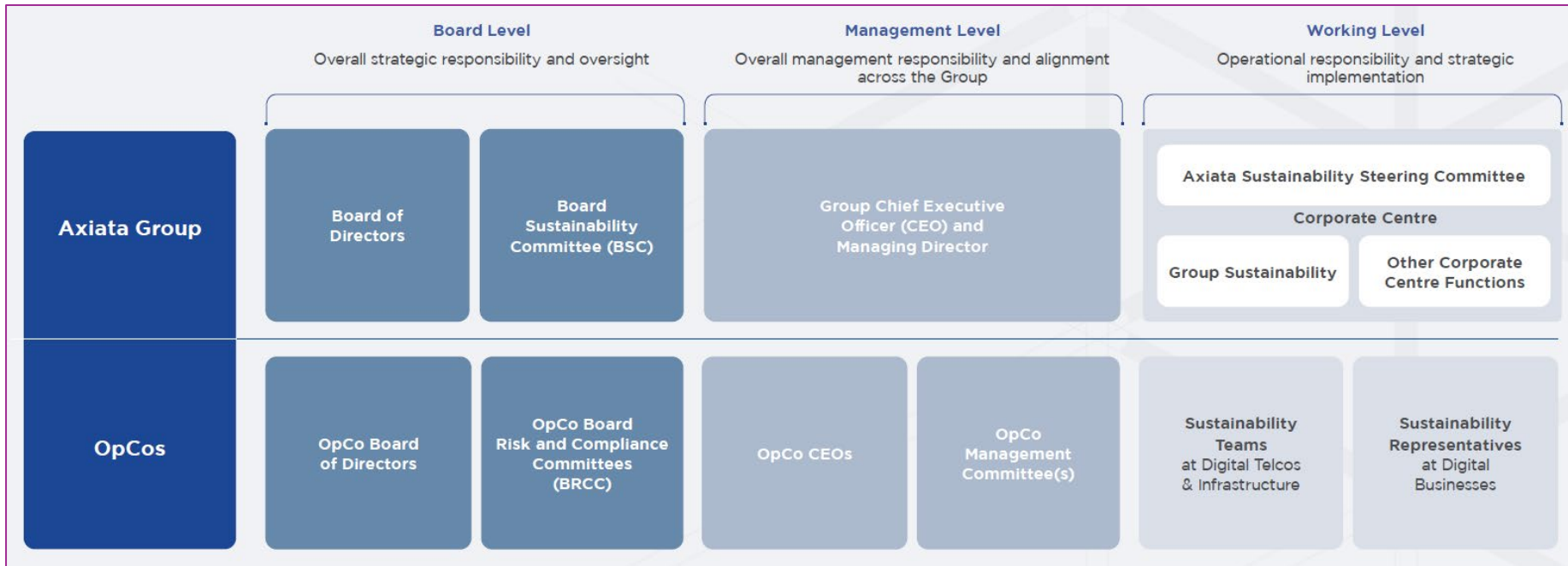
Stakeholder Group	Description
Shareholders, Investors, Analyst	Individuals and institutional investors with a financial interest in Axiata’s performance, growth, and long-term value creation.
Employees	Axiata’s workforce across all operating companies, functions, and geographies, including full-time, part-time, and contract staff.
Customers	Mobile network operators, enterprise clients, and other customers who use Axiata’s telecommunications, digital, and infrastructure services.
Suppliers and Business Partners	Vendors, service providers, and strategic partners who deliver goods, solutions, and services critical to Axiata’s operations and value chain.
Regulators and Government	Government agencies, regulatory authorities, and industry bodies overseeing telecommunications, digital services, environmental compliance, and corporate governance.
Local Community	Individuals, community groups, and local institutions in the areas where Axiata operates, whose livelihoods and environments may be impacted by the Group’s activities.
Civil Society Organisations (CSO)	Organisations that promote environmental protection, social welfare, human rights, and governance best practices relevant to Axiata’s business.
Media	News agencies, journalists, and media platforms that communicate Axiata’s activities, performance, and industry developments to the public.
Industry Bodies	Other companies, alliances, and industry associations within the telecommunications, technology, and infrastructure sectors.
Management & Board	The Board of Directors holds ultimate responsibility for providing strategic oversight and ensuring accountability for Axiata’s sustainability commitments. Management is tasked with operationalising these directives through effective policies, programmes, and risk management.

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SCHEDULE II: SUSTAINABILITY GOVERNANCE STRUCTURE



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Axiata Group Berhad		
Board Level	Board of Directors	Axiata’s Board holds ultimate responsibility over the Group’s sustainability agenda and provides oversight of the integration of ESG matters in Axiata’s corporate strategy with the aim of balancing stakeholder interests while ensuring that we grow responsibly and create long-term value.
	Board Sustainability Committee	The Board Sustainability Committee (BSC) provides strategic guidance to the Group and resolves matters relating to sustainability practices, including climate change-related matters, as well as the preparation of the Group’s sustainability-related disclosures within the Integrated Annual Report.
Management Level	GCEO and Managing Director	The GCEO and Managing Director is responsible for overall management on sustainability-related matters and also oversees Group Sustainability, while being supported by other senior management members within their areas of responsibility.
Working Level	Sustainability Steering Committee	<ol style="list-style-type: none"> 1. Chaired by the GCEO and Managing Director, the Axiata Sustainability Steering Committee (Steering Committee) consists of representatives from Group Sustainability, OpCo Sustainability teams and representatives, and selected Heads or nominees from key Group corporate functions. 2. The Steering Committee is responsible for supporting the management of ESG matters and ensures collaboration to streamline the approach within the Group to achieve Axiata’s sustainability agenda and promote sharing. 3. Group Sustainability leads the development of the overall strategy and framework to drive sustainability initiatives and programmes across the Group in a structured and cohesive way.

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OpCos		
Board Level		<ol style="list-style-type: none"> 1. On all OpCo Boards and OpCo. Board Committees (specifically OpCo. BRCC), Axiata is represented by its Directors or Senior Leadership representatives. This enables alignment and oversight from the Group to OpCos, including ensuring the integration of sustainability across the organisation. 2. Each OpCo has its own sustainability governance, where sustainability-related matters are elevated to OpCo Board, OpCo. Board Committee (specifically OpCo. BRCC), CEO or Management Committees by Sustainability Teams or representatives. 3. We leverage on the OpCo. BRCC to promote accountability and ensure strategic alignment throughout the OpCos. With guidance and support from OpCo BRCCs, the BSC was able to support the Group’s and OpCo’s sustainability agenda including compliance with ESG-related regulatory requirements.

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SCHEDULE III: ACCOMPANYING DOCUMENTS AND DISCLOSURES

No	Accompanying Documents and Disclosures	Link
1	Anti-Bribery and Anti-Corruption (ABAC) Policy Statement	https://www.axiata.com/media/w3sju01b/abac-policy-statement.pdf
2	Anti-Bribery and Anti-Corruption (ABAC) Policy	https://www.axiata.com/media/xh2fxeuz/axiata-group-abac-policy-27112024.pdf
3	Group Whistleblowing / Speaking Up Policy And Procedures	https://www.axiata.com/media/ocim2occ/whistleblowing_policy_procedures_may2025.pdf
4	Axiata Group Berhad Code of Conduct	https://www.axiata.com/media/acojfo5y/employees-code-of-conduct-27-08-2025.pdf
5	Axiata Data Privacy Policy	https://www.axiata.com/digital-trust/integrating-data-privacy-into-business-operations
6	Axiata Privacy Notice	https://www.axiata.com/privacy-notice
7	Axiata Supplier Code of Conduct	https://www.axiata.com/media/bydftqyi/axiata-supplier-code-of-conduct_version-5_01aug2025.pdf
8	Health, Safety & Environment (HSE) Policy	https://www.axiata.com/media/ysofndom/health-safety-environment-hse-policy.pdf

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