

Singtel Group Anti-Bribery and Corruption (ABC) Policy

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Singtel Group CEO Message

Operating with Integrity, Upholding our Commitment

The Singtel Group has zero tolerance for any form of bribery and corruption. We are committed to upholding the highest standards of business conduct, guided by our COMMIT values. One of these core values is to operate with integrity, which means not only complying with laws and regulations, but also conducting business with honesty, transparency and fairness.

Our Group Anti-Bribery and Corruption Policy sets out clear expectations and responsibilities for our employees, business partners and anyone acting on behalf of Singtel across our organisation and in all countries where we operate.

Our reputation and long-term success are built on the trust of our customers, partners and stakeholders, and we have a shared responsibility to do business honestly and ethically to retain that trust.



Yuen Kuan Moon

Group Chief Executive Officer

1 Our Commitment

1.1 Our Core Value

Singtel Group¹ is committed to complying with all laws and regulations, including anti-bribery and corruption laws, in the countries where we operate.

One of our core values, Operate with Integrity, means doing what's right and not what's easy. It serves as a foundation to how we act and make decisions – and we expect the same of the counterparties that we work with.

Our Group Anti-Bribery and Corruption (ABC) Policy builds on this by providing greater guidance on expected behaviours and driving an ethical culture.

Core Principles:

- We do not offer or accept excessive or inappropriate gifts or hospitality.
- We do not make inappropriate charitable contributions.
- We do not offer or accept inappropriate sponsorships.
- We do not make political contributions.
- We do not offer or accept facilitation payments.
- We do not offer or accept improper inducements to or from public officials.
- We work with responsible business partners and do not use third parties to bribe on the Group's behalf.

1.2 Overview

Bribes are “anything of value” intended to secure an improper advantage or otherwise inappropriately influence the recipient. Regardless of whether the bribe is funded by the Group, counterparties or employee's personal resources, offering a bribe can violate the law even if it is not accepted or does not result in any tangible benefit.

Corruption refers to the act of offering, promising, giving, demanding, or accepting any personal, financial or other benefit, whether directly or indirectly, to obtain or retain business or other improper benefit from a third party, whether public or private.

Anti-bribery and corruption laws include all applicable country, federal, state, and local laws, ordinances, codes, regulations, rules, policies, and procedures, including but not limited to anti-bribery and anti-corruption laws such as the U.S. Foreign Corrupt Practices Act, U.K. Bribery Act, Singapore's Prevention of Corruption Act (Cap. 241), Australia's Criminal Code Act 1995 as well as any other similar anti-bribery and corruption laws.

¹ Covers wholly and majority owned subsidiaries

1.3 Applicability and Scope

This Policy is applicable to the Group and its subsidiaries over which it exercises control. It does not apply to associate companies or joint ventures where the Group does not have a controlling interest.

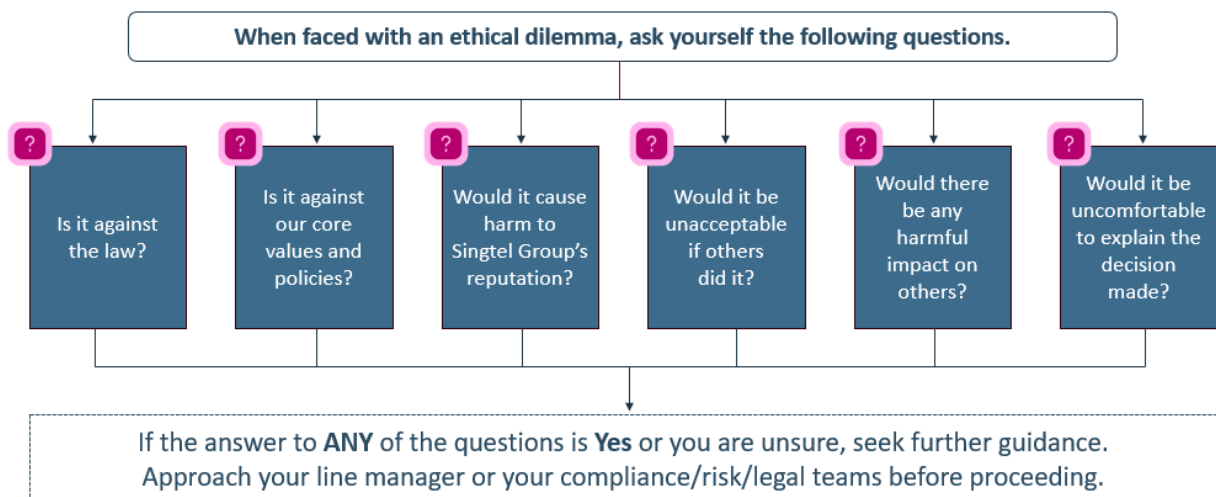
All directors, officers, and employees of entities in the Group are required to comply with this Group ABC Policy. Further, all entities in the Group shall use reasonable efforts to procure and/or ensure that their respective representatives, agents, contractors and/or any other third party(ies) acting for or on their behalf, agree to comply with the Group ABC Policy.

Our Roles & Responsibilities

As individuals, we have a responsibility to act ethically and in compliance with the law. This means you must:

- Read, understand and uphold the Group ABC Policy.
- Act in accordance with the principles in the Group ABC Policy and adhere to the accompanying procedures.
- Complete required compliance training relating to the Group ABC Policy.
- Speak up when we have any concerns or become aware of possible breaches of the Group ABC Policy.

Policy and procedures might not always provide clear answers to every situation you face. When you are unsure how to respond to a situation, you should always consider and be aware of potential impact due to choices made, as well as use sound judgement in making decisions.



The Group takes a strong stance against unethical conduct and will only work with parties who have ethical practices. Employees who fail to comply with this policy, including leaders who ignore potential misconduct, may face disciplinary measures, up to and including termination of employment or engagement. Counterparties who violate the terms of this policy or fail to report potential violations may face contract termination.

1.4 Our Resources

Our Group ABC Policy is aligned with our Group Code of Conduct and covers the following topics:

- a) Gifts and Hospitality
- b) Conflict of Interests
- c) Charitable Contributions and Sponsorships
- d) Political Contributions
- e) Facilitation Payments
- f) Third Party Due Diligence
- g) Risk Management
- h) Whistleblowing
- i) Investigations
- j) Records Retention

These resources are all available and can be easily accessed from our Group [Espresso page](#) or [Central Policy Library](#).

1.5 Deviations and Exceptions

The Group recognizes the diverse operational environments within the Group and across its various subsidiaries ("OpCos"). This policy, set at the Group level, serve as an overarching framework that ensures consistency and coherence throughout the Group. It is equally important for each OpCo to comply with local laws and regulations where is operates. Entities in the Group may adapt or supplement additional guidelines or procedures in relation to the Group ABC Policy, to manage specific risks arising from their respective business activities and ensure compliance with applicable laws and regulations. In cases where local laws and regulations are more stringent than our Group policy, those higher standards must be adopted and followed.

Any deviations from the Group ABC Policy must be justified, documented, and reviewed by VP, Group Risk and Compliance as well as Group General Counsel. Material deviations must also be endorsed by either the Group Chief Corporate Officer and/or approved by the relevant Group company's Executive Committees (where applicable).

Examples of material deviations include:

- Changes that affect the key principles or objectives of the Group ABC Policy
- Changes that introduce new requirements or significantly modify existing ones
- Changes that may have legal or regulatory implications

2 Our Business Practices

2.1 Gifts and Hospitality

We understand that business relationships are often built through social settings and activities such as meals, events, or gifting. However, you must ensure that these are in line with the principles of reasonableness, appropriateness, and proportionality.

Gifts and hospitality should **never be made with an intent to receive unfair preferential treatment in return, or where this could reasonably be perceived to be the intention**. They should be transparent and recorded accurately with relevant documentation. They should also be appropriate in terms of type, value, and frequency to the occasion and position of the recipient.

Gifts and hospitality could become inappropriate when:

- Provided frequently
- Provided at a sensitive time (e.g., upcoming business decision or engagement to be made)
- Lavish in nature
- Solicited directly or indirectly
- Not in line with normal business practices or cultural norms
- Recipient could be placed in an awkward position due to their own organisational policies
- Creates an actual, potential, or perceived conflict of interest situation
- Violate laws and regulations

If the gift or hospitality involves any of the above situations, it should not be accepted or extended.

Do note that gifting of cash or cash equivalents (e.g., cheques, gift cards or cash vouchers) are strictly prohibited.

2.2 Conflict of Interests

As set out in our Group Code of Conduct, we ensure that our personal interests and relationships do not create conflict of interests during our work. This refers to situations where your personal interests (or those of a family member or close contact) may affect your ability to act in the Group's best interests, impacting your work objectivity and obligations. Conflict of interests can be actual, perceived or potential in nature.

New employees are required to complete a conflict of interest declaration as part of their onboarding process. Thereafter, employees will be required to submit a mandatory conflict of interest declaration at least once every year.

Always declare any conflict of interests, obtain the required approvals and execute any remediations where needed. Personal conflict of interests would often be easier to resolve when disclosure has been made early enough so that the needed approvals or remediations can be implemented in time.

Examples of situations that may give rise to a conflict of interest and require disclosures to be made:



- Personal relationships with parties who work for or work with any Group company, as well as competitor firms
- Direct or indirect financial investments
- Outside employment or business
- External directorship

2.3 Charitable Contributions and Sponsorships

Charitable Contributions

Aligned with our purpose, Empower Every Generation, the Group seeks to create positive change by making charitable contributions to support causes in the communities in which we operate around the world.

Contributions can take various forms, including but not limited to:

- Monetary contributions
- Contribution of goods, services, and time
- Contribution of assets, such as inventory
- Usage of company property, equipment, technology, or space

Charitable contributions should **never be used as a way of concealing a bribe or where it could reasonably be seen as an attempt to gain improper influence or benefit**. They must be transparent and in accordance with applicable laws.

Singtel Touching Lives Fund (STLF) is the Group's flagship corporate philanthropy program, and our contribution efforts are primarily concentrated on this. For all other types of charitable contribution, please seek the approval of the CEO of your business. If you have any doubts, please reach out to your respective Risk and Compliance teams.

Sponsorships

Sponsorships differ from charitable contributions as there is a business purpose to promote the Group's brand. This can come in different modes such as the following:

| Categories | Examples |
|-------------------------|------------------------------|
| Industry Related | Trade shows |
| Sporting | Racing, Olympic communities |
| Culture | Exhibitions, music festivals |
| Education | College fairs |
| Strategic Partnerships | Building projects |
| National Events | National day |
| Bilateral Relationships | Embassy events |

Sponsorships should **never be provided with the expectation of gaining favourable treatment or influence in return**. All sponsorship activities made must be aligned with business strategic objectives, be transparent and conducted in accordance with applicable laws.

Before making any sponsorships, please seek the necessary approvals. The Group does not allow any sponsorships of individuals. If you have any doubts on the appropriateness of a sponsorship, please reach out to your respective Risk and Compliance teams.

Before proceeding with a charitable contribution or sponsorship, check that:



- They are made for supported causes or programmes.
- Recipients are legitimate organisations. In the case of charitable contributions, recipients should also be formally registered charity organisations.

Charitable contributions and sponsorships could become an issue when:

- Given to individuals or for individual pursuits
- Given to political or religious associations (for direct benefit of their members)
- Given to causes/programmes that could potentially create reputational risks
- Made through other parties on behalf of the Group

As a general guideline, we should only contribute to programmes that are related to our industries and/or geographical locations we have operations in.

2.4 Political Contributions

Political contributions are monetary or non-monetary support for political candidates, parties, committees, or advocacy groups involved in political activities.

Non-monetary support includes usage of any company property, equipment, technology, or office space as well as resources to engage in political activities.

Political contributions carry legal risks as the laws of many countries set strict limits on, and in some cases, even prohibit corporate political contributions. Additionally, there may also be reputational risk of being associated with certain political figures or parties.

The Group has adopted a policy of political neutrality and to refrain from situations like impropriety or conflict of interests, we generally **do not allow any political contributions** to be made. Any exceptions to this will need to be in compliance with applicable laws and must have received the approval of the CEO of your business. However, we respect the decision of employees on their individual political affiliations conducted using their own funds, time and space.

2.5 Facilitation Payments

Facilitation payment, often known as 'grease payment' or 'expediting payment', refers to a small payment made to government officials or other individuals in authority to expedite routine governmental duties or processes that are typically within their official duties. Some examples are payments made to secure or expedite obtainment of permits, licenses, visa issuances or customs clearance.

The Group **strictly prohibits** its employees, representatives, and agents from offering, giving, soliciting, or accepting facilitation payments. Employees who become aware of any requests or instances of facilitation payments must report such incidents immediately to Risk, Compliance and Legal. Prompt reporting allows us to take appropriate actions to address the situation and mitigate any associated risks.

In exceptional situations where demands for such payments are accompanied by a form of extortion or threat, employee safety is our utmost priority. Where such circumstances occur, as soon as employees reach a place of safety, they must immediately make the necessary reports and declarations to Group Risk and Compliance as well as Group Legal where such payments have been made.

3 Our Business Partners

3.1 Dealing with Public Officials

Interactions with public officials carry inherent risks due to the nature of their roles and require heightened scrutiny to ensure compliance with anti-bribery laws and regulations.

Public officials can include, regardless of rank or position, any officer or employee of a government department, agency, political party or public international organisation, as well as intermediaries acting on their behalf. Examples of public officials include elected or appointed government officials, government ministers, civil servants, public sector executives or regulatory authorities. If you are unsure on whether the counterparty you are dealing with is considered a public official, treat them as if they are and follow the necessary reviews and approvals.

We are committed to conducting all dealings with public officials with the highest standards of integrity and transparency. The Group **strictly prohibits** offering, giving, soliciting, accepting bribes or other improper inducements to or from public officials. This includes any form of payment, gift, favour, or benefit intended to influence the official actions or decisions of public officials.

Gifting to public officials is generally discouraged. However, it may be permissible if it complies with established guidelines and is conducted in a transparent and appropriate manner as follows:



- Before any gifting to public officials, consider the above business practices ([section 2](#)), seek approval from your manager and ensure that the request has been reviewed by your compliance or risk teams.
- Ensure that the giving of gifts and hospitality is not frequent and adheres to applicable laws and our policies.
- Maintain complete and accurate records of interactions with public officials.
- Declare any actual, perceived or potential conflict of interest as early as possible.

3.2 Dealing with Counterparties

Counterparty refers to any customer, supplier, vendor, reseller, service provider, partner, or any other third parties that the Group intends to establish or maintain a contractual or business relationship with.

We only deal with responsible counterparties who uphold ethical standards that align with our Group ABC Policy and Code of Conduct. We expect all counterparties to adhere strictly to applicable laws – including understanding and complying with the relevant regulations in the jurisdictions where they operate. These counterparties should also not engage in any form of bribery or corruption. Remember, their reputation and behaviour can directly affect us. As such, we need to act with due care when evaluating prospective counterparties to work with.

Examples of key considerations could include whether the counterparty:

- Has any known history of unethical conduct
- Is subject to any investigations or allegations
- Has sound financial standing
- Possesses relevant expertise

Due diligence serves as a critical component of our efforts to ensure that we can identify and take action to address red flags early **prior** to engagement, as well as have proper monitoring over the course of higher risk engagements. If there are any red flags noted about the counterparty or if you have any doubts, please reach out to your respective Risk, Compliance and/or Legal teams.

3.3 Business Intermediaries

Business intermediaries refer to an individual or company authorised to represent or act on the Group's behalf in providing services or engaging in business activities with other parties.

Examples of such activities could include dealings with business development agents, certain consultants and sub-contractors, joint venture partners, or agents representing the Group in dealings with government bodies to secure licenses, permits or intervene in a regulatory matter.

The Group **can be held liable under anti-bribery and corruption laws for the actions of third parties representing us** – even if we did not approve or were not aware of the inappropriate actions undertaken by them.

As such, the Group will only engage business intermediaries who demonstrate a bona fide commercial purpose, supported by clear contractual deliverables and relevant local experience. Due diligence **must** be conducted on all potential intermediaries **prior** to engagement, and with the necessary approvals sought. Engagement of such representatives should be done with clear and comprehensive contracts setting out in detail the scope of work, deliverables, payment terms, obligation to comply with all laws including anti-bribery and corruption laws and termination rights.

4 Risk Assessment and Controls

The Group's Anti-Bribery & Corruption (ABC) Compliance Program is designed to enable the organisation to better Prevent, Detect and Respond to ABC risks and incidents, with the fundamental aim to build an ABC risk-aware environment.

A comprehensive assessment of ABC exposure and risks will be conducted as part of regular risk review. Based on the findings, there will be periodic testing of internal controls to ensure that they are functioning effectively and can mitigate the identified ABC risks.

5 Training and Communication

All new employees are required to complete training on the ABC policy as part of their onboarding process. Mandatory annual refresher training will be provided thereafter for all employees to keep updated on ABC requirements and responsibilities. Targeted training sessions will also be conducted on an as-needed basis for teams that have higher exposure to ABC risk.

The Group ABC Policy is available on the company's corporate website and internal intranet. Communications will also be disseminated periodically to employees to serve as regular reminders.

6 Speaking Up

If you have concerns of violations or potential violations to this Policy, **you have a responsibility to report the matter**. You can report the matter to your direct or next level Manager, a People & Culture representative, directly to Internal Audit, or anonymously through our whistleblower channel (independently managed by Deloitte).

| Channel Type | Details |
|--------------|---|
| Call | +8000 9447853 / +65 68003003 |
| Online | https://tipoffs.asia/deloittewhistleblowerhotline |

All matters reported will be investigated and handled in confidence. For more details, you can refer to our Singtel Group Whistleblower Policy.

You can always **report your concern without fear of retaliation**. The Group is committed to protecting anyone who, in good faith, reports concerns and refuses to engage in bribery or corruption, even if it means losing business opportunities. We would also not tolerate any action by any person within the Group attempting to threaten, harass or dissuade an individual who is intent on complying with our core values and this policy.

Your responsibilities:



Our most effective touchpoint for detection and reporting of possible conduct in breach of this Policy is **you**. If you have any concerns or know of any red flag, do the following:

- Escalate these to the relevant personnel or through our whistleblower hotlines.
- If the matter is part of a transaction or approval process you perform, place them on temporary hold.
- Avoid notifying or "tipping off" any other party that you are aware of potentially illegal or improper activity.

7 Record Keeping

It is essential for us to maintain accurate, complete and transparent documentation records. This applies not only to financial transactions, but also to business records which can include gifts and hospitality declarations, due diligence activities, correspondence on negotiations as well as any other interactions that may be subject to scrutiny. Proper record keeping supports our commitment to prevent bribery and corruption, helps demonstrate compliance with anti-bribery regulations and provides evidence in the event of audits, investigations or reviews.

8 Review

The Group ABC Policy will be reviewed on an annual basis or earlier as required. If you have any questions regarding this policy, please consult with Group Risk and Compliance.

Version Control History

| Version No. | Date | Description | Revised By |
|-------------|-----------------|-------------|-------------------------------|
| 1.0 | 14 January 2026 | First issue | Group Risk & Compliance (GRC) |