



AXIATA GROUP BERHAD

CODE OF CONDUCT

Duly approved and adopted by the Board of Directors of Axiata Group Berhad at the Board of Directors Meeting [No. 07-09] held on 26 August 2009.

PURPOSE OF THE CODE

This Code of Conduct (Code) shall serve as documentation of the Axiata Group's commitment to conduct its operations in a manner that is efficient, effective and fair. This Code is meant as a reference for all levels of employees of the Group consisting of the Axiata Corporate Centre, edotco Group, Axiata digital services and all Operating Companies (OpCo's).

It is a guide to assist the Company's employees to live up to the Axiata Group's core values of Uncompromising Integrity and Exceptional Performance and it provides guidance on employees conduct when dealing with other parties in carrying out the duties for the Company. It also provides guidelines for the manner employees should conduct themselves at the work place, while performing their daily duties for the Company.

The Code is a guide that highlights key issues and identifies the relevant policies and procedures to help and it is not a comprehensive manual that covers every ethical situation employees may encounter during the course of their work.

1. MAIN PRINCIPLES

1.1 SCOPE

- 1.1.1 This policy covers the requirements of employees' conduct at the workplace, the usage and safeguarding of the company's assets, business conduct when dealing with external parties, conflicts of interest and reporting of violations of the Code.
- 1.1.2 For the purpose of the Code, "Company" would be used in reference to the primary entity the employee is attached to at a given date. "Group" would refer to the entire Axiata Group of Companies

1.2 GENERAL

- 1.2.1 This Code applies to all employees for both on and off the job, subject to the local laws and regulations of the countries of operation. It sets out minimum requirements, which shall be complied with, unless doing so violates the local laws and regulations.
- 1.2.2 This Code is a reflection of the core values of the Axiata Group of Companies. Employees are expected to embrace the principles set out in this Code in their daily activities as an expression of each employee's commitment and personal responsibility to uphold the core values. This involves making decisions consistent with the core values, acting ethically in all instances and complying with relevant and applicable laws.
- 1.2.3 While this Code provides a broad range of guidance on the standards of integrity and business conduct expected of the employees, it is not meant to cover all possible situations that may occur. It is designed to provide a frame of reference and guidelines against which employees must use to assess any activity, situation or circumstance, with the view to prevent employees from placing themselves in situations or circumstances that can or may rise questions on the integrity of the employees.

- 1.2.4 Employees shall seek guidance from the relevant division/function in their Company when in doubt about the proper course of action to be taken in a given situation. To supplement this Code and to provide employees with additional guidance reference, the Code of Conduct (link) shall be developed. The Code of Conduct guide will be developed based on the Code, applicable laws and regulations within country of operation in addition to any Company specific values or practices.

1.3 RESPONSIBILITY AND ACCOUNTABILITY

- 1.3.1 Employees: All employees are to comply with this Code and unawareness of the existence of this Code will not be accepted as an excuse for its breach. The Company will require all employees to sign a declaration and to participate yearly in the Code of Conduct communication which will be continuously updated to meet the Company's business requirements.
- 1.3.2 Managers have the added responsibility to set a good example and to lead the employees under their supervision in the application of the Code in their daily business conduct. They are also responsible for promoting open and honest two-way communication to facilitate discussions that may occur in situations where the application of the Code may not be so clear. Managers should diligently be on the lookout for indications that unethical or illegal business conduct has occurred.
- 1.3.3 For the purposes of this Code, "Managers" include people managers, line managers and persons having management responsibility.

2. EMPLOYEE CONDUCT

2.1 GENERAL REQUIREMENTS

- 2.1.1 Employee conduct relates to the conduct of employees both on and off the job, where such conduct must not adversely affect the performance of the employee, or that of other employees, or the legitimate business interests of the company.
- 2.1.2 Employees shall observe the guidelines set out in this Code and exercise good judgement in decision making and actions to maintain the company's reputation for integrity and business ethics.
- 2.1.3 Employees must
- Consider the interest of the company when making decisions that will impact the company and not based on personal gains or favours.
 - Utilise the company's assets for business purposes only and not for personal gains.
 - Declare the employee's assets and / or liabilities with any form of business interest at the point of entry into the company.
 - Declare all business intentions and obtain written approval before participating in such business opportunities, in whatsoever capacity.
 - The company reserves the right to approve or disapprove the employee's involvement in other business activities.
 - Any deviation of the above mentioned conditions must be reverted to the relevant function in the Company for review and further communication.

2.2 WORKPLACE ENVIRONMENT

- 2.2.1 Employees shall strive to maintain a healthy, safe and productive work environment which is free from discrimination or harassment based on race, religion, political opinion, membership in political group, gender, sexual orientation, marital status, national origin, disability, age or other factors that are unrelated to the Company's legitimate business interests.
- 2.2.2 Employees shall avoid any conduct in the workplace that creates, encourages or permits an offensive, intimidating or inappropriate work environment including, but not limited to:
- Threats or comments that contain discriminatory or harassment elements;
 - Unwelcome sexual advances;
 - Violent behaviour or actions;
 - Misuse or abuse of position of authority;
 - Inappropriate dressing in violation of the dress code of the Company;
 - Possession of weapons of any type; or
 - Use, possession, distribution or sale of illegal drugs, alcohol or any prohibited substance, except for approved medical purposes. The consumption of alcoholic beverages on company premises is only permitted for company- sponsored events and with prior management approval.
- 2.2.3 Employees shall not engage or be involved in any immoral behaviour and activities such as gambling, indecency, obscenity, vulgarity or vices in company businesses, in company premises or using company assets.

2.3 WORKING ATTITUDE

The Axiata Group's core values of Uncompromising Integrity and Exceptional Performance along with the Company's additional values, guide our employees' day-to-day actions. Employees should strive to adopt the following attitudes aligned with the two values:

- To be honest so that others can trust our employees to be truthful and not misleading
- To be fair towards everyone regardless of status or personal relationship
- To safeguard the interest of the company
- To comply with the laws, regulations and policies governing the business
- To have zero tolerance towards corruption in any form
- To demand high levels of performance from self and others, whilst being compassionate toward people
- To benchmark one's performance rigorously with the very best and strive to improve oneself.
- To challenge the status quo and to embrace change to make things better
- To be accountable for one's performance and make no excuses for self
- To be determined to win and take pride in winning together with others as a team.

2.4 USE OF RESOURCES AND PROTECTION OF COMPANY'S ASSETS

- 2.4.1 Employees are provided with a variety of resources and access to assets of the Company, regardless of the condition of value, assets belonging to the Company shall not be misused, taken, sold, lent, given away or otherwise disposed of, or used for personal purposes to the extent that it would affect the interest of the Company.

- 2.4.2 Employees shall be personally responsible for protecting the Company's assets entrusted to them. Employees shall take all necessary steps to prevent theft, loss, damage to or misuse of assets belonging to the Company, the occurrence of which shall be reported immediately to the relevant personnel in the company.
- 2.4.3 The types of asset shall be protected and the responsibilities of employees are:
- 2.4.3.1 Physical Assets such as equipment, systems, facilities, supplies, etc shall be used only for conducting the Company's business or for purposes authorized by management. They shall not be used for employees' personal activities.
- 2.4.3.2 Information and Communication Systems including connections to the internet shall be used for conducting the Company's business or for other incidental purposes authorized by the management of the Company. It is inappropriate to use them in a manner that interferes with employees' productivity.
- 2.4.3.3 Proprietary Information where all information (whether in written or oral form and whether on paper or electronic form) relating to technical, product and services, financial data and projections, marketing strategies and business plans, organizational and personnel information, decisions by the Company's board of directors, trade secrets, pricing guidelines, methodology or prices of products and services, profit sharing arrangements, customer information, databases, records and any non-published financial or other data that is not public information or if known will have an adverse effect on the Company. Such information is the result of the innovation, ideas and hard work of employees and of substantial investments in planning, research and development. It is critical that employees treat such information as confidential in accordance with the requirements of Company's policies and take all necessary safeguards to protect this information. The Company's ownership of such proprietary information shall continue even after the employee leaves the Company.
- 2.4.3.4 Intellectual Property Rights where all ideas, inventions or copyright produced by employees as a result of the work performed for or on behalf of the Company in the course of employment, whether that product is protectable or otherwise. Employees shall understand their responsibility to protect the Company's intellectual property and seek advice from the Relevant Authority when in doubt of their obligation in this regard. The Company's ownership of such intellectual property shall continue even after the employee leaves the Company.
- 2.4.3.5 Employees are not allowed to use the Company's assets including equipment, resources and proprietary information for any non-Company related work. Additionally, employees are not permitted to perform non-Company related work or solicit such business on the Company's premises or while working on the Company's time
- 2.4.3.6 Employees shall return all the Company's assets entrusted to them upon cessation of their employment including documents which contain the Company's proprietary information. Additionally, they may not disclose or use the Company's proprietary or confidential information.

2.5 COMPLIANCE WITH ENVIRONMENT LAWS & SAFETY HEALTH PRACTICES

- 2.5.1 The Company is in strict compliance to applicable laws and regulations (of each OpCo country) concerning environment conservation and Occupational Safety and Health. The applicability or meaning of a particular environmental, health or safety regulation, should be clarified with the relevant personnel mentioned in the Code of Conduct guide. Any accident, injury, use of unsafe equipment or unsafe condition can be reported immediately to a designated person.

2.6 DATA INTEGRITY AND DATA RETENTION

- 2.6.1 Employees shall record and report all information accurately and with integrity.
- 2.6.2 Records shall be managed securely in line with their importance and in compliance with legal, tax, regulatory, accounting and other business retention requirements as required by the laws in the Country and also in accordance with the requirements of the Legal policy.

2.7 NON DISCRIMINATION

- 2.7.1 All employees, officers and management should respect the rights and cultural differences of other individuals in the Company. The Company is an equal opportunity employer and will not discriminate against any employee or applicant because of race, age, sex, religion, caste, marital status and disability.
- 2.7.2 This policy applies to all terms and conditions of employment, including, but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, leave of absence, compensation and training. Discrimination and prejudice constitute unacceptable behavior within the Company's premises.

2.8 HARRASMENT

- 2.8.1 The Company is committed to maintaining a work environment that is free of any form of harassment, on the basis of any legally protected status. Employees shall avoid any behavior or conduct that could reasonably be interpreted as harassment.
- 2.8.2 The conduct unaccepted by this Code includes all conduct, whether verbal, physical or visual, that is based upon a person's protected status under law, such as sex, race, ancestry, religion, caste, national origin, age, disability, medical condition, marital status, veteran status, citizenship status, sexual orientation or other protected group status, or upon the protected status of the person's relatives, friends or associates. The conduct includes epithets, slurs, negative stereotyping or intimidating acts that are based on a person's protected status. It also includes written or graphic materials exhibited in workspaces. Employees should be aware and are requested to abide by the strict guidelines further elaborated in the Code of Conduct guide.
- 2.8.3 The Code of Conduct guide further elaborates Company's strict stance with regards to sexual harassment. All forms of sexual advances, requests for sexual favours and other verbal or physical conduct of a sexual nature not only when the conduct is made as a condition of employment, but also when the conduct creates an intimidating, hostile or offensive working environment is prohibited.
- 2.8.4 Employees are encouraged to immediately report if any act which is inconsistent with Code is experienced or witnessed. The Code of Conduct guide specifies personnel the employees could reach in such instances.

3. BUSINESS CONDUCT

3.1 GENERAL REQUIREMENTS

- 3.1.1 Business conduct relates to the conduct of employees while engaged in business dealings for or on behalf of the company, be it buying, selling or representing the company in any capacity.
- 3.1.2 Employees must be ethical and lawful in all of their business dealings. They must be aware of, and adhere to, the relevant laws and regulations governing relations with external parties in the country they operate in.

3.1.3 DEALING WITH EXTERNAL PARTIES

- 3.1.3.1 External parties comprise all customers, vendors, business partners, governments, investors, media, analysts and others, that have dealings with the company. Employees must constantly evaluate how the business is managed and conducted to better meet the needs and expectations of these parties without compromising the company's objectives and values.
- 3.1.3.2 External parties may also comprise competitors and parties having multiple relationships with the company. It is important that in any business dealings, employees are aware of, and understand each of the relationships involved, and act accordingly.
- 3.1.3.3 In all dealings with external parties, employees must be honest in their communications, and avoid making misrepresentations or misleading statements to anyone.

3.2 DEALING WITH CUSTOMERS

- 3.2.1 Customers must be treated with respect and understanding. Employees must always be flexible in how they approach the changing needs of the customers
- 3.2.2 All customer complaints must be dealt with promptly and fairly to ensure that the image and reputation of the company are constantly maintained at the highest level.

3.3 VENDORS AND BUSINESS PARTNERS

- 3.3.1 The Company shall take a collaborative approach in all their partnerships ensuring that employees address the specific needs of the stakeholders, while offering products, services and solutions.
- 3.3.2 The Company shall conduct business with vendors or business partners that share the same ethical commitment as the Company, and shall avoid conducting business with vendors or business partners who are likely to harm the Company's reputation.
- 3.3.3 All vendors/business partners would be subject to the relevant vendor Code of Conduct document as instructed in the Code of Conduct. Employees dealing with external parties need to be familiar with the overall requirements the vendors/business partners need to adhere to, in order to maintain the Company's standards and reputation.
- 3.3.4 Facts shall be weighed objectively and impartially to decide on vendors or business partners following the relevant procurement procedure that applies to a particular activity.
- 3.3.5 Employees shall not exert or attempt to exert influence to obtain privilege treatment for any particular vendor. Vendors in competition for contracts with the Company shall at all times be able to have confidence in the integrity of the Company's selection processes.

3.4 GOVERNMENTS

- 3.4.1 Employees shall hold themselves up to the highest standards of conduct and aim to proactively engage with the.
- 3.4.2 Employees shall be aware of and adhere to the relevant laws and regulations pertaining to relations between government employees and customers, suppliers and business partners.
- 3.4.3 Employees shall not provide gifts to government employees or those acting on the government's behalf if doing so violates certain local laws and regulations or could be reasonably construed as an action to seek special favour.

3.5 INVESTORS, MEDIA, ANALYSTS AND OTHERS

- 3.5.1 Any employee approached by investors, prospective investors, media and analysts on confidential information shall refer such requests to the relevant division as instructed in the Code of Conduct Guide.
- 3.5.2 Employees shall also refer any request for information on the Company's business from investigators or law enforcement officials to the relevant unit in the Legal division as instructed in the Code of Conduct Guide.
- 3.5.3 Employees shall not initiate contract with the media and analysis unless it is part of their job responsibilities, and with prior management approval and knowledge. In all instances, employees shall exercise caution in their communication.

3.6 COMPETITORS

- 3.6.1 Employees shall compete fairly and ethically within the framework of applicable competition laws.
- 3.6.2 Employees shall exercise caution in all business contracts and contacts with competitors, suppliers and vendors and seek advice from the relevant unit in the Legal division as instructed in the Code of Conduct Guide. If in doubt whether an action violates any competition laws.
- 3.6.3 Employees shall disassociate themselves and the Company from participation in any possible illegal activity with competitors and avoid communicating sensitive or confidential information which includes pricing policy, contract terms, marketing and product plans and any other proprietary information.
- 3.6.4 Employees shall not use improper or illegal means to acquire a competitor's trade secrets or other confidential information. When working with such information, employees shall use it in the proper context and for legitimate purposes such as to evaluate the merits of the products, services and marketing of the Company. Such information shall only be made available to other employees on a need to know basis.

3.7 AUTHORITY TO MAKE COMMITMENTS

- 3.7.1 Employees are expected to be aware of and adhere to the Company's defined delegation of authority guidelines and processes for key functions and commitments, limits of authority documents and supplementary procedural documents.
- 3.7.2 Commitments that bind the Company shall only be made by employees who are authorized to do so and in accordance with established limits of authority guidelines. It is not acceptable for employees to make any business commitments whether oral or written that contradict established guidelines and which create a new agreement or modify an existing agreement without proper approval consistent with the limits of authority guidelines.

3.8 MISREPRESENTATION OF DATA

- 3.8.1 The Company is intolerant of withholding or misrepresenting data or hiding of relevant facts in a situation. The following will amount to misrepresentation of data: biased results to a certain group of people, especially in a quality control-related scenario;
- 3.8.2 Intentionally making a false oral or written statement in connection with any Company-related work; and intentionally making a false oral or written statement relating to character, qualifications or reputation

3.9 MONEYLAUNDERING

- 3.9.1 Money laundering is the process of concealing the identity of proceeds from unlawful activities to convert "dirty" money to a legitimate source of income or asset. Money laundering is an offence under the applicable laws and regulations in the respective OpCo country.
- 3.9.2 The company does not tolerate any form of money laundering activities. Appropriate measures shall be implemented, including awareness training as part of Code of Conduct training, conduct checks and verifications as necessary to prevent its financial transactions from being used by others to launder money.
- 3.9.3 Employees shall be aware of the applicable anti-money laundering laws and shall seek to ensure they are appropriately and adequately informed of developments in the laws relating to this area.
- 3.9.4 Employees are expected to be mindful of the risk of the Company's business being used for money laundering activities and to raise any suspicious transactions to the relevant person in charge defined in the Code of Conduct Guide.

3.10 BRIBES AND CORRUPTION

- 3.10.1 Employees shall not offer, give, solicit or accept bribes in order to achieve business or personal advantages for themselves or others or engage in any transaction that can be construed as having contravened the anti-corruption laws.
- 3.10.2 Employees shall be cognizant of the fact that bribes may be in any form, monetary or otherwise including but are not limited to unauthorized remuneration such as referral fee, commission or other similar compensation, material goods, services, gifts, business amenities, premiums or discounts of an inappropriate value or of an unreasonable level or that are not generally offered to others or that are prohibited by law or may reasonably be viewed as having crossed the boundaries of ethical and lawful business practice.

- 3.10.3 Prior to giving or accepting any business amenity or other gifts (in whatever form or value), employees shall assess the appropriateness of their actions by assessing if the action could influence or could reasonably give the appearance of influencing the business relationship of the Company with that organization or individual or any business decision arising out of that business relationship.

3.11 GIFTS, ENTERTAINMENT AND OTHERS

- 3.11.1 As a general rule, employees are discouraged from giving or accepting gifts, entertainment and other benefits to or from business partners. Notwithstanding this, the Company recognizes that the occasional acceptance or offer of modest gifts and entertainment may be a legitimate contribution to good business relationships.
- 3.11.2 Generally, all invitations to business luncheons or dinners may be given or accepted by the employees. Employees receiving or giving the gifts, entertainment and other benefits is responsible for assessing whether it is appropriate and within the boundaries set out in this Code. The following rules and guidelines shall be observed:
 - 3.11.2.1 The purpose of the gifts, entertainment and other benefits shall never be to influence business decision-making processes or cause others to perceive an influence.
 - 3.11.2.2 The situation in which the gifts, entertainment and other benefits is received or given shall not be in connection with contractual negotiations of similar situations.
 - 3.11.2.3 Subject to the above guidelines, where the value of the gifts, entertainment and other benefits received exceed the monetary threshold mentioned in the Code of Conduct Guide, employees shall declare the gift, entertainment and other benefits received as indicated in the Code of Conduct Guide.
 - 3.11.2.4 Such gifts declared shall be deemed to be the Company's assets and shall be treated in accordance to the guidelines set out in section "Employee Conduct".
- 3.11.3 Members of the Senior Leadership Team (SLT) or Heads of Department are prohibited from accepting any form of transportation and lodging provided by suppliers or other third parties. Employees should always be guided by the Code of Conduct Guide in such occasions they receive any form of transportation or lodging assistance from a third party.

4. CONFLICT OF INTEREST

4.1 GENERAL REQUIREMENTS

- 4.1.1 Employees shall be aware that they are at all times employees of the Axiata or any subsidiary of the Group, both on and off the job, and that they owe their loyalty to the Group. Accordingly, employees shall not engage in any activity or advance their personal interests at the expense of the Company's interests. Employees shall avoid all situations where their loyalty may be divided.
- 4.1.2 All employees shall be alert to potential and perceived conflicts of interest situations and shall diligently assess and avoid such activity or situation. Such situations may involve or could arise as a result of family relationships or interactions with close friends. Where any actual, potential or perceived conflict exists, the employee in question is required to inform the respective superiors and seek direction as specified in the Code of Conduct on how to address or resolve the conflict in a fair manner.
- 4.1.3 The common types of conflicts and requirements are addressed below (2.4.2 to 2.4.8) to provide guidance for employees to make informed decisions.

4.2 COMPETING AGAINST AXIATA GROUP

4.2.1 Employees shall not engage in activities that have conflict with the business interests, even in their own time, including commercially marketing products or services in competition with the current or potential offerings of the Axiata Group.

4.2.2 Employees are not allowed to provide any form of assistance to organizations that market products or services in competition with the Axiata Group regardless if they receive any direct or indirect remuneration of any kind for the assistance provided. Accordingly, employees shall not work for the competing organization in any capacity as an employee, consultant or as a member of its board of directors.

4.3 SUPPLYING TO AXIATA GROUP

4.3.1 Employees shall not supply to the Company, represent a supplier, work for a supplier or be a member of the supplier's board of directors during employment with the Company. The Code of Conduct Guide specifies any such exclusions possible to this clause in specific circumstances.

4.4 INSIDER TRADING

4.4.1 Employees who are in the possession of market sensitive information are not allowed to trade in securities of the Company or the shares of another listed company if that information has not been made public. In the context of the laws and regulations prevailing in the country of operation or relevant country depending on the context of the inside information.

4.4.2 Further, employees shall not disclose such price sensitive information to any third party or encourage any other person to deal in price-affected securities

4.4.3 If in doubt, employees should follow the Code of Conduct Guide and refer to the relevant division to clarify the status of the information held by them.

4.4.4 Employees must ensure that all transactions in the Company shares comply with the procedures set out in the respective company's listing body and the law on insider trading as listed in the Guide.

4.5 NON-BUSINESS ACTIVITIES

4.5.1 Employees are not permitted to engage in personal activities including public service or political activities which conflict with the Company's business interest.

4.5.2 Employees shall require written permission to engage on their own time in such activities. The Code of Conduct Guide specifies the procedure to seek such permission.

4.5.3 Permission will not normally be granted unless all of the following criteria are met:

4.5.3.1 The engagement or activities must in no way conflict with the interests of Axiata and/or its subsidiaries and divide the employee's loyalty.

4.5.3.2 Some advantage to Axiata and/or its subsidiaries must arise as a result of the engagement or activities.

4.5.3.3 The time spent in the engagement or activities must not interfere with company duties.

4.6 PERSONAL FINANCIAL INTEREST AND BORROWINGS

- 4.6.1 Employees shall not have a financial interest in any organization that the Company conduct business with or compete with if that interest results in or appears to present a conflict of interest situation for the employees with the Company. Employees shall disclose such financial interest as indicated in the Code of Conduct Guide if it will cause or result in a conflict of interest situation.
- 4.6.2 Employees shall consider the following factors when assessing if an inappropriate interest exists:
 - 4.6.2.1 Whether the organization the employees invest in is competing with the Company.
 - 4.6.2.2 The size of employee's investment relative to their salary or household income, and if the investment is significant enough to motivate employees to take actions to protect or enhance their investment.
 - 4.6.2.3 The nature of employee's job in the Company would allow them to act in a manner that affects the value of their investment in other organization.
- 4.6.3 Employees are prohibited from borrowing from any organization that the Company conduct business with or compete with, unless the organization is a legal financial institution and the loans are granted at rates that are available to the general public. Additionally, employees are also prohibited from borrowing from representatives of any organization that the Company conduct business with compete with, regardless of the nature of business of the organization concerned.

4.7 POLITICAL AND CHARITABLE CONTRIBUTIONS

- 4.7.1 Employees shall not use the company's funds and resources to make contributions to any political campaign, political party, political candidate or any of employee's affiliated organizations unless otherwise authorised by the Company's board of directors.
- 4.7.2 Employees are entitled to make contributions to charitable organisations and provide non-commercial sponsorships, subject to the following conditions :
 - 4.7.2.1 The contributions and sponsorships are not made to secure any improper businesses or other advantages.
 - 4.7.2.2 The contributions and sponsorships do not give rise to any conflict of interest; and
 - 4.7.2.3 Steps have been taken to verify the recipient's reputation or status as a charitable organisation.

4.8 RELATIVE OF EMPLOYEES

- 4.8.1 Employees shall disclose to the Company if any relative (for this Code, "relative" comprises employee's spouse, parents, children, brothers, sisters and spouse of child, brother or sister) provides any form of goods or services direct or indirect to the Company, or is a competitor, vendor, business partner, contractor or consultant to the Company. Employees shall avoid or abstain from participating in or making decisions on any deal involving employee's relative.
- 4.8.2 If an employee's relative is a competitor or supplier of the Company or is employed by one, the employee is expected to exercise extra caution in their communication and conduct to ensure the security and confidentiality of information important to the Company and to avoid and/or create a conflict of interest situation.
- 4.8.3 Any exception to the above restrictions shall be approved and allowed on a case by case basis after considering the personnel involved as specified in the Code of Conduct Guide.

5. REPORTING, TRAINING AND EVALUATION

5.1 REPORTING VIOLATIONS AND SUSPECTED VIOLATIONS

- 5.1.1 All employees of Axiata Group and its subsidiaries are expected to abide by and be conversant with this Code. Adherence to the prescription of this Code shall be a condition of employment. The Group and its subsidiaries reserve the right to take disciplinary action against any employee found to be in breach of this Code.
- 5.1.2 The Code of Conduct Guide outlines the process for employees who require clarification on any aspects of the Code to avoid any misinterpretation or violation of the Code.
- 5.1.3 Employees who come across any unlawful or unethical situation, or any suspected violations of this Code shall raise their concerns following the guidance as set out in the Code of Conduct Guide and the Company's whistle-blowing policy.
- 5.1.4 All reports shall be discreetly, promptly and thoroughly investigated in accordance to applicable laws and regulations. In the event of severe compliance misconduct, disciplinary proceedings shall be taken by the Group or/and its Subsidiaries after due inquiry. Appropriate disciplinary actions shall be taken, including dismissal.
- 5.1.5 Reports shall be treated with the strictest confidence. Employees who report violations or suspected violations shall be protected from any threat. This assurance does not however extend to those who are found to have raised the matter under false or malicious intention.

5.2 TRAINING AND EVALUATION

- 5.2.1 All employees of the Group and its Subsidiaries shall be made aware of the Code of Conduct and its contents upon commencement of their employment and this shall form part of the Induction Programme.
- 5.2.2 The Group's Code of Conduct shall be made available on the intranet and be accessible to all employees. Employees will have access to the online Code of Conduct Guide which would include regular updates and refreshers to ensure the employees are familiar with the Code.
- 5.2.3 Employees shall have to participate in an annual online evaluation of the Code of Conduct awareness to assess the level of awareness of employees.

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DECLARATION BY EMPLOYEE

I, <<name>> (NRIC/Passport No.<<I.C/passport>>), hereby confirm that I have read and understood the Code of Conduct (“Code”) and agree to observe and adhere to the Code, as amended from time to time.

I shall conduct myself with complete professionalism, integrity and be true to the spirit of the Code in the daily execution of my duties and assignments and as an employee of Axiata Group Berhad.

I acknowledge that failure to abide by the Code will lead to the appropriate action being taken against me.

Name: <<name>>

Date :

Revision: Paragraph 1.2, 1.3, 2.3, 3.11, 5.1, 5.2. As baseline standards and guidelines grounded on UIEP values that are applicable to all employees across the Group.
Approved by Axiata Board at the Board of Directors’ Meeting [No. 7-15] held on 19 August 2015.