



Singtel Group Code of Conduct

Introduction

The Singtel Group (“the Group”) has adopted a Code of Conduct (“the Code”) that applies to all employees. The Code sets out the principles to guide employees in carrying out their duties and responsibilities to the highest standards of personal and corporate integrity when dealing with Singtel, its competitors, customers, suppliers, other employees and the community.

The Code sets the minimum standard that the Group expects of all employees, regardless of the jurisdiction or legal entity through which the Group operates. Where appropriate, the Code can be supplemented by additional specific requirements related to a country, entity or business unit.

It is the responsibility of every employee to comply with the spirit and principles of the Code, as amended from time to time.

Compliance with the Law

In addition to the Code, Singtel expects employees to comply with all laws, regulations, codes of practice, and legal, regulatory and licensing requirements applicable to the different jurisdictions where it operates.

Employees should not engage in any activity that adversely affects the Group’s interests or reputation, including but not limited to, engaging in any act whether in the workplace or otherwise that, in the sole discretion of the Group, involves violent behaviour, moral wrongdoings, or which constitutes a criminal act under all applicable laws, regulations and legal requirements, regardless of whether the employee is criminally charged or convicted.

Workplace Health and Safety

The Singtel Group is committed to provide a healthy and safe work environment for employees, customers, business partners and visitors. Every employee has a personal responsibility to support this commitment.

Employees are obliged to carry out their work in a safe manner, without causing harm to themselves or others, and to report any potentially unsafe or unhealthy situations immediately.

They must observe and follow all safety and environmental regulations laid down in the operation instructions, including putting on the necessary safety equipment, and conduct specific risk assessment prior to carrying out any works including team building activities, where applicable.

All employees must observe the rules of office security.

Company Property and Assets

Employees are responsible for company property entrusted to them. This property includes, but is not limited to physical property (such as phones, company vehicles or computers), records (such as data on customers and company records), and intangible property (such as computer software and computer records). It is important that, whichever category the property falls into, employees must treat Singtel's property as they would their own and must not damage it, deface it or remove it for personal use, unless authorised to do so.

Company vehicles are strictly to be used for work purposes only. Employees must not, without authorization, drive company vehicles for personal use.

Similarly, they are responsible for the proper expenditure of the company's funds including expenses. While spending or committing company funds, employees must be sure that the transaction is proper and documented, and that the company receives appropriate value in return.

Computers

Employees must use office computers, or terminals, only in the way in which they have been instructed. They should protect their own password and not use anyone else's ID or password to access records.

Unless authorised, employees must not alter records or software instructions. They must always ensure that any software they use has been obtained from authorised suppliers and should only install software if they are permitted to do so.

Just as they must not misuse company property, they must not dispose of any company property in an unauthorised manner, such as by selling, loaning or giving it away without proper permission.

Use of IT Systems

Employees must act responsibly when updating their personal data or uploading any information (statements, documents, videos, photos, etc.) in any IT systems provided by the Group. They must not knowingly update false information nor upload any materials that are defamatory, offensive, obscene, inappropriate or that violate or infringe any laws, copyright, trademark or any other intellectual property, personal or proprietary rights of any person, including any obligation of confidence.

Work Performance

The Group is committed to providing quality and efficient service to all customers, and every employee has an important role to play.

Employees are required to perform tasks assigned in a responsible and reliable manner and to manage time at work efficiently, without wasting company time and resources by taking part in unauthorised activities including, but not limited, to trading, gambling or political activities on the premises. They must act sensibly and conduct themselves whether at work or outside of work in a manner that upholds the integrity, reputation and values of Singtel.

Dealings with other Employees

The Group is committed to provide employees with a work environment which is conducive, safe and free from discrimination and harassment. Employees should treat their colleagues and other persons with respect and consideration at all times.

Workplace harassment can occur when one party demonstrates behaviour that causes or is likely to cause harassment, alarm or distress to another party. Examples of behaviour that may be considered harassment include but are not limited to threatening, abusive, or insulting language, comments or other non-verbal gestures, discrimination, physical violence, cyber-bullying, sexual harassment and stalking. Workplace harassment can also take place through different modes of communications, such as by email, text messaging or social media.

The Group will not tolerate any acts of discrimination or harassment and will investigate all complaints and incidents in a fair and timely manner.

The Group prohibits any form of retaliation or intimidation against any person for making good faith reports concerning allegations of discrimination, harassment, violation of the Code of Conduct, or any other allegations of improper behavior. Any employee, who is found guilty of such acts shall be subject to disciplinary action, which may include termination/dismissal from service.

While on duty, employees must not conduct themselves in such a manner that will interfere with or prevent other employees from carrying out their duties properly.

Customers and Business Partners

Honesty in all dealings with the government, businesses and other organisations is essential. Making of payments or payments in kind such as gifts or favours to influence individuals to award business opportunities to the Group or to make a business decision in the Group's favour is prohibited.

Employees must always seek any third party's confidential information through the proper authorities. If given such confidential information, employees must ensure that they are entitled to have it, and obey the rules of having such information, if any.

They must always maintain good relationships with customers which is vital to the success of the business. Customers must feel that they are getting the highest standard of service from a company which listens to them and is responsive to their needs.

All contracts with customers and business partners must be fairly arrived at, with no hidden deals or unspoken agreements, and fully documented in writing. Information about customers and business partners must remain confidential and should only be imparted with full authority to do so.

We all have a responsibility to promote and protect the Singtel brand. Employees who are engaged in any form of marketing activities either directly or via Agents, on behalf of the Singtel Group, are expected to comply with the Singtel Marketing Code of Conduct. The code embodies the basic guidelines and rules upon which all marketing activities are to be conducted, which includes fundamental principles of fairness, honesty and integrity.

Alcohol & Drugs

Drugs and/or alcohol can impair an individual's capacity to perform his/her job safely, efficiently and with respect for colleagues and customers. The use of such substances may result in injury or a threat to the well-being of an individual, colleagues, customers or members of the public.

An employee must attend work in a fit state and is not to be under the influence of alcohol or drugs during working hours.

Involvement with the manufacture, possession, use, distribution, sale, purchase, or transfer of illegal drugs is strictly prohibited.

Official Records

Information is a valuable asset of the Group and its integrity depends on the honesty, completeness and accuracy of its records. This means that anyone preparing the company's records and reports must be diligent in assuring the accuracy and completeness of all data, records, reports and expenditure connected with the company.

Employees must keep copies of company records such as installation data, customer records and test data at a safe location. For financial record keeping purposes, employees must not engage in any practice or procedure which might conceal, facilitate or constitute bribery, kickbacks, improper gratuities or other illegal or improper payments or receipts, or which might appear as such.

Proprietary Information & Intellectual Property

Many employees have access to information, which includes the trade secrets, know-how used by the Group to distinguish its businesses and services from those of competitors, as well as sensitive private business information of a commercial, technical or financial nature such as prospects, agreements with customers, business partners, competitors, account plans, business proposals, negotiations and contracts.

It is important that all company proprietary information is kept confidential. Employees have a duty to safeguard company information, bearing in mind ethical, legal ramifications and government regulations. Information of commercial value or of a sensitive nature must be tightly controlled. For example, when releasing information to a third party for a bid proposal, a Non-Disclosure Agreement should be signed by the third parties, and information released is on a need-to-know basis.

Any trademark, copyrights, patents, designs, registered designs, proprietary information and all other intellectual property rights developed and commissioned by the company belong to the Group. Employees are reminded not to infringe any third parties' rights including, but not limited to, any third party intellectual property rights, copyrights, patents and trademarks.

The Group will hold exclusive property of any invention, discovery, design or improvements made. This could also include inventions employees may create which relate to the company's business, regardless of whether the invention or designs are patentable or are capable of being registered or copyrighted.

Employees must report these inventions to the company and shall, at the company's request and expense, disclose information relating to the invention and do what is

required to obtain patents or industrial rights relating to the invention. The patents will be in the name of the company or its nominee and the employee will not be entitled to any payment for the invention. The company's ownership of any intellectual property created by employees while with the company continues after they have left service.

When employees leave the company for any reason, including retirement, they must return all the company's property, including all documents and records in their possession, and they must not disclose or misuse company confidential information. Employees are also responsible for protecting information provided in confidence by any third party, such as a customer, supplier or a partner, after they leave the company.

Obligation to main confidentiality of Confidential and Proprietary Information

During their employment with the Group, employees may receive and/or have access to secret, confidential or proprietary information relating to Singtel and/or any company in the Singtel Group (including but not limited to joint venture companies held by Singtel and/or its subsidiaries) or any other company or entity (i) in which any of the Singtel Group of companies may have an interest (equity or otherwise) or (ii) to whom any of the Singtel Group of companies owe an obligation (whether pursuant to a contract or otherwise). Such secret, confidential or proprietary information may, without limitation, be verbal, written, electronic or in the form of image data, photographs or software. Employees are required not to disclose or divulge or cause to be disclosed or divulged such information without the prior written approval of or clearance from the company. This condition shall continue to apply even after they are no longer employed by the Group.

Conflict of Interest

A 'conflict of interest' arises when employees have a competing professional or personal interest that would either make it difficult to fulfil their duties properly, or would create an appearance of impropriety that could undermine customer or public confidence.

Employees must do nothing that conflicts with the interests of the Group, or anything that could be construed as being in conflict, for example, participating in the evaluation/approval of award to a vendor in which an employee has a vested interest (either personally, or through close relatives). Employees should declare/disqualify themselves from handling transactions which put them, whether perceived or real, in a position of conflict.

Employees must avoid all situations which could result in conflicts of interest. They should comply with reporting and disclosure requirements of potential or actual conflicts of interest, and disclose any matters which could reasonably be expected to interfere with their professional duties.

Business Dealings

Employees should not engage in any outside business dealings that involve or could appear to involve, a conflict between their personal interests and the interests of the Group (i.e. conflict of interests).

Employees must not have any direct or indirect financial or business interest in or dealings with competitors, suppliers, customers or anyone else with whom they are engaged in a business relationship on behalf of the Group, which might or might appear to, create a conflict of interest, or impair the judgments they make on behalf of the Group.

They should also not engage in any personal business dealings which detract from or conflict with their employment in Singtel.

Employees must avoid situations where their loyalties may be divided between the Group's interest and those of a customer, supplier or competitor.

Employees must not take advantage of any opportunity for personal gain that rightfully belongs to Singtel. They should avoid putting themselves in any situation which might, or might appear to put them at a personal advantage, and they must report any potentially compromising situation to their supervisors promptly.

Employment Outside Singtel Group

Employees should not engage in any outside employment or hold any position without the prior written consent of their VP or higher authority, as appropriate unless such employment has been arranged or is undertaken in connection with the performance of their responsibilities and duties as part of the Singtel Group.

All outside appointments and activities (including business activities), directorships and employment must be declared and approved in advance.

If employees are considering accepting an external appointment, they must consider if accepting this position may give rise to the possibility of conflict. If they have been given permission to take on such employment or to have other business relationships, they must ensure that these activities do not negatively affect their ability to fully and effectively perform their role for Singtel or Singtel's reputation and/or its services to customers or Singtel's current or future business plans.

Insider Trading

Employees must not use "inside" information - information which has not been made available to the public and which may materially affect a corporation's stock price - as the basis for purchasing, or selling, shares in the company, or any other company with which they have dealings. Such information may include unannounced earnings, dividends or potential acquisitions. Employees must not engage in, or procure another person to engage in, any share transactions with respect to the shares of the corporation, whether it is for themselves, anyone else or for the Group, when in possession of inside information.

Gifts and Hospitality

Generally, the acceptance of gifts or hospitality events/invitations from customers, existing and/or potential, business partners, suppliers, contractors, competitors or members of the public is prohibited as it may create a situation of conflict or potential conflict of interest.

Where circumstances make it impossible, difficult or impractical to reject the gifts or hospitality events/invitations, employees should immediately declare such gifts or hospitality events/invitations to their supervisors and HR. This applies to all except perishables and those of a token value. When in doubt whether the gift or hospitality event/invitation can be accepted, the employee should declare.

As business lunches/dinners are an accepted mode of hospitality, these need not be declared but care must be exercised while accepting such meals. These should be infrequent and non-lavish. The sole purpose must be for enhancement of a business relationship and not for reciprocity.

It is the Group's policy not to accept hospitality events or invitations which involve air travel and/or accommodation. The employee may accept the invitation only if the cost of the air travel and/or accommodation (including related expenses) is fully borne by the employee's unit and with prior approval by the line VP/MD. The VP/MD granting approval must ensure that the employee's acceptance does not create any conflict of interest or potential conflict of interest in Singtel's existing or future business dealings with the inviting party or bring disrepute in any form or manner to the Singtel Group.

Gifts extended to External Parties/Customers

Due consideration should be given to gifts or benefits extended to external parties in public or private sector. It is the responsibility of the person extending such a gift to ensure that it is deemed reasonable and consistent with the purpose and hence not misconstrued as a bribe or in contravention with any existing Corrupt Practices Act, or other prevalent legislation, in any country where we conduct our business including Singapore.

Data Protection

All employees who have access to and/or collect, use disclose or process personal data of external parties or other employees, are responsible for complying with the Singtel Group Personal Data Protection Policy—General and where relevant, the Singtel Group Personal Data Protection—Guidelines for People Managers, and to adhere to all internal procedures and processes developed to ensure that Singtel and/or any company in the Singtel Group are compliant with the requirements of personal data protection laws. Employees understand, agree and consent to collection, use and disclosure of their personal data as described in the Personal Data Consent Policy for Staff. An employee's personal data protection obligations may overlap with obligations relating to secret, confidential or proprietary information relating to Singtel and/or any company in the Singtel Group, and both these categories of obligations shall apply at all times.

Dealing with the Media

All media requests for information and interviews should be referred to Corporate Communications Division (in Singapore) or Corporate Affairs Department (in Australia). No comments regarding Singtel Group, its business, products, services, strategy or practices should be made without prior approval from Management. Where employees do participate in blogs or any other online space, even personal sites maintained outside of work hours, they should take care to ensure that they do not act in conflict with the best interests of the Group

Fraud

Singtel Group is committed to high standards of probity and accountability in its affairs. It recognises the importance of protecting its operations, employees and assets against fraud risks and unethical practices, and therefore adopts a "zero tolerance" approach to fraud, corruption and any other form of criminal conduct.

Where an employee has concerns or receives information about any fraud, corruption or other form of criminal conduct in connection with the affairs of a Singtel Group company, it is the employee's responsibility to report those concerns or information via the channels listed in the Singtel Group Whistleblower Policy.

Penalties

Failure to comply with the Code is viewed as a serious matter that can lead to disciplinary action, up to and including termination of employment or dismissal, as well as criminal penalties. Such disciplinary action may also be taken against supervisors who condone, permit or have knowledge of improper conduct.