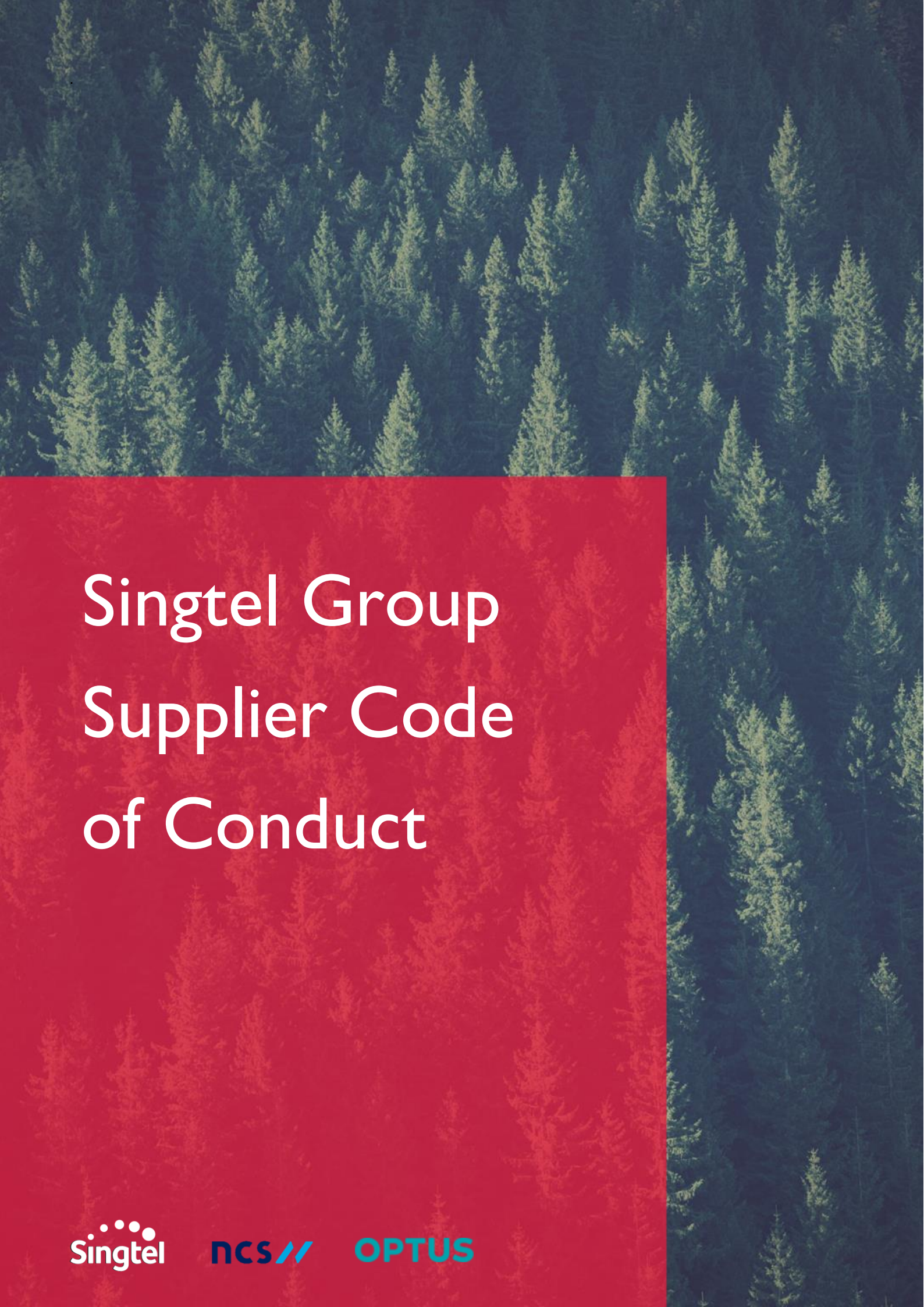




Singtel Group Supplier Code of Conduct



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1. Introduction

Our purpose at Singtel Group is to harness technology to empower people and businesses to create a more sustainable future. We recognise that the social and environmental performance of our business and our business partners, including suppliers, play a significant role in our long-term success.

The Singtel Group is committed to understanding and minimising the social and environmental consequences of our business operations. This commitment extends to the procurement of products and services. We endeavour to collaborate with transparent, ethical as well as environmentally and socially responsible suppliers who must meet or exceed the requirements and expectations set out in this Singtel Supplier Code of Conduct (SCC).

Singtel expects these principles to apply to our licensees, retailers and suppliers including parent entities and subsidiary or affiliate entities, as well as all others with whom they do business including employees, subcontractors and other third parties. The Singtel Group requires all suppliers to communicate this SCC to their employees, subcontractors and other relevant third parties, in the local language, and in a manner that is understood by all.

The Singtel Group requires suppliers to establish and maintain appropriate management systems, the scope of which are related to the content of this SCC. The Singtel Group also expects suppliers to be proactive, as they review, monitor and modify their management processes and business operations, to ensure alignment with the principles set forth in this SCC.

The Singtel Group will work with suppliers to ensure we achieve an improved performance in each of the areas outlined in this document. All procurement decision making will favourably consider suppliers that have adopted these areas, or can demonstrate that they will work with us, to achieve the minimum standards set out herein. We further expect our suppliers to encourage and work with their suppliers and subcontractors to ensure they also strive to meet the principles of this SCC or equivalent set of principles.

2. Corporate Governance

The Singtel Group embraces the core principles of the UN Global Compact and have incorporated the guidelines as critical areas of supplier operations that are central to our environmental and social performance. A comprehensive list of our policies is located at <https://www.singtel.com/about-us/company/corporate-governance>.

The critical areas detailed in this SCC are:

- Business Ethics
- Human Rights and Modern Slavery
- Workplace Health and Safety
- Environmental Management
- Supplier Management

For each of these areas, we have set forth minimum requirements for our suppliers. Compliance with these standards, as relevant to the type of goods and/or services supplied, is mandatory and any material non-compliance will entitle the Singtel Group to terminate its business relationship with the supplier.

3. Business Ethics

3.1 General

Singtel Group suppliers shall comply with all relevant international and domestic laws related to ethical business practices and shall demonstrate the existence of policies and procedures or a clear intent, to prevent the following as set out in this section.

3.2 Anti-Corruption

Singtel Group suppliers must adhere to the highest standard of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including extortion, fraud, or bribery. We adopt a zero tolerance approach to bribery and corruption as described in our [Anti-Bribery and Corruption Policy](#).

3.3 Anti-Competitive Practices

Singtel Group suppliers must comply with anti-trust and fair competition laws. Acts of collusion, cartel, price fixing or other anti-competitive practises are strictly prohibited and if so discovered will be grounds for the supplier to be debarred from further business engagements with the Singtel Group.

3.4 Conflict of Interest

Situations that create a conflict of interest or the perception thereof must be avoided. Suppliers must disclose any actual or potential conflict of interest to the Singtel Group.

4. Human Rights and Modern Slavery

4.1 General

Singtel Group suppliers must comply with all local and national laws, in line with international standards on labour and human rights, including but not limited to the UN Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, UN Convention on the Rights of the Child and ILO Conventions with regard to labour and human rights, including modern slavery in any form.

As stipulated in the [Singtel Human Rights](#) and [Optus Modern Slavery Statements](#), the Singtel Group prohibits the use of all forms of slavery, servitude, forced labour, trafficking in persons (including orphanage trafficking of children), forced marriage, child labour, debt bondage, and other slavery like practices (Modern Slavery) in our business operations and supply chains. The Singtel Group is committed to operating in a manner consistent with national and international Modern Slavery laws. Singtel Group expects its suppliers to refrain from participating in, and to implement measures that prevent, slavery and the use of forced, bonded, or child labour in their operations and supply chains. Additionally, suppliers are required to demonstrate due diligence in mitigating Modern Slavery and human rights risk.

The Singtel Group requires its suppliers to uphold equal opportunities, freedom of association and the effective right to collective bargaining for its employees. Suppliers must have an internal system to remunerate employees fairly and responsibly, and a grievance mechanism and process for employees, suppliers, and customers.

4.2 Labour Rights

Singtel Group suppliers must prohibit any use of forced, bonded, indentured, or involuntary labour, and embrace employment practices consistent with ILO conventions pertaining to forced labour and Modern Slavery laws. All work, including overtime work, must comply with applicable laws and/or collective bargaining agreements with respect to working hours and must be voluntary. Workers must be free to leave upon reasonable notice. Where housing is required as part of employment terms, suppliers must provide their employees adequate housing/living conditions according to applicable laws, and suppliers should also not mandate that workers hand over government-issued identification, passports or work permits as a condition of employment.

4.3 Fair Wage

We are committed to paying a fair wage to our employees that is commensurate with their job role, skills, and performance. Every worker has a right to compensation for job performed. Our suppliers must pay at least the minimum or prevailing wage, whichever is higher, to comply with local laws, including fringe benefits if applicable. If the compensation paid does not meet the workers' basic needs and provide discretionary income, our suppliers must take remedial actions to realise a satisfactory level of compensation.

4.4 Child Labour

Child labour is strictly prohibited. Suppliers shall not employ children. The minimum age for employment or work shall be the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher. Singtel Group suppliers must not to engage in any practice inconsistent with the rights set forth in the Modern Slavery laws, Convention on the Rights of the Child, the ILO Minimum Age Convention (C.1381973) or the Prohibition and Immediate Elimination of the Worst Forms of Child Labour Convention (C. 1821999).

4.5 Anti-Harassment and Abuse

The Singtel Group expects its suppliers to support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses. The Singtel Group requires its suppliers to have policies in place that prohibit unlawful discrimination and harassment, ensuring a safe and inclusive work environment. These policies must foster and maintain an environment that treats all employees with dignity and respect. Singtel Group suppliers are also expected to refrain from using any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse. Harsh or inhumane treatment, coercion, or corporal punishment of any kind along with any threats of any such treatment are strictly prohibited.

4.6 Anti-Discrimination

Singtel Group suppliers' employment practices must not discriminate with respect to race, colour, sex, religion, political opinion, age, sexual orientation, or disability. Employment must be awarded on merit or the inherent requirements of the job.

4.7 Diversity and Accessibility

Singtel Group values inclusion and diversity. This extends to our supply chain and their suppliers. Striving to ensure that our business is accessible by design, begins with Singtel Group suppliers. We believe that diversity considerations must encompass various aspects, including background, ability or disability (invisible & visible), gender, age, religion, neurodiversity, and life experiences, ensuring that these are all present in both our workplace and supply chain. Singtel Group aims to promote diversity in our supply chain by working with suppliers that:

- support gender equality focused on female gender representation
- are indigenous groups or minority owned organisations (based on location, i.e. First Nation certified organisations for Australian based operations)
- prioritise and support individuals with disabilities
- partner with social enterprises that support community priorities based on their location of operations
- advocate for fair trade and ethical employment.

4.8 Due Diligence and Risk Management

The Singtel Group has measures throughout its procurement procedures, including in supplier contracts and invitations to tender, to ensure respect for human rights. Suppliers will not be contracted if they are alleged to have committed, or have committed, offences in relation to Modern Slavery and human trafficking, or if they are alleged to have breached or have breached, any Modern Slavery and anti-human trafficking laws.

To the extent that a supplier has any concerns with the requirements of this SCC or believes that they could potentially be in breach of any aspect, it is the supplier's obligation and responsibility to proactively inform the Singtel Group of these risks or issues.

The Singtel Group is committed to high standards of corporate governance and accountability in its affairs. As reflected in our [Whistleblower Policy](#), Singtel Group suppliers are encouraged to raise any grievances, suspicions of fraud, corruption, violations related to humans rights, or any form of unethical conduct to our independent Whistleblower hotline. This hotline allows for Singtel Group suppliers, contractors, and other eligible persons to report a grievance or concern. They will then be investigated by a suitable team. Singtel Group commits to protecting the confidentiality of all complaints and ensure that complainants are protected from detriment or retaliation. We expect that you, as a supplier to the Singtel Group, ensure that your organization protects your employees from detriment because they want to, or have made a report under the Whistleblower Policy or are suspected of having done so.

The Singtel Group will conduct due diligence of our business and of our suppliers to assess compliance with our Singtel Group Supplier Code of Conduct, as well as our human rights, environmental and governance standards. As part of this process, we may audit new and existing suppliers, including subcontractors within the supply network. Such audits may be conducted by Singtel Group or by an independent auditor selected by Singtel Group. The auditor will act under Singtel Group's direction, and the supplier is expected to provide full cooperation, including access to relevant records, systems, personnel, and premises as reasonably required. If the audit reveals material non-compliance, the Supplier shall promptly take corrective action.

4.9 Conflict Materials

All Singtel Group suppliers must comply with applicable conflict minerals regulations. Suppliers must undertake measures to ensure that raw materials are responsibly sourced and metals from conflict areas including, but not limited to, tin, tantalum, tungsten and gold, or derivatives of these minerals (per the OECD Due Diligence Guidance for responsible mineral supply chains), do not enter its supply chain.

4.10 Data Privacy

The Singtel Group takes the privacy and data security of our customers and staff very seriously and we require our suppliers to protect data and uphold our privacy requirements and obligations. Where applicable, suppliers must implement administrative, physical, and technical safeguards that are no less rigorous than accepted industry practices on cybersecurity such as ISO27002, NIST Cybersecurity Framework, or other similar industry standards for cybersecurity. Any breaches must be reported immediately and transparently.

5. Workplace Health and Safety

The Singtel Group's approach to Health, Safety and Security proactively supports the physical, emotional, and financial wellbeing of our staff to create a positive environment for our staff, customers, and the communities in which we operate. We value open communication and seek to establish relationships that are based on integrity and trust. Our commitment to creating a safe and healthy work environment for all staff is described in our [Singtel Group Health, Safety and Security Policy](#). We require our suppliers to comply with Singtel Group workplace safety and health requirements for physical work, whilst developing and implementing similar health, safety, and security practices in all aspects of their business, providing a healthy and safe working environment for its employees.

6. Environmental Management

6.1 General

The Singtel Group suppliers must comply with all local and national laws, in line with international standards on environmental practices. Singtel Group suppliers are also required to work with us to ensure the Group utilises best practice approaches in environmental management, which consider cost effective solutions, take into account use of raw materials, and reduce waste. The Singtel Group also expects suppliers to adopt effective environmental management practices, and maintain an Environmental Policy outlining their commitment to environmental sustainability.

6.2 Precautionary Principle

In line with our [Singtel Group Environment Policy](#), all Singtel Group suppliers must comply with existing legislation and regulations regarding the protection of the environment in the countries where they operate. Suppliers should adopt a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies implementing sound lifecycle and circular economy practices.

6.3 Carbon Emissions

Upon request, Singtel Group suppliers shall take steps to identify, monitor and reduce emissions with the intent to achieve year-on-year decline in greenhouse gas emissions to collectively keep global rise of temperatures to 1.5°C or less. All efforts should be made by suppliers to reduce greenhouse gas outputs through energy performance and efficiency measures. Upon request (and where practicable) suppliers must provide reporting data on third party transportation and distribution of products, including between a company's tier 1 suppliers and its own operations, and between the point-of-sale and the end-consumer (including retail and storage).

6.4 Waste and Packaging

Singtel Group suppliers must comply with local, national, and international laws (e.g. Basel, Stockholm, and Rotterdam Conventions) in relation to hazardous wastes, persistent organic pollutants, and hazardous chemicals. In the production, maintenance, and disposal of goods, and within the standard business practices of the Singtel Group and its suppliers, the Singtel Group seeks to:

- reduce and minimise waste of all types
- encourage and promote the recycling and re-use of materials

We expect our suppliers to use the minimum packaging that is consistent with safe, hygienic, and protective transport of goods. It is expected that suppliers will identify and use packaging that is recyclable and efficient.

6.5 Product Stewardship

The Singtel Group expects its suppliers to consider the end-of-life treatment of products and provide information on supplier take-back schemes; feasibility and cost of removal/destruction of products; raw materials; smart design; fuel and water consumption; and emissions and energy in products.

Throughout the end-to-end manufacturing, transportation, operation and maintenance of their products, suppliers are asked to undertake the manufacturing of goods with due consideration to environmental responsibility in the:

- extraction and use of raw material
- smart design of the products
- consumption of fuel and water
- amount of carbon emissions created
- energy required to extract, create, transport, operate and dispose of products

6.6 Material and Manufacturing

Singtel Group suppliers shall eliminate the use of materials that contain harmful substances, including but not limited to those listed in the European REACH Restricted Chemical List, while also ensuring adherence to RoHS certification standards.

7. Supplier Management

7.1 Performance Reporting

In keeping with best practice reporting standards and applicable regulatory requirements, reporting on environmental and social performance to key internal and external stakeholders in a transparent and honest manner is an expectation the Singtel Group has of all its suppliers. Suppliers are encouraged to incorporate management of, and reporting on, the progress of their sustainability plans, diversity initiatives as well as workplace practices and policies as part of their normal business operations. These reports must be provided to the Singtel Group if available, and upon request.

7.2 Information Sharing

The Singtel Group expects its suppliers to influence and engage with their own suppliers to achieve the objectives outlined in this SCC.

7.3 Monitoring and Evaluation

When requested, suppliers must provide honest and transparent responses to the Singtel Group Supplier Self-Assessment. The Singtel Group may, from time to time, conduct onsite evaluations and inspections of its supplier's facilities, and those of their subcontractors supporting Singtel Group's operations, to review the supplier's compliance against this SCC.

7.4 Grievance Mechanism

Suppliers are encouraged to raise any grievances or report any suspected violations of the SCC and Singtel Group's policies to its Singtel Group business contact, or to our independent Whistleblower hotline. Details of our Whistleblower Policy and hotline may be found at: <https://www.singtel.com/about-us/company/corporate-governance/whistleblower-policy>

We specifically note our requirement set out in Section 4.8 above that persons in your organization that wish to make, have made or are suspected of having made a complaint under the Whistleblower Policy are protected from detriment or retaliation.

7.5 Further Information

If you have questions about this SCC, please contact Singtel Procurement at email: grpproc@singtel.com