

SINGTEL GROUP ANTI-BRIBERY AND CORRUPTION POLICY

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1. Policy – Zero tolerance approach

- 1.1 Singtel adopts a zero tolerance approach to bribery and corruption of any form as set out in the Singtel Code of Conduct and reflected in this Anti-Bribery and Corruption Policy (“ABC Policy”). In this ABC Policy, Singtel refers to Singapore Telecommunications Limited and, where the context allows, each of its subsidiaries and references to Singtel policies include references to any equivalent policies adopted by overseas Singtel entities.
- 1.2 We do not offer or pay or accept any bribes for any purpose whether directly or through a third party. This applies to domestic and foreign governments, as well as to a private party (sometimes called commercial bribery).
- 1.3 We must at all times comply with the ABC Policy and all relevant anti-bribery and corruption laws including the Singapore Prevention of Corruption Act, the UK Bribery Act, the US Foreign Corrupt Practices Act, the Australian Criminal Code Act (and equivalent state legislation), and other similar anti- bribery laws where we do business.
- 1.4 This ABC Policy is to be read in conjunction with other related policies including the Singtel Code of Conduct, the Singtel Travel and Entertainment Policy (which sets limits on travel and entertainment expenditure) and the Singtel Supplier Code of Conduct which prohibits our suppliers and their supply chain from engaging in any form of bribery or corruption.

2. Bribery or corruption

- 2.1 A bribe or corrupt action includes the receiving, offering, promising, authorizing or providing “anything of value” (whether by doing something or not doing something) to any customer, business partner, vendor or other third party in order to secure, induce or keep an improper or unfair advantage.
- 2.2 “Anything of value” is not only cash, and includes (but not limited to) cash equivalents like gifts, services, employment offers, loans, travel and entertainment, charitable donations, sponsorships, business opportunities, favourable contracts, personal favours, or giving anything even if nominal in value.
- 2.3 There is a presumption of corrupt intent if anything of value is given to employees of, or persons dealing with the Singapore government, under Singapore laws.
- 2.4 Facilitation payments are also strictly prohibited. These are routine payments made in some countries to government officials to expedite or secure routine governmental action.

3. Compliance

- 3.1 All Singtel employees and boards of directors, and all third parties who represent us, or who are our suppliers, contractors or other business partners are required to comply with this ABC Policy, and not engage in any form of bribery or corruption.

3.2 You must as employees:

- a) Not give or offer to give or authorize to give anything of value that could be considered to be a bribe;
- b) Not request or accept or authorise the request or acceptance of, directly or indirectly, anything of value that could be considered to be a bribe;
- c) Know what this ABC Policy means and comply with it, always exercising good sense;
- d) Report as soon as possible any suspected breaches of this ABC Policy in accordance with the process set out in section 5.4 below.

3.3 You must as business leads or function heads ensure that:

- a) All employees in your sector, function or line of business are aware of the need to comply with this ABC Policy, and receive regular messages from the line management reminding them to comply;
- b) All employees in your sector, function or line of business complete any required ABC training within the timeframe as stipulated by Human Resources or internal policies or procedures;
- c) You report as soon as possible any suspected breaches of this ABC Policy in your sector, function or line of business in accordance with the process set out in section 5.4 below;
- d) All records are accurate, complete and accessible for review, including records relating to commissions, travel and entertainment. Please refer to Singtel Code of Conduct - Official Records that prohibits any practice that might conceal or facilitate bribery or any other corrupt action.

3.4 Specific guidance on common forms of bribery:

- **Gifts and hospitality, travel and entertainment:** It is the responsibility of the person extending or receiving such a gift, hospitality or travel and entertainment benefit to ensure that it is not a bribe and is in strict compliance with the Singtel Code of Conduct – Gifts and Hospitality and the relevant company policy on travel and entertainment.
- **Training, testing and seeding devices:** The acceptance of any devices (handsets, tablets, laptops or accessories) from vendors should be in strict compliance with the relevant company policy on training, testing and seeding devices.
- **Charitable contributions:** You must not use charitable contributions as a way of concealing a bribe.
- **Political contributions:** You must not use Singtel resources including funds or facilities to provide support for, or contribute to, any political organisation or candidate as Singtel is apolitical. Attendance of ticketed political fundraising events for corporations in Australia is prohibited, except where requested by VP, Regulatory & Public Affairs and approved by Optus CEO.
- **Sponsorships:** The provision of sponsorships should be in strict compliance with the relevant company guidelines.

4. Consequences of violation

- 4.1 A violation of this ABC Policy will lead to disciplinary action for the individuals involved up to and including dismissal, and reporting to the police or relevant regulatory agency. Additionally Singtel may also be exposed to criminal or civil claims and reputational harm arising from the violation.

5. Working with Third Parties & the Government

- 5.1 Our expectations on vendors and suppliers, contractors and other parties with whom Singtel does business are also set out in contractual documents and relevant codes, including the Supplier Code of Conduct.
- 5.2 We do not condone the action of, nor do we wish to be held liable for, any of our third parties who may have acted in a corrupt manner or in a manner inconsistent with this ABC Policy whilst acting for us, whether with or without our knowledge. Accordingly it is very important that the requisite and proper due diligence of all third parties representing us or providing services to us, is undertaken before we engage such third parties. These third parties should also undertake not to engage in any form of bribery or corruption.
- 5.3 A violation of this ABC Policy by any third party with which we contract or otherwise do business will lead to termination of any contractual arrangements.
- 5.4 If there are any concerns about the conduct of any person in their business dealings with Singtel which may be contrary to this ABC Policy, such concerns must be reported to a representative of Group Internal Audit, a senior leader in your area of the business (your Manager, or the next level Manager, or an HR representative) or to the relevant Whistleblower hotline in your country of operation.
- 5.5 Particular care must be taken when dealing with public officials, for example people who work for the government, or politicians and their staff. Such people can include employees or officers of a government body, as well as individuals who hold or perform the duties of an appointment, office or position of a government body. This includes employees or officers of government owned or controlled enterprises such as public institutions and state owned enterprises. Some other examples of public officials include planning officers or other employees of local planning authorities, council certifiers, council members, police officers, members of the judiciary and politicians at any level of government.

6. Monitor and Review

- 6.1 This ABC Policy will be regularly reviewed and updated as needed to ensure it continues to be adequate and effective.