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SUSTAINABILITY REPORT 2018

OOREDOO MALDIVES PLC

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I am pleased to confirm that Ooredoo Maldives reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact & its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders using our primary channels of communication.

Ooredoo Maldives' vision is to enrich lives as a digital enabler, thus connecting our communities to new opportunities for progress. As we continue to grow and achieve new breakthroughs in the Maldives, our focus on sustainability remains at the core of everything that we do.

It's an honor to highlight the work done to manage our economic, social and envi ronmental impact, aligned with our corporate values of Caring, Connecting Chal lenging, our work to support the United Nations Sustainable Development Goals ("SDGs") and the Ten Principles of the United Nations Global Compact ("UNGC") of which we have been a signatory since February 2012.

Our work in these areas would not have been possible without the dedication and passion with which the Ooredoo Maldives team volunteered their time and efforts for our community engagement projects.

As we look towards 2019, I remain confident that we will continue to support the digital lifestyles of our people, communities and businesses in the Maldives through sustainable technologies and services.

Najib Khan Chief Executive Officer Ooredoo Maldives



COMMITMENT TO ACHIEVING THE SUSTAINABLE DEVELOPMENT GOALS

In October 2015, Ooredoo Maldives pledged its commitment to the United Nations Sustainable Development Goals ("Global Goals"), which aims to eradicate extreme poverty, improve the lives of people and create an all-round healthier world for tomorrow.

The 2030 Agenda for Sustainable Development, adopted by all United Nations Member States in 2015, provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. At its heart are the 17 Sustainable Development Goals ("SDGs"), which are an urgent call for action by all countries - developed and developing - in a global partnership. They recognize that ending poverty and other deprivations must go hand-in-hand with strategies that improve health and education, reduce inequality, and spur economic growth – all while tackling climate change and working to preserve our oceans and forests.

These are ambitious targets which cannot be achieved without fully leveraging the reach and capabilities of mobile technology. Ooredoo Maldives continues its work to stimulate human growth and contribute to the sustainable development of local communities across the nation.

With a strong belief in the transformative power of digital, Ooredoo Maldives is strongly aware of the role that it can play in supporting the achievement of the 2030 Agenda for Sustainable Development Goals; focusing on good health and well-being, quality education, gender equality, innovation, reduced inequalities, sustainable cities and climate action.



DONATION OF SEA AMBULANCES

Ooredoo Maldives donated 3 sea ambulances to the Ministry of Health in the Maldives. The donation comes following the Company's earlier commitment to support the Government of the Maldives in providing quality healthcare to its citizens.

The donation aims to support the nation's existing sea ambulance fleet, which operates from across the country and plays a vital role in delivering health care to people living throughout the highly dispersed islands.

This partnership is being taken even further with the introduction of Mobile Health Clinics program in the Maldives, with the support of the Ministry of Health, the Maldives National Defence Force and the Maldivian Red Crescent. A global initiative undertaken by the Company, Ooredoo Mobile Health Clinics travel to rural and remote communities to provide free medical treatment, share nutritional advice and distribute vitamins. The program aims to play an educational role, teaching parents and children about the importance of a healthy lifestyle and of disease prevention. Along with its partners, Ooredoo Maldives aims to expand this program to smaller islands in the Maldives, which can truly benefit from the program.



Online Survey

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baseline

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SMART CITIES PROJECT

Ooredoo Maldives in partnership with UNDP Maldives and the Housing Development Corporation ("HDC") launched the 'Smart Cities' Project which aims to offer innovative, smart solutions for urban challenges through ensuring that the technological solutions introduced in Hulhumale' - the future smart city, remains inclusive and accessible to all of its population.

Our initiatives are aimed to positively impact all residents of Hulhumale' particularly vulnerable groups such as women and youth, people with disabilities and the elderly. Our initial focus will be on the aspects of smart people, smart living and smart mobility.

A NUMBER OF INITIATIVES WERE CARRIED OUT UNDER THIS PROGRAM:

SMART CITIES BASELINE ASSESSMENT

This was an assessment conducted as part of the Smart Cities Project to create a baseline, in order to understand how community-level interventions or housing management improvements could create a better life for people in Hulhumale'. The survey collected information in 4 major areas including the demography, lifestyle, living standards and the challenges faced by the population living in Hulhumale'. The survey also aims to understand the vision of Maldivians for Hulhumale'. The aggregated data from the survey after analysis was shared with the respective stake-holders and defined next steps in the Smart Cities Project.



SMART INCLUSIVITY CAMPAIGN:

The Smart Inclusivity Campaign was continued to promote inclusivity within Smart Cities. The campaign focuses on persons with disabilities as both beneficiaries and agents of change, who can fast track the process towards inclusive and sustainable development. Public announcement videos were created with support from the Maldives Association of Physical Disables ("MPAD"), the Blind Association of Maldives and the Maldives Deaf Association to create awareness.



CODING CAMP:

Arming young people with the knowledge of coding could lead them to use technology to develop unique solutions for their everyday challenges they face within their communities. As such, a Coding Camp was successfully held during the mid-semester break, for students between 10 to 15 years in age.



SCI-TECH FESTIVAL:

Ooredoo Maldives' Sci-Tech Festival returned in March 2018, this time in collaboration with UNDP Maldives & HDC. In this digital world, science and technology have become a crucial component in ensuring a better future. It is important to inspire the next generation of innovators through initiatives which make young girls and boys excited about science and technology. SciTech Kids Festival focuses on just that, with fascinating experiments, interesting exhibits and exciting games for children.

PROMOTING DISABILITY INCLUSIVE DEVELOPMENT FORUM



This was a first forum of its kind to discuss how to make development disability-inclusive and was held in June 2018 with the aim of reviewing and improving accessibility and inclusivity of Persons with Disabilities. Evidence and experience shows that Persons with Disabilities continue to experience barriers to participation in all aspects of society. When barriers to their inclusion are removed, Persons with Disabilities are empowered to participate fully in societal life, and the entire community benefits. Even though the Maldives Disability Act enacted in 2010 emphasizes on accessibility, there remain shortfalls and challenges in the implementation of it. This forum assisted in nurturing a culture where multiple stakeholder's takes into account the various challenges faced by Persons with Disabilities, and find ways on removing barriers that prevent this.



URBAN INNOVATION CHALLENGE

The theme of the Urban Innovation Challenge focused on Hulhumale', is "Solutions for Public Services, Increasing Urban Resilience" while the main focus points of the program will be social housing, urban mobility and urban waste reduction and management. The challenge provides an opportunity for Maldivian youth to work with respective organizations, to co-create solutions to urban challenges by strengthening technological and innovative mechanisms to increase urban resilience.



NIRU ACCELERATOR PROGRAM

Ooredoo Maldives launched NIRU Accelerator, a first of its kind learning based business accelerator program in the Maldives, for innovative start-ups run by Maldivian entrepreneurs who are passionately working towards social change.

Interested innovators took part in the entry point for the accelerator program – the Ooredoo Maldives Hackathon which took place from 31st August to 1st September 2018. The Hackathon guided participants on idea generation, foundations of business, and provide the digital tools to build an initial prototype.

Teams that passed through to NIRU Accelerator gains access to seed funding, a 12-week long intensive mentor based learning program, co-working space, digital tools for building their business and the essential technical support from experts. This includes access to the Ideamart platform which allows developers and content providers to use the Ooredoo network based features via shared APIs, and monetize their efforts. At the end of the program, start-ups also receive the chance to pitch for further investments. NIRU Accelerator also connects participants to lifelong partnerships and opportunities even after the end of the accelerator program, making them part of a vibrant community working towards a better world.



MIYAHELI SOCIAL INNOVATION CAMP

Ooredoo Maldives partnered with the United Nations Development Programme ("UNDP") in the Maldives to launch "Miyaheli", the Social Innovation Camp for youth from 5th to 8th July 2018 in V. Thinadhoo. This is the third collaboration for this Social Innovation Camp. The first Miyaheli was held in 2016.

This year, Miyaheli was open for Maldivian youth aged 18-30 years from the Greater Male' region. The five thematic areas for this year were: creating a peaceful and tolerant community; increasing women's voices; using new technology to create successful businesses; building youth movements; and creating green innovation.

Miyaheli brought together ideas from the youth and used digital and non-digital tools to create both tech-based and non tech-based social innovations to pressing social issues, all in just one weekend. Two teams were awarded mentorship and training opportunities by the Business Centre Cooperation, as well as US\$ 3000 seed funding from Ooredoo Maldives and UNDP Maldives.



DIGITAL LITERACY PROGRAM

Ooredoo Maldives strongly believes in the power of digital communications in enriching lives and that it is something that everyone should have access to. The world is becoming increasingly digital, from the way people communicate to everyday activities such as paying bills, getting access to healthcare and more. It is imperative that nobody gets left behind.

In partnership with Women on Boards, the Digital Literacy Program was initiated as part of Ooredoo Maldives' digital inclusivity strategy and its work to support a Digital Maldives. The program focused on teaching digital skills to senior citizens, from how to use a smartphone and the latest apps, to ensuring their safety while using mobile phones and internet. This program is a long term project by Ooredoo Maldives, which is being continued across the Maldives.



WHITELISTING OF WEBPAGES OF NGOS

As per a pledge made by the CEO Mr. Najib Khan at the Promoting Disability Inclusive Development Forum, Ooredoo Maldives whitelisted the webpages of selected NGOs & organizations which work towards achieving SDG's. This will allow members of the public to access the webpages without any data charges, thus allowing them to stay connected & up to date with the NGO's activities.



PARTNER FOR ALLIED COMMUNITY DEVELOPMENT HUB

As a start to the Premium for Good initiative, Allied Insurance and UNDP Maldives along with Ooredoo Maldives will be working together under the community Hubs project where vulnerable communities are able to acquire technological skills which broaden their horizons, additionally prepares them for jobs which require computer literacy and also trains them to create localized solutions at the training.

The first community Hub was launched in B. Maalhos in September 2018. In addition to providing internet support to the community center, Ooredoo Maldives will also be providing internship opportunities to youth who receive training at the center.



AWARENESS CAMPAIGN FOR SCAM CALLS

Ooredoo Maldives launched an awareness campaign for scam calls, with a PSA video and social media messaging. As society becomes more and more dependent on smart phones, the campaign aims to make the community less susceptible towards digital fraud.



CELEBRATION OF INTERNATIONAL DAY OF HAPPINESS

Since 2013, the United Nations has celebrated the International Day of Happiness as a way to recognize the importance of happiness in the lives of people around the world. In 2018, Ooredoo Maldives joined the celebration with "Smile" cookies which were distributed to people in various parts of the Maldives, to create awareness of the day and show that even a little act of kindness can bring joy to people.



EARTH HOUR CELEBRATION

Ooredoo Maldives celebrated Earth Hour by switching off lights during the launch of Samsung Galaxy S9 in the Maldives, in solidarity with global efforts to secure nature and our home. The event also included a candlelit music show during Earth Hour.



INTERNATIONAL WOMEN'S DAY CELEBRATION

Ooredoo Maldives and UNDP Maldives together hosted a special talk for students on the occasion of International Women's Day 2018, featuring the Director of the United Nations Information Centre in Tokyo, Ms. Kaoru Nemoto. The event aimed to create conversation regarding challenges for young girls as they enter the work force and to inspire them to overcome these issues and achieve their dreams, whatever that may be.



DIFFERENT, NOT LESS EVENT, FOR AUTISM AWARENESS

Ooredoo Maldives was proud to support "Different, Not Less". This was an educational and awareness program about children with special needs for the people of M. Dhiggaru.



ENIGMA EXHIBITION, FOR CANCER AWARENESS & FUNDRAISING

Ooredoo Maldives was the Innovation Partner for Enigma Exhibition, which acted as a platform for the Cancer Society of Maldives ("CSM") to spread awareness on cancer and to raise funds through proceeds from paintings sold at the exhibition.



CELEBRATION OF CHILDREN'S DAY, WITH NEW RADIANT S.C

Ooredoo Maldives hosted a very special football match between New Radiant S. C and 60 young football enthusiasts, to celebrate World Children's Day 2018. The match featured 60 kids playing against 6 professional players from New Radiant S.C, with the "Varah Thafaathu Kids" team winning 7-0. The special match was held in the spirit of World Children's Day, and as a unique way for Ooredoo Maldives and New Radiant team to promote a love of football among young children.



EID CELEBRATION WITH OOREDOO MALDIVES

Ooredoo Maldives held a public event on Eid-ul Fitr, to celebrate the blessed occasion with its customers and the people of Maldives. This included eid gifts, as well as Bodu Beru music featuring brand ambassador, Habeys Boduberu Group.



FISHERMEN'S DAY CELEBRATIONS

As part of this year's Fishermen's Day celebrations, Ooredoo Maldives connected all fishermen across the Maldives with "Masveringe Package", customized to suit the varying needs of the modern day fisherman. These special packages allow free unlimited calling within the local fishermen community and comes with great benefits including great data allowances, as well as free Viber and Twitter on the best network for fishermen in the Maldives. Additionally, we also contributed to the official celebrations for Fishermen's Day 2018 by the Government of Maldives, including support to a children's event in GA. Gemanafushi.



DISASTER RELIEF

As an active supporter of GSMA's Humanitarian Connectivity Charter, demonstrating the commitment of the mobile industry to support customers and responders before and during humanitarian emergencies, Ooredoo Maldives remains committed to implement the disaster response initiative to ensure effective and predictable response during times of crisis.

Ooredoo Maldives was among the first corporates in the Maldives to volunteer their support in times of crisis; such as the water crisis in Male', the devastating earthquake in Indonesia, the Mecca crane collapse, the stampede in Mina, the power crisis in Thinadhoo and recently, the flood-ing in Male'.

The Company has contributed both in terms of monetary donations, active participation as volunteers during recovery efforts, and by utilizing mobile technologies to provide support to those affected. This also includes the provision of free calls to get in touch with friends and family, creating awareness to bulk messaging, using location based technologies to track recovery vessels etc.

Our People

Our talented, diverse and multi-cultural pool of employees are the key driving force behind our continued business growth and success. Our human resource strategy focuses on attracting the best talent, employee retention and development of employees by providing training opportunities. As a Company we are committed in motivating and providing a safe and appropriate working environment for our employees.

The Company has retained the employee turnover rate at a healthy 6% since 2016 and at the end of 2018, our total employee strength amounted to 360 of whom 335 (93%) were Maldivians, demonstrating the Company's commitment towards the community and local talent development.

TRAINING AND DEVELOPMENT

Our human resource strategy aims on creating a robust employee base with a strong skillset to cater for the current and future needs of the Company. During 2018, several training and development programs have been conducted including leadership development programs, succession planning, professional qualifications and soft skills development. Additionally, we continue to invest in employee academics upscaling, with 9 employees enrolled in Degree and Diploma Programs in 2018. We conducted a total of 28 training programs for 886 participants in technical and non-technical areas, during 2018.

EMPLOYEE WELLBEING & ENGAGEMENT

We continue our efforts in motivating the employees by focusing on employee wellbeing and entertainment which encourages them to perform better at the workplace. In 2018, numerous events were organized to improve internal communications, foster a culture of teamwork and create a happy and engaged work force:

Events were organized to boost teamwork, encourage innovation and creativity and bring the entire company together in an informal environment. This included the MNP Market Storm Challenge, m-Faisaa Week, inter-department challenges such as the CEO Cup and the Anniversary Monument Challenge.

Our employees also represent the Company in various national / community level sports events such as Club Maldives Cup 2018, Youth City Futsal 2018, Villi Muassasa Cup 2018, Inter Office Futsal Challenge. Brigade, inaugurated in 2015 run by our energetic employees, held a wide range of new innovative activities aimed at developing various skills and competencies. Key events held in 2018 were the Anniversary Monument Challenge to encourage creativity, and innovative ideas, Brigade Waste Management Challenge to sensitize on national waste management initiatives while also bringing out an innovative mindset, Brigade Battlefield Challenge focused on critical thinking and decision making, Brigade Mas Race Challenge, Brigade Debate Challenge to refine public speaking skills, PES Challenge to bring out the youthful digital gaming skills. The Annual CEO Cup was held as an inter-department challenge to revitalize the functional spirit.

As part of giving back to our community, Ooredoo Maldives' employees took part in the Sci-Tech Festival, beach side cleaning in HDh. Kulhudhufushi, Blood Donation Camp, SaafuRajje project – Artificial Beach clean up. The team also commemorated local and international days such as National Day, Men's Day, Women's Day and Children's Day.

Ensuring effective internal communications across teams continues to be a priority for Ooredoo Maldives. Key initiatives held during the year to encourage clear and open communications within all levels of the Company include:

We Are One Team: a monthly interactive gathering of employees who celebrate their birthdays within the month along with the Management team, to share ideas and suggestions.

Employee Communication Forum: a bi-annual formal gathering with all employees to share strategic plans, work progress as well as recognize and reward employees.

Town Halls: All employee meetings to update on strategic initiatives, milestones and the way forward.

DIGITAL HR AND OUR WAY OF WORK

We believe that the agile way of work is a mindset and that working in small groups wherein any task can be ideated, executed and monitored in a quick and efficient manner. This year, we created Small Business Units ("SBU") to drive the key business imperatives successfully and efficiently.

We also embraced digital way of working by leveraging technology in people management processes and practices. Automation and analytics are integrated into the fabric of everyday business. In this regard, Performance Management System was implemented to support ongoing communication between the employees and their managers, as well as real time review process. This enables managers to review with employees their progress against targets, to identify any obstacles, and to provide support and feedback. We benchmark our performance management standards against those of peers and leading multinationals.

We also implemented our E-Learning system where employees can take part in online trainings, access referral materials on E-Library anywhere any time to refresh and hone skill sets.

Kudos instant reward programme was made E-Kudos in 2018. E-Kudos enables peer-to-peer recognition and fosters a performance culture that reflect the Company values (Caring, Connecting, Challenging).

Our HR procedures won several awards in 2018 including the Global HR Excellence Award for Best Strategy in line with Business, Global Best Employer Brand for Excellence in HR through Innovation, Global Best Employer Brand for Talent Management, Asia's Best Employer Branding Awards 2018 for Dream Company to Work for and the Maldives HR Award for Excellence in Leveraging HR Technology.



The Ten Principles of the United Nations Global Compact

HUMAN RIGHTS

PRINCIPLE 1:	BUSINESSES SHOULD SUPPORT AND RESPECT THE PROTECTION OF INTERNATIONALLY PROCLAIMED HUMAN RIGHTS
PRINCIPLE 2:	MAKE SURE THAT THEY ARE NOT COMPLICIT IN HUMAN RIGHTS ABUSES
	LABOUR
PRINCIPLE 3:	BUSINESSES SHOULD UPHOLD THE FREEDOM OF ASSOCIATION AND THE EFFECTIVE RECOGNI- TION OF THE RIGHT TO COLLECTIVE BARGAINING
PRINCIPLE 4:	THE ELIMINATION OF ALL FORMS OF FORCED AND COMPULSORY LABOUR
PRINCIPLE 5:	THE EFFECTIVE ABOLITION OF CHILD LABOUR
PRINCIPLE 6:	THE ELIMINATION OF DISCRIMINATION IN RESPECT OF EMPLOYMENT AND OCCUPATION

ENVIRONMENT

PRINCIPLE 7:	BUSINESSES SHOULD SUPPORT A PRECAUTIONARY APPROACH TO ENVIRONMENTAL CHAL- LENGES
PRINCIPLE 8:	UNDERTAKE INITIATIVES TO PROMOTE GREATER ENVIRONMENTAL RESPONSIBILITY
PRINCIPLE 9:	ENCOURAGE THE DEVELOPMENT AND DIFFUSION OF ENVIRONMENTALLY FRIENDLY TECHNOLOGIES

ANTI-CORRUPTION

PRINCIPLE 10: BUSINESSES SHOULD WORK AGAINST CORRUPTION IN ALL ITS FORMS, INCLUDING EXTORTION AND BRIBERY

UNITED NATIONS GLOBAL COMPACT HUMAN RIGHTS PRINCIPLES

Principle 1:

Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2:

Make sure that they are not complicit in human rights abuses.

Ooredoo Maldives is committed to ensuring the health and safety of our employees and have guided our employees to take appropriate actions and promptly report incidents that are likely to result in health and safety concerns. The Company issues personal protective equipment and has safety work instructions for all hazardous activities.

FAIR TREATMENT & WORKPLACE WITHOUT HARASSMENT

The policies and procedures of Ooredoo Maldives are designed to ensure fair treatment of all employees in a consistent manner, with respect to assigning of work, remuneration, career development and other employment related matters. The Company policy prohibits harassment of any form within the work environment and prohibits retribution against any employee who lodges such a complaint.

MEDICAL INSURANCE & RETIREMENT BENEFITS

All permanent employees and their immediate family are provided with medical care, under the insurance scheme of Ooredoo Maldives. Since the establishment of the Company in 2005, Ooredoo Maldives has been successfully providing medical insurance to employees upon the completion of their probation period.

Implementation.

Company policies and procedures are shared with all employees upon handover of the employee contract, as well as during the orientation program for new joiners

Annual First Aid Trainings, Maritime Trainings and Fire & Safety Trainings conducted for relevant employees

All employees are given medical insurance, and registered under the retirement benefit fund

UNITED NATIONS GLOBAL COMPACT LABOUR PRINCIPLES

Principle 3:

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4:

The elimination of all forms of forced and compulsory labour.

Principle 5:

The effective abolition of child labour.

Principle 6:

The elimination of discrimination in respect of employment and occupation.

EQUAL OPPORTUNITY TO ALL

All applicants and employees of Ooredoo Maldives are given equal opportunities in employment, training and career advancements, irrespective of their race, color, marital status, parental status, ancestry, source of income, religion, gender, age, national origin or handicap. The Maldives is a signatory to the Universal Declaration of Human Rights, and Ooredoo Maldives complies with all local laws and regulations and respect the culture, values and human rights within all aspects of our operations.

Implementation.

Company policy clearly adheres to the Maldives Employment Act to guarantee the elimination of forced and compulsory labor, the effective abolition of child labor and the elimination of discrimination, in respect of employment and occupation.

Efforts are made to increase gender diversity across all functions and levels, under the Ooredoo Group led Gender Diversity Program in partnership with She Works. This includes encouraging female entrants for relevant postings during the recruitment stage, training and development, mentorship opportunities, etc.

UNITED NATIONS GLOBAL COMPACT ENVIRONMENT PRINCIPLES

Principle 7:

Businesses should support a precautionary approach to environmental challenges.

Principle 8:

Undertake initiatives to promote greater environmental responsibility.

Principle 9:

Encourage the development and diffusion of environmentally friendly technologies.

Implementation

We help to protect our planet by implementing green practices within our business activities.

Ooredoo Maldives continues to implement green practices in their internal and external dealings, in order to reduce the Company's carbon footprint. This includes the introduction of e-Bills, installation of eco-friendly lighting, and more.

In helping to protect our planet, Ooredoo Maldives was the first company in Maldives to introduce the modern Single Radio Access Network ("RAN") equipment. 100% of our sites have now been modernized with Single RAN equipment, successfully saving 54% in electricity consumption and 80% in carbon footprint.

Company-wide "Go Green" program carried out to encourage environment friendly practices and to reduce wastage of resources such as electricity, water, paper, etc. The Go Green program is well received by employees, leading to a significant reduction in electricity charges.

Abolishing the usage of single use plastic water bottles within the office, which allowed the Company to eliminate the use of over 23,000 plastic water bottles in 2018 alone.

UNITED NATIONS GLOBAL COMPACT ANTI-CORRUPTION PRINCIPLES

Principle 10:

Businesses should work against corruption in all its forms, including extortion and bribery

We have strong policies to eliminate corruption inclusive of:

SUPPLIERS

Employees must interact with suppliers or vendors with honesty and integrity. Decisions to purchase products and services shall be based on the Company's interest, taking into account factors such as quality, price, performance, suitability, and reliability. Employees who are required to engage in dealings with regard to purchasing of assets, items and equipment's or obtaining services from suppliers, vendors and service providers should avoid conflict of interest or appearance of any conflict of interest.

CONFLICT OF INTEREST

Employees shall not practice any business or trade, which is in conflict with their duties, or with the Company's interest or which may cause the employee to have a direct or indirect interest in any contracts or works related to the Company's activities or to which the Company is a party.

The Company policy requires that employees avoid any situation that creates a conflict of interest between the employee's own interest and that of the Company. Employees shall ensure that their activities during and after office hours do not conflict with their duties or with the Company's interest. The employee should inform the Management in case any activity or situation creates a conflict of interest.

It is the responsibility of the employee to declare any business interests that may or may not create any conflict of interest.

Implementation

Policies regarding anti-corruption are shared by HR, upon employment offer and contract signing, as well as during induction trainings for new employees. Annual Internal Audits are conducted to prevent corruption and bribery.

A Disciplinary Committee is assembled to carry out non biased investigations upon any reports of fraud, bribery or corruptions.

Measurement of Outcomes for Implemented Procedures

Introduction of the Policy on Whistleblowing to ensure the receipt, analysis and processing of reports of violation of laws, regulations, policies, decisions, instructions, code of conduct or ethics in the Company. In addition to the problems that occur in the system of internal control, maintaining the confidentiality of Company information and fraud attempts, this includes any errors that could have a negative impact on the Company, Ooredoo Group, employees, customers, investors, shareholders or others in general.

The whistleblower reporting is controlled by the Internal Audit Department of Ooredoo Maldives, whereby information related to the whistleblower and reported issues will kept confidential.

An Employee Engagement Survey is carried out on an annual basis, through which employees are able to report any discomforts, distresses or wrongdoings on a confidential basis. The survey is carried out by an external party to ensure its confidentiality, and reviewed by HR, Management and the Ooredoo Group.

Digital feedback mechanism introduced on the Company intranet, allowing instant reporting to the Human Resources Department.

No relevant reports have been filed on any of the above mentioned areas in 2018.

