

**SINGTEL GROUP
ANTI-BRIBERY AND
CORRUPTION POLICY**

AUGUST 2017

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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”).
- 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 other similar anti-bribery laws where we do business.
- 1.4 The 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” 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 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 government, under Singapore laws.
- 2.4 Facilitation payments are 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 employees and board of directors of Singtel, 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. Singtel refers to Singapore Telecommunications Limited and its subsidiaries.

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 Policy means and comply with it
- d) Report as soon as possible any suspected breaches of this ABC Policy to the Singtel Whistleblower hotline, without risk of reprisal.

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 the 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
- c) Any non-compliance to the ABC policy in your sector, function or line of business is referred to the Singtel Whistleblower hotline
- 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 Singtel Travel and Entertainment policy.
- **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.

4. Consequences of violation

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 the Singtel Group may also be exposed to criminal or civil claims and reputational harm arising from the violation.

5. Working with Third Parties

We do not condone the action of, nor do we wish to be held liable for, any of our third parties who may have made any bribes 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, are undertaken before we engage such third parties. These third parties should also undertake not to engage in any form of bribery or corruption.

6. Monitor and Review

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