



ANTI-BRIBERY AND ANTI-CORRUPTION (ABAC) POLICY STATEMENT

Smart Axiata Co., Ltd. (hereinafter referred to as “Smart Axiata”) takes pride in being one of the leading telecommunications and tech companies in Cambodia. In line with our mission of “We connect. We make lives better.”, Smart Axiata aims “To be the #1 & most loved communication tech brand in Cambodia by 2022.”

“We are open and honest.” is one of the core values Smart Axiata strongly upholds, very much in line with Axiata Group’s belief in “Uncompromising Integrity.” We are committed to a zero-tolerance approach to any form of bribery or corruption in the course of our business. Our belief is that no business opportunity or relationship is more valuable than the brand and reputation of Smart Axiata.

Smart Axiata strictly prohibits the giving and receiving of bribes or the participation in any acts or situations that may lead to or be perceived as bribery. Our stakeholders are also required to adhere to Smart Axiata’s ABAC governance instruments (Framework, Policies and Procedures, and Code of Conduct).

All stakeholders, including Smart Axiata’s directors, employees and business associates that Smart Axiata has business relationships or obligations with, play an important role in Smart Axiata’s commitment to conduct our business fairly, impartially and in full compliance with all applicable laws and regulations in Cambodia.

To keep apace with developments, Smart Axiata reserves the right to update its policies and any other governance instruments when deemed necessary. We will take necessary actions, consistent with Smart Axiata’s governance instruments, against persons who do not comply, including, but not limited to, terminating all work and/or business relationships.

Smart Axiata communicates in an open, transparent and honest manner without fear of repercussion or retaliation. Retaliation and discrimination against anyone who reports, in good faith, incidents of non-compliance or violation(s) of Smart Axiata’s policies will not be tolerated. Please refer to the Whistleblowing/Speak Up policy and procedures and Speak Up channel to report any concerns about any non-compliance or unethical practices.