

# Sustainable & Equitable Access For All



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## Sustainable & Equitable Access For All

The cover features edotco’s tower emerging from the lush greenery - signifying the emergence of new leadership to connect the unconnected in a sustainable, balanced way. Our people humanises the message and celebrates edotco’s employees as our core strength.

“ Appreciation to all Our Stakeholders.  
Thank you for being a part of our Sustainability journey. ”

### Feedback

We continually aspire to improve our reporting quality and welcome constructive comments or questions about this report via the following contact:

Email:  
Director of Governance, Risk and Compliance  
communications@edotcogroup.com



## About Our Inaugural Sustainability Report

edotco Group is committed to sharing the progress of our Sustainability journey and setting the highest standards in the social, economic, and environmental performances of our Group of companies. We aspire to raise our understanding of Sustainability issues so that we may continue to grow and perform better as a corporate citizen.

We have identified our initial Sustainability approach and will continue to review this approach by exploring the various ways in which we can improve our Sustainability practices and performances across our management and operations.

For this inaugural report, we began obtaining baseline data needed to measure and subsequently monitor the impact of our projects and activities. This helped us determine our performance and progress in areas considered material to our company and stakeholders.

We believe that developing our comprehension of where we stand in our Sustainability journey is essential towards identifying potential Sustainability opportunities. This allows us to implement effective programmes, retain and attract talent in our workforce and instill the Sustainability mindset and practices in our corporate culture. All these efforts together contribute towards raising edotco Group’s value and reputation.

While we seek to maintain our compliance to national laws and regulations, we are becoming increasingly aware that more can be done to reduce the harmful impacts of our business activities. In managing and mitigating our footprints, we would like to work more closely with our stakeholders and local policymakers to gain in-depth knowledge on the issues surrounding our business, as well as the wider telecommunications industry.

Through our renewed commitment to Sustainability, we aim to accomplish our vision of “**Building Connectivity for a Sustainable Future**”, while contributing to the sustainable development of our business, people, clients, country, and environment. We invite you to join us in this journey.

### Scope

All of edotco’s business operations and its subsidiaries

### Reporting Period

Covers period of 1 January 2021 to 31 December 2021 (unless otherwise specified)

### Guidance

- Bursa Malaysia Sustainability Reporting Guidelines and Toolkits
- Sustainable Development Goals (SDGs)
- United Nations Global Compact (UNGC)
- Global Reporting Initiatives (GRI) Standards 2016 (2021 as reference)



### Location

Corporate Centre and National Tower Companies (NTCs) across 8 countries, namely Malaysia, Bangladesh, Laos, Philippines, Cambodia, Myanmar, Pakistan and Sri Lanka<sup>1</sup>

### Distribution

Will be made available to our shareholders and key stakeholders including business partners, regulators, industry groups, media, and the community. It will also be available via our website at [edotcogroup.com/sustainability](http://edotcogroup.com/sustainability)

Note: <sup>1</sup> As at December 2021

## Message from Our CEO



**Adlan Tajudin**

*Chief Executive Officer  
edotco Group*



Dear Stakeholders,

2021 was a transformational year for edotco.

The pandemic has created a massive uptick in people working, meeting, and socialising virtually. The challenges during the crisis were formidable. However, it has also demonstrated the critical role that telecommunications infrastructure plays in keeping societies connected and running. As data and voice traffic surge, large site rollouts and network uptime become important to facilitate connectivity and economic resilience. edotco intends to meet the continued needs of the societies for connection.





Despite its unique challenges, edotco has managed to deliver outstanding growth. Record-breaking build-to-suit and co-location tenancies, coupled with aggressive mergers and acquisitions in our key markets bring us closer to our Global Top 5 aspiration while delivering maximum shareholder value. Moving forward, edotco is committed to our Sustainability agenda guided by our Sustainability Framework, via our 4 pillars namely Environment, Social Labour, Social Community and Governance.

As the UN General Assembly passed a non-binding resolution declaring “internet access as human right”, edotco is conscious of its responsibilities in helping the countries where it operates to accelerate digital equality<sup>1</sup>. Internet access is now vital for accessibility to public services, education, health, for improving worker rights, ensure freedom of expression and access to information. In 2021, we supported national digital transformation initiatives such as Malaysia’s JENDELA and Bangladesh’s Smart City, enabling mobile network operators to serve the unconnected and underconnected.

We have also laid the foundation to build Information Society premised on Environmental, Social and Governance (ESG) principles by being the first Malaysian telecommunications infrastructure services company to become a signatory of United Nations Global Compact (UNGC). Our Centre for Design Excellence (CoDE) continuously innovates tower designs using alternative materials, structures and power systems to deliver our green ambitions to foster a low carbon future. Our efforts have garnered global accreditations and accolades, such as becoming one of the three Malaysia-based ‘unicorns’ in Asia.<sup>2</sup>

In our quest to enable greater access to connectivity, we face various obstacles including regulatory challenges, geopolitical matters, increasing costs and heightened competition. These challenges pose an opportunity for unique solutions around next-generation aspirations and we hope to be able to introduce these in line with the expansion of 5G across our footprint.

Moving forward, edotco is committed to our Sustainability agenda, pursuing goals that reflect the deep-seated, long-term purpose of edotco to uplift the local communities we serve.

With this inaugural Sustainability Report, we commit to transparent and balanced communications with you and our stakeholders, and invite you to join us on our journey towards a sustainable future.

Sincerely,

**Mohamed Adlan Ahmad Tajudin**  
Chief Executive Officer  
edotco Group

Sources:

<sup>1</sup> [https://www.article19.org/data/files/Internet\\_Statement\\_Adopted.pdf](https://www.article19.org/data/files/Internet_Statement_Adopted.pdf)

<sup>2</sup> Credit Suisse, ASEAN Unicorns, published 5 October, 2021

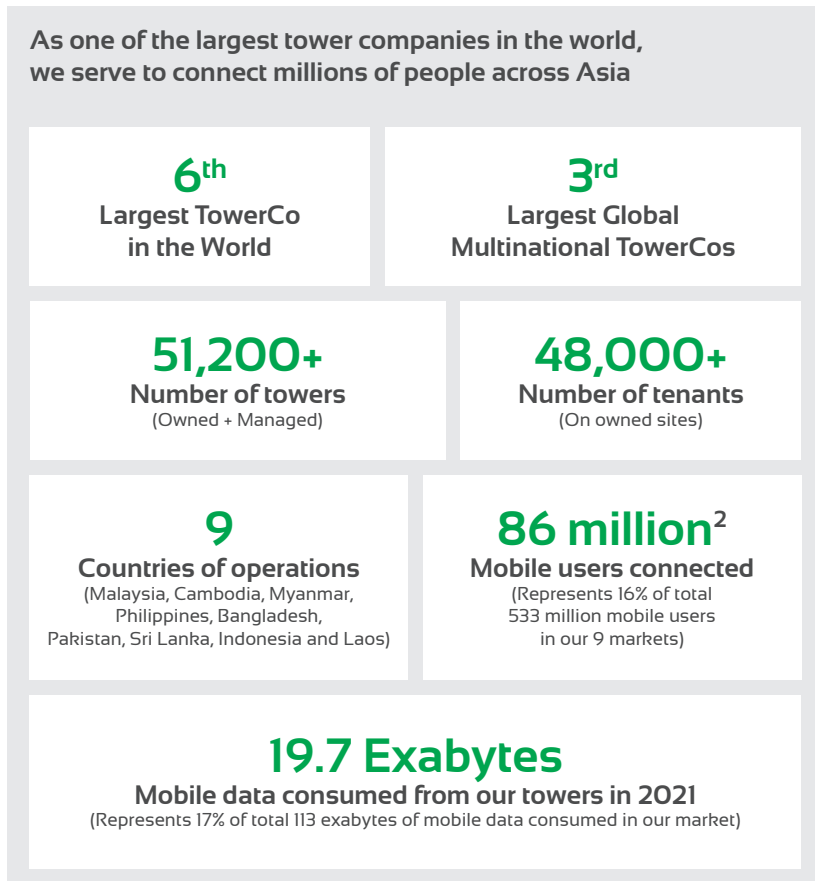
## Who We Are<sup>1</sup>

As the first regional independent integrated telecommunications infrastructure company, edotco Group has been a key player in the development of telecommunications infrastructure in nations across Asia since its inception in 2012.

At edotco Group, we leverage on our position as an industry leader to drive long-term growth. Our role is to make next-generation connectivity universally accessible in order to help nations and societies transform digitally, economically and socially.

Our aim is to provide leading-edge digital infrastructure accessible for all by fulfilling connectivity demands innovatively, proactively and sustainably. We provide end-to-end solutions in the tower services sector from tower leasing, co-locations, build-to-suit, energy, transmission and operations and maintenance (O&M).

We strive to help nations across Asia to advance their communications infrastructure with next-generation solutions and help our customers & partners to accelerate sustainable growth while enabling a positive transformation of the communities.



Notes:

<sup>1</sup> Information as of March 2022

<sup>2</sup> 86 million and 19.7 exabytes is an estimation based on existing tenants

### Purpose

Our nation-building role is to connect the unconnected/under-connected with next-generation connectivity in order to help nations and society transform digitally, economically and socially

### Vision

Building connectivity for a sustainable future

### Mission


We advance communications today for tomorrow

### Values


- **Uncompromising Integrity**  
Honest and fair in all dealings, always keep to promises and a high moral standard
- **Innovating for Tomorrow**  
Agile and hungry for change, manifesting imagination to strive for ambitions
- **Exceptional Excellence**  
Do not accept mediocrity, accountable for the outcome to upkeep only the best performance
- **Ownership Mindset**  
Practice a cost-conscious mindset to create value for the organisation. Always prepare and prevent to avoid repair and repent
- **Sustaining for Life**  
Meeting business needs without compromising future generations. Act in ways that conform to standards of a model Corporate Citizen
- **Emotional Collaboration**  
Respect and embrace diversity, practice a winning mindset as winning the championship is more important than winning medals

# Our Regional Presence<sup>1</sup>


edotco serves 9 emerging Southeast Asian and South Asian markets



**51,200+**  
Tower Portfolio








**28,200+**  
Owned Towers



**23,000+**  
Managed Towers



Year of Entry

2013	2018
 Malaysia	 Laos
 Bangladesh	2019
 Cambodia	 Philippines
2015	2022
 Myanmar	 Indonesia
 Sri Lanka	
 Pakistan	

Note:  
<sup>1</sup> Information as of March 2022

For more details on each country, please refer to Country Highlights on page 84



## Our Board of Directors

edotco's Board of Directors is committed to our Sustainability journey



**Dato Dr. Nik Ramlah Nik Mahmood**  
Independent Non-Executive Director

Chairman, Board of Directors

Chairman, Board Nomination and Remuneration  
Committee



**Abraham Verghese TV Abraham**  
Independent Non-Executive Director

Chairman, Board Audit Committee and  
Related Party Transaction Committee



**Nik Amlizan Mohamed**  
Independent Non-Executive Director  
(Nominee of KWAP)



**Asuka Sato**  
Non-Independent Non-Executive  
Director (Nominee of Investors)

*Note:*  
*As at June 2022*

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## Our Board of Directors



**Mohammad Asri Hassan Sabri**  
Non-Independent Non-Executive  
Director (Nominee of Axiata Group  
Berhad)



**Osamu Itabashi**  
Non-Independent Non-Executive  
Director (Nominee of INCJ, Ltd.)  
  
Member, Board Audit Committee and  
Related Party Transaction Committee



**Kenneth Shen**  
Non-Independent Non-Executive  
Director (Nominee of Khazanah  
Nasional Berhad)  
  
Chairman, Board Risk and Compliance  
Committee



**Norlida Azmi**  
Non-Independent Non-Executive  
Director (Nominee of Axiata Group  
Berhad)

Member, Board Nomination and  
Remuneration Committee



**Mohamed Adlan Ahmad Tajudin**  
Member, Board Risk and Compliance  
Committee

## Senior Leaders at Headquarters and Countries

### Executive Leadership



**Mohamed Adlan Ahmad Tajudin**  
Chief Executive Officer



**Annis Sheikh Mohamed**  
Chief Financial Officer



**Ramon Chelvarajasingam**  
Chief People Officer



**Gayan Koralage**  
Director, Strategy



**Karen Ding**  
Director, Corporate Finance



**Kevin Chong**  
Director, Group Digital  
and Analytics



**Shireen Tan**  
Financial Controller

### Country Leadership



**Abdul Aziz**  
Pakistan



**Gayan Koralage (Acting)**  
Sri Lanka



**Phillip Wong**  
Cambodia and Laos



## Senior Leaders at Headquarters and Countries



**Abdul Yazid Kassim**  
Director, Group Engineering  
& Technology



**Anthony Kersauson**  
Director, Group Mergers and  
Acquisitions



**Azizee Abdul Aziz**  
Director, Group Operations



**Azzahraa Annuar**  
Director, Group Governance, Risk and  
Compliance



**Megat Mohd. Zulkarai Meor  
Zailan**  
Director, Group Commercial  
Management



**Azrin Tajuddin**  
Head, Company Secretarial



**Nizam Abdullah**  
Head, Internal Audit



**Noreen Sabrina Mohd. Noor**  
Head, Group Corporate  
Communications & Branding



**Rajaduray Selvaduray (Acting)**  
Myanmar



**Ricky Steyn**  
Bangladesh



**Suraj Narayanan Kutty (Acting)**  
Philippines



**Wan Zainal Adileen**  
Malaysia

## edotco At a Glance

### What We Do:

edotco provides infrastructure and next-generation solutions to telcos

Established in 2012, edotco Group is the first regional and integrated telecommunications infrastructure services company in Asia, providing end-to-end solutions in the tower services sector from tower leasing, colocations, build-to-suit, energy, transmission and operations and maintenance (O&M).

edotco Group operates and manages a regional portfolio of over 51,200 towers across Malaysia, Indonesia, Bangladesh, Cambodia, Sri Lanka, Pakistan, Philippines, Myanmar and Laos (as at June 2022). edotco strives to deliver outstanding performance in telecommunications infrastructure services and solutions. Its state-of-the-art real-time monitoring service, echo, has driven significant improvements in field operations whilst maximising operational efficiencies in terms of battery, energy and fuel consumption for telecommunications infrastructure.

In 2021, edotco advanced our digital capabilities, including:

- advancement in digital analysis of site-wise visibility and profits,
- network analytics for operator demands,
- build-up of urban land banks and catalogues,
- end-to-end digital operations,
- use of drones and other advanced automotive tools,
- development of a centre of excellence for new designs, and
- the use of alternative materials and units for structures and power systems.

#### What Telcos Operate

##### Active Infrastructure

- a** Antenna
- b** Microwave
- c** Cabin/outdoor cabinet (AC power, DC power & Active Radio equipment)

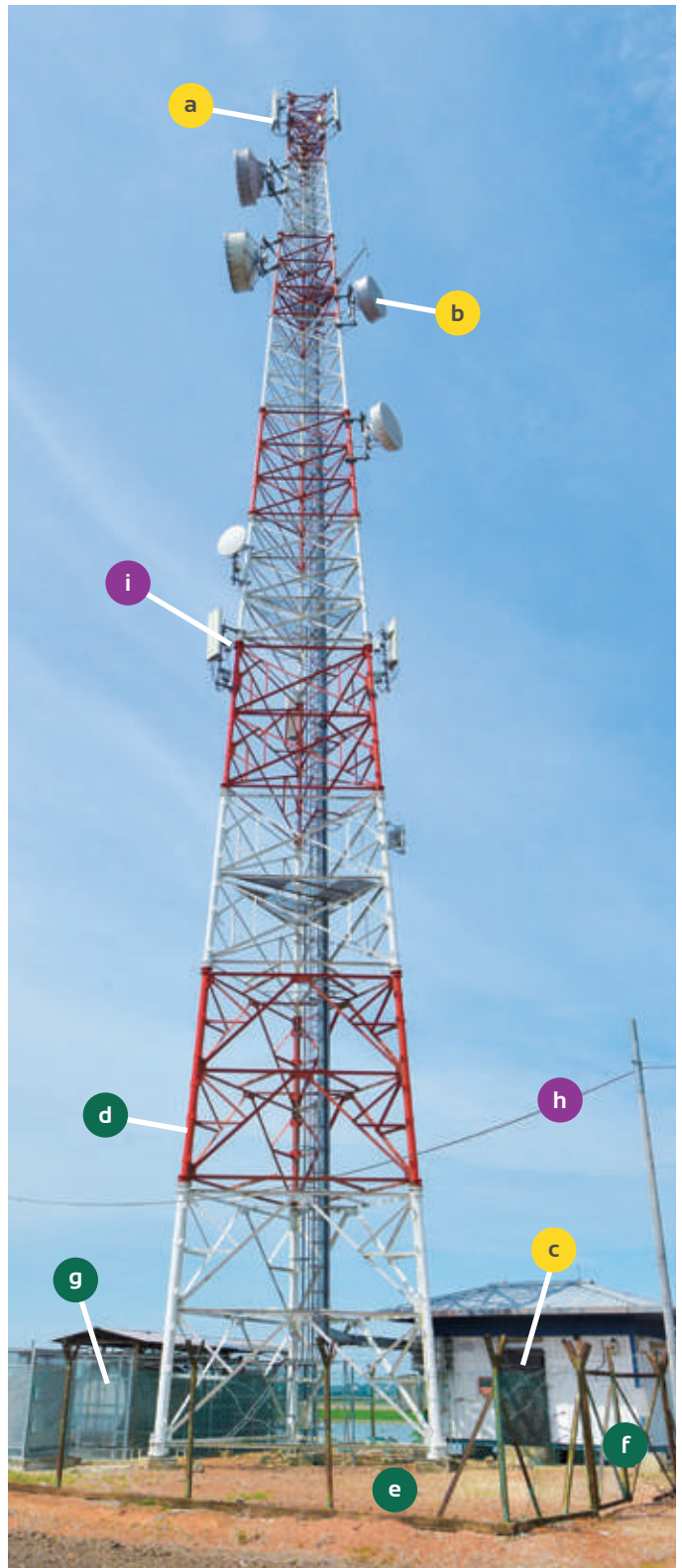
#### What edotco Operates

##### Passive Infrastructure

- d** Tower
- e** Land/Compound
- f** Compound Fencing
- g** Diesel Tank for Back Up Power

##### Next-generation future services

- h** Fibre
- i** Active Infra





## edotco At a Glance

### What's To Come: edotco's strong growth potential in the region

3 areas of growth		
Capture a fair share of tenancies in key home markets via data driven demand simulations, securing land banks ahead of orders.	Move into adjacent Next-Generation revenue opportunities such as managed-sites, power systems, fibre, small cells and edge to provide end-to-end services and also to monetise the locations we already own and operate.	Continue exploring expansion opportunities into other Southeast Asian markets to complete our footprint.

The current operational data for edotco across our footprint is as follows:

								
		MY	BD	MM	KH	PK	SL	PH
Population Coverage	Total Population (Mil)	33	168	55	17	229	22	109
	Cellular Population Coverage (%)	95%	99.6%	95%	99%	99%	98%	99%
Mobile Data Traffic	Pre COVID-19 (2019) Usage/Sub/Month	15GB	2GB	6GB	12GB	3GB	6GB	5GB
	Post COVID-19 (2022F) Usage/Sub/Month	28GB	6GB	7GB	20GB	6GB	14GB	13GB
	Pre vs Post COVID-19	+90%	+226%	+30%	+67%	+145%	+137%	+186%
	GB Per Connection 2026F	48GB	12GB	16GB	35GB	13GB	27GB	38GB
Industry Towers (4G/5G)	2021	29.0 k	39.2 k	25.6 k	10.3 k	38.9 k	9.3 k	27.1 k
	2022 Number of Dark Spots (<5mbps)	-38 k	-23 k	NA	-13 k	-35 k	-15 k	-48 k
	2026F Increment	-9 k	-10 k	-2 k	-3 k	-6 k	-7 k	-38 k
	# of Tier 1/Tier 2 Operators	3/4	3/3	3/4	3/3	3/3	3/3	2/1
	Current TowerCo Penetration	50%	40%	56%	31%	11%	7%	12%
	# of Small Cells Sites 2026F	2.4 k	3 k	1.2 k	0.8 k	2.6 k	0.5 k	NA
5G Rollout	Rollout Year	2021	2023	2024	2023	2022	2022	2020
	Spectrum Allocated	700MHz/ 3.5GHz	2.6/ 3.5GHz	3.5GHz	3.5GHz	3.5GHz	3.5GHz	3.5GHz
	Deployment Model	SA	NSA	TBC	NSA	TBC	TBC	NSA
	Tower Market Share (%)	20%	35%	9%	45%	6%	6%	11%
	Colo Ratio (x)	2.15x	1.48x	2.01x	1.41x	1.28x	1.01x	1.04x

NSA = Non-standalone    SA = Standalone



## edotco At a Glance

In 2021, edotco produced healthy returns despite volatile environments across our footprint

### Financial Review for 2021

In 2021, edotco's total owned and managed towers grew by 33.9% Year on Year (YoY) whilst tenancy counts grew by approximately 16.4%, enabling revenue to expand by 5.2%. Organic and inorganic growth in major markets like Bangladesh and Malaysia fueled this expansion. The year saw Earnings before Interest, Taxes, Depreciation and Amortisation (EBITDA) increasing by 13.1%, benefitting from higher revenue, cost optimisation

and better collection, resulting in lower bad debt provisions compared to FY2020, offset against a one-off retirement benefit in Malaysia and regulatory costs in Bangladesh. Profit after Tax and Minority Interests (PATAMI) surged by 72.9%, contributed by the higher EBITDA and supported by unrealised forex gain, offset against higher tax provisions.



edotco won the Frost & Sullivan's award for  
"Asia Pacific Telecoms Tower Company of the Year"  
in 2021 for the fifth consecutive year

## edotco At a Glance

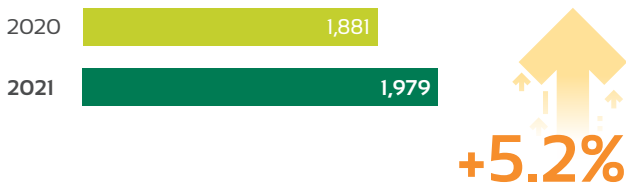
### Operating Environment and Challenges in 2021

In 2021, edotco has experienced a heightened competition following the interest and foray of European and US Private Equity as well as other global Infrastructure players into Asian markets through organic and inorganic means.

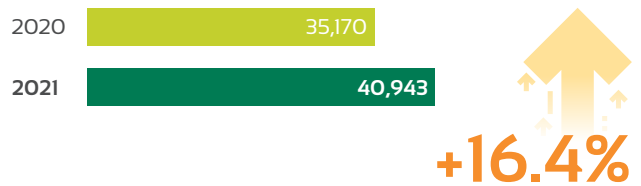
Further, slew of changes in the respective country’s political landscape and governmental, as seen in Malaysia, Myanmar, Cambodia, Philippines and Sri Lanka has prompted us to continue to refine our engagement with targeted stakeholders. For example, in Myanmar, the Posts and Telecommunications Department continues to play an active role in easing operational challenges resulting from the political unrest and international sanctions. Despite the changes, edotco continues to collaborate closely with the relevant authorities to pursue sustainable operating environments.

edotco plays an active role in shaping a forward-looking infrastructure policy to future-proof its business. Positioning itself as a key consultation partner to the Government, edotco has played an active role in advocating policy and regulatory reforms in Malaysia, Philippines, Pakistan and Bangladesh on diverse issues including but not limited to 5G, competition and market structure, permitting, licensing and rural communications and connectivity.

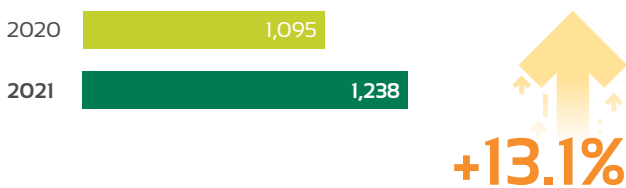
#### Revenue (RM million)



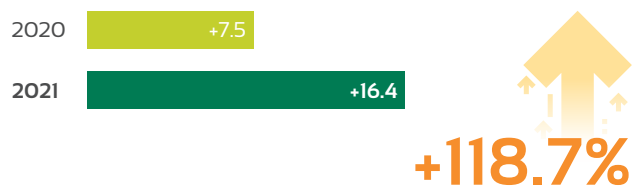
#### Tenancies (RM million)



#### EBITDA (RM million)



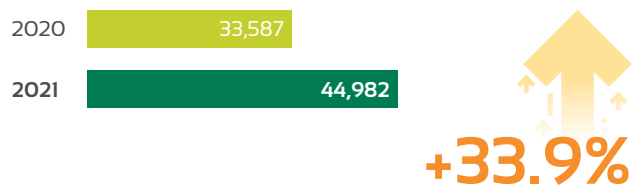
#### Tenancy Growth (%)



#### PATAMI (RM million)



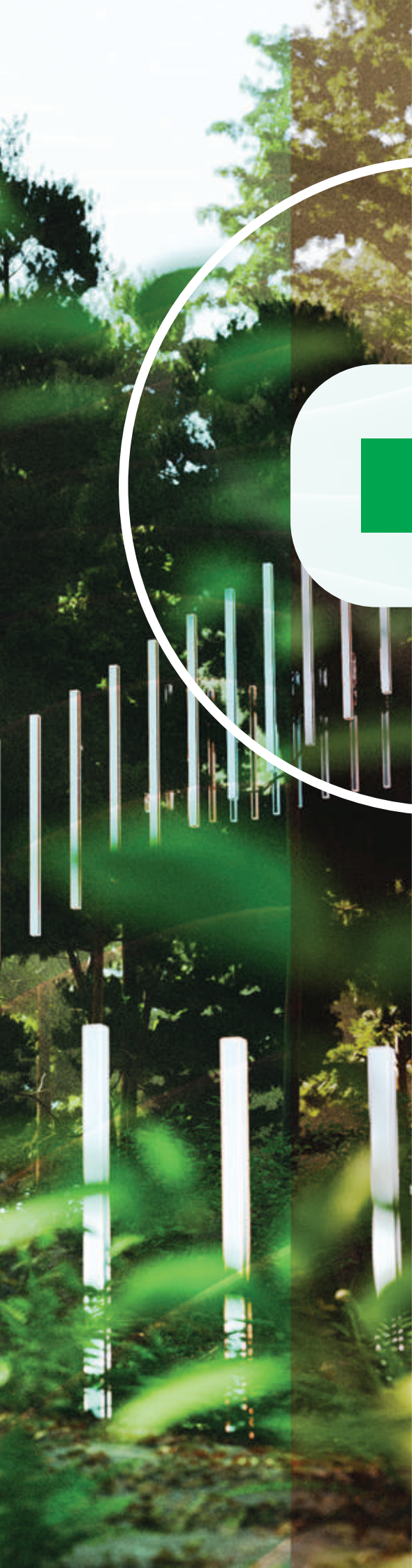
#### Tower Growth (%)











# Our Commitment to Sustainability

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## Commitment to Sustainability

At edotco, we appreciate global and national efforts to champion and realise sustainable development. As a responsible leader in the tower infrastructure services sector in the region, we recognise the need to contribute to global efforts to achieve sustainable growth.








At the core of our Sustainability strategy, we made a concerted effort to integrate the United Nation Sustainability Development Goals (UN SDGs) into our business decisions.

In 2021, a series of efforts have been undertaken to further strengthen our commitment to Sustainability as outlined below:

- 1) edotco is the first in our sector to become the signatory of UN Global Compact in Malaysia and adopt the IO principles to mobilise actions of sustainable development in our organisation - focusing on Human Rights, Labour, Environment and Anti-Corruption.
- 2) A Governance Structure was set up to manage our strategic and operational efforts.
- 3) A Framework was approved by our Board to ensure a coordinated approach towards Sustainability across our footprint.
- 4) A materiality assessment and gap analysis were performed to identify our focus areas.

In addition, we strive to align our focus to global standards in reporting our efforts in this inaugural report. The global standards referenced include the Sustainable Development Goals (SDGs), the Global Reporting Initiative (GRI) and United Nations Global Compact (UNGC), ensuring that information is published in a structured and transparent manner.

### edotco’s Board approved Sustainability Framework

	Environmental	Social	Governance
		 Labour  Community	
	SDG 7 - Affordable and Clean Energy SDG 9 - Industry, Innovation and Infrastructure SDG 12 - Responsible Consumption and Production SDG 13 - Climate Action	SDG 3 - Good Health and Well Being SDG 5 - Gender Equality SDG 6 - Clean Water and Sanitation SDG 8 - Decent Work and Economic Growth SDG 10 - Reduced Inequalities SDG 11 - Sustainable Cities and Communities	SDG 17 - Partnerships for the Goals
	ENVIRONMENT - Principle 7 ENVIRONMENT - Principle 8 ENVIRONMENT - Principle 9	HUMAN RIGHTS - Principle 1 HUMAN RIGHTS - Principle 2 LABOUR - Principle 3 LABOUR - Principle 4 LABOUR - Principle 5 LABOUR - Principle 6	ANTI CORRUPTION - Principle 10
	Energy Emissions Waste Environmental Compliance	Organisational Profile Economic Performance Market Presence Employment Labour/Management Relations Occupational Health & Safety Training & Education Diversity & Equal Opportunity Non-Discrimination Local Communities Customer Health & Safety	Organisational Profile Strategy Governance Stakeholder Engagement Reporting Practice Anti-Corruption Anti-Competitive Behaviour Procurement Practices Customer Privacy Socioeconomic Compliance Customer Health & Safety

## Approach to Sustainability

### edotco’s aspirations will be guided by continued focus on our ESG pillars to ensure sustainable growth

edotco has progressed on the journey to become The Next-Generation TowerCo by complementing our traditional TowerCo products with value-added and innovative offerings. We recorded our strongest growth in terms of Built-To-Suit (B2S) and co-locations in most of our markets.

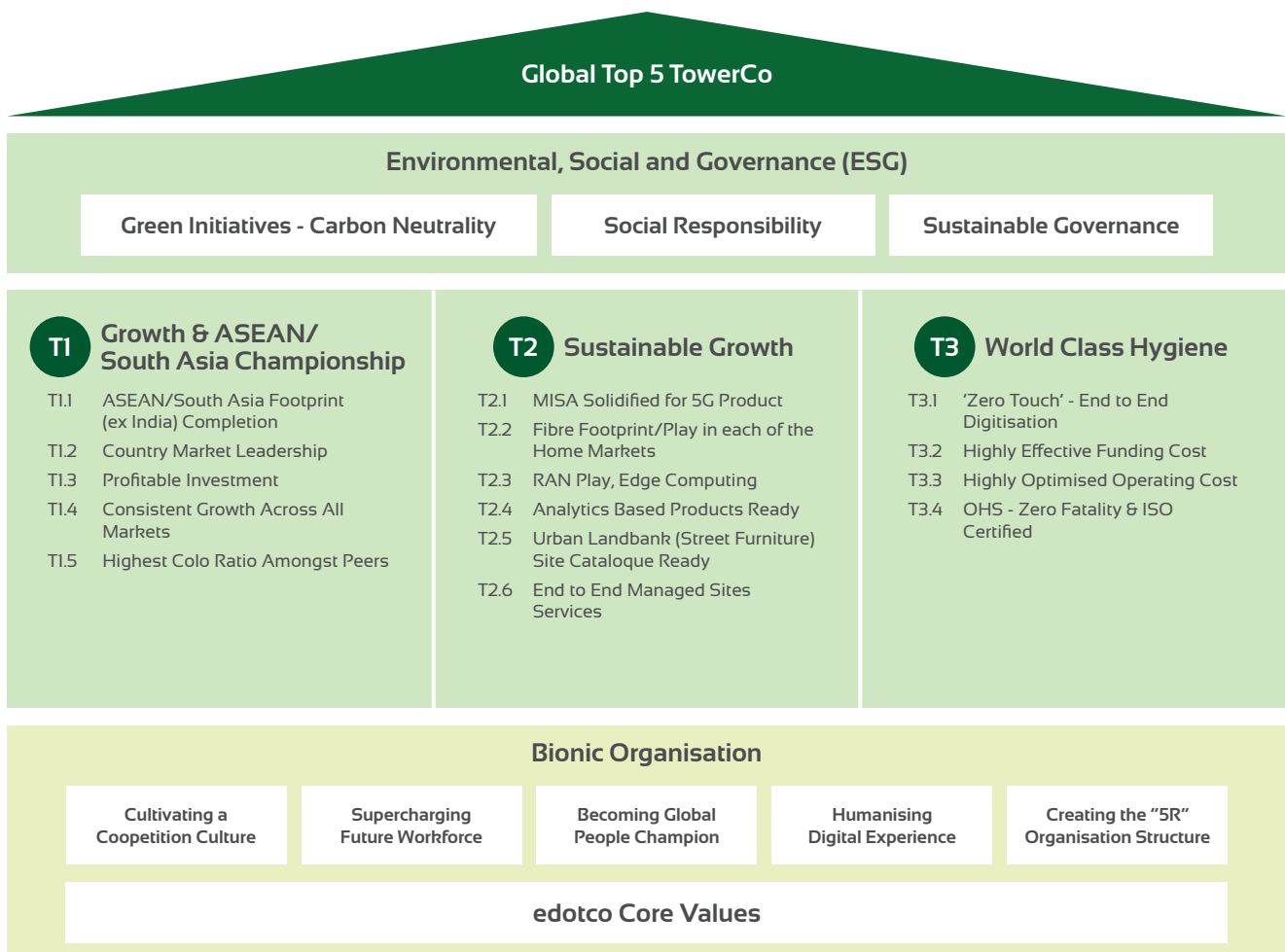
As at the end of 2021, edotco became the sixth largest TowerCo in the world based on the number of owned and managed sites in its portfolio, a step closer to our ambition of becoming a Global Top 5 TowerCo by 2024.

Given our resilient business model and strong balance sheet, enough headroom exists to fund our ongoing organic and inorganic expansion plans through a combination of borrowings and internal funds. However, business risks relating to sanctions are a concern and consistently being evaluated to ensure compliance to relevant sanctions regulation.

edotco’s ambitions in the market are strategically summarised in the framework below:

- » captures our aspiration to be a Global Top 5 TowerCo,
- » emphasises the importance of ESG in achieving this aspiration,
- » illustrates the focus of the business, and
- » highlights the importance of our people and core values in the journey ahead.

### edotco’s Strategic Framework





## Approach to Sustainability

### edotco's Sustainability Journey

Innovation and Sustainability are well embedded into our business. We seek to ensure that, as we continue to grow from strength to strength, we take intentional and conscientious decisions to reduce our environmental impact on the planet, improve the quality of life of the communities we serve and run our company with the highest level of integrity.

We will continue to focus on rolling out sites in a timely and cost effective manner, as well as to promote sharing that will help the telecommunication providers bring down their cost.

- » Expanding our footprint aggressively by constructing new towers and colocations, as well as continuing to monetise existing assets
- » Delivering scale and profitability through portfolio rebalancing whilst continuing to practice cost optimisation and taking it to the next level
- » Introducing 5G-ready offerings to solidify our position as the preferred 5G network rollout partner through:
  - Commercialising management and power services for 5G related products,
  - Deepening of adjacent products such as bandwidth services, inbuilding Distributed Antenna Systems (DAS) and small cells, and
  - Validating Network as a Service (NaaS) for rural telephony use cases.
- » Enriching our product portfolio by introducing Tower Plus solutions
- » Introducing zero-touch operations through digitalisation to streamline and automate key processes
- » Leveraging on analytics to drive Sales, Operations, Customer Experience and cost saving initiatives
- » Strengthening ESG compliance through a solid ESG framework and adopting strategic best practices in Sustainability
- » Solidifying network rollout efforts via partnerships with technology players, municipal councils and state agencies to solve "under-connected" issues
- » Advancing regional thought leadership initiatives to encourage in-country harmonisation of international best practices in licensing and infrastructure roll-out across in-country policies and regulatory frameworks
- » Creating a Bionic organisation and establishing a championship culture as part of our distinctive corporate culture





Sustainability will be a major focus for edotco moving forward as we look to embed ESG considerations deeply within our operations. This report represents the first of many to ensure consistent communication of our progress towards our two Sustainability commitments:

- » **To be carbon neutral across all our NTCs by 2030**
- » **Balanced and holistic implementation of all Sustainability pillars**

### Our Sustainability Strategy

edotco's Sustainability strategy is founded on the four scopes of Sustainability that are aligned to our ESG pillars. These pillars define our focus areas that align our ambition for sustainable growth with our goals for business success, in the short, medium and long term. This will be further developed into a roadmap and an action plan with supporting monitoring and evaluation elements.

#### edotco's Sustainability Pillars

<p style="text-align: center;"><b>Environmental</b></p> <p style="text-align: center;">edotco's focus areas in managing environmental impact and towards decarbonisation</p> <div style="text-align: center;">  </div>	<p style="text-align: center;"><b>Social</b></p> <p style="text-align: center;">edotco's focus areas in creating meaningful relationships in the company and with our stakeholders</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>Labour</p> </div> <div style="text-align: center;">  <p>Community</p> </div> </div>	<p style="text-align: center;"><b>Governance</b></p> <p style="text-align: center;">edotco's focus areas in upholding diligent standards and best practices to protect the interests of our stakeholders</p> <div style="text-align: center;">  </div>
<ul style="list-style-type: none"> <li>Climate Change</li> <li>Renewables</li> <li>Alternative Materials</li> <li>Waste Management</li> <li>Reforestation</li> <li>Employee's Green Scorecard</li> <li>edotco E-Business Card</li> </ul>	<ul style="list-style-type: none"> <li>Diversity, Equity and Inclusion (DEI)</li> <li>Training and Education</li> <li>Gender Representation at All Levels</li> <li>Minimum Wage and Age</li> </ul>	<ul style="list-style-type: none"> <li>Tower2Community</li> <li>Tower2Water</li> <li>Tower2Power</li> <li>Wakalah Zakat</li> </ul>
		<ul style="list-style-type: none"> <li>Anti-Corruption</li> <li>Health and Safety</li> <li>Board Composition</li> <li>Risk Management</li> </ul>

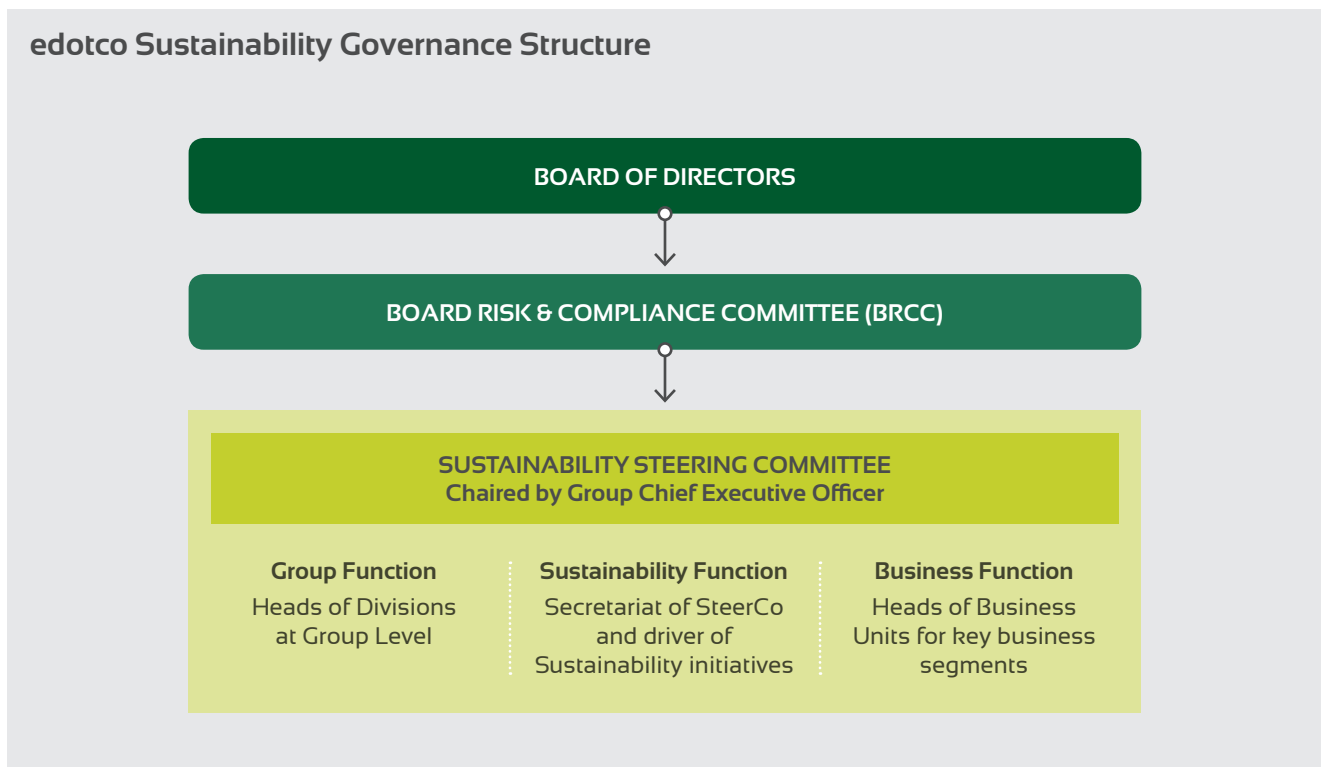
## Sustainability Governance

We have developed a governance structure dedicated to Sustainability, one that complements our existing organisational structure and underscores the importance of embedding Sustainability into the organisation’s overall management and operations. A high-level overview of the structure is presented here, with more details in the subsequent section.

The Board of Directors (BOD) is the highest governance body and endorses the Group’s Sustainability strategic direction. The Board Risk & Compliance Committee (BRCC) provides oversight on the development of the Group Sustainability Strategy, related policies and risk mitigation plans.

Sustainability ESG Steering Committee (SteerCo) was established with the approval of BOD to translate the Sustainability strategies into effective implementation of initiatives through the Group. The SteerCo’s objective is to provide advice and assistance to the Board for sound decision-making on Sustainability issues as well as facilitate the overall goal towards improving and enhancing the Group’s sustainability performance.

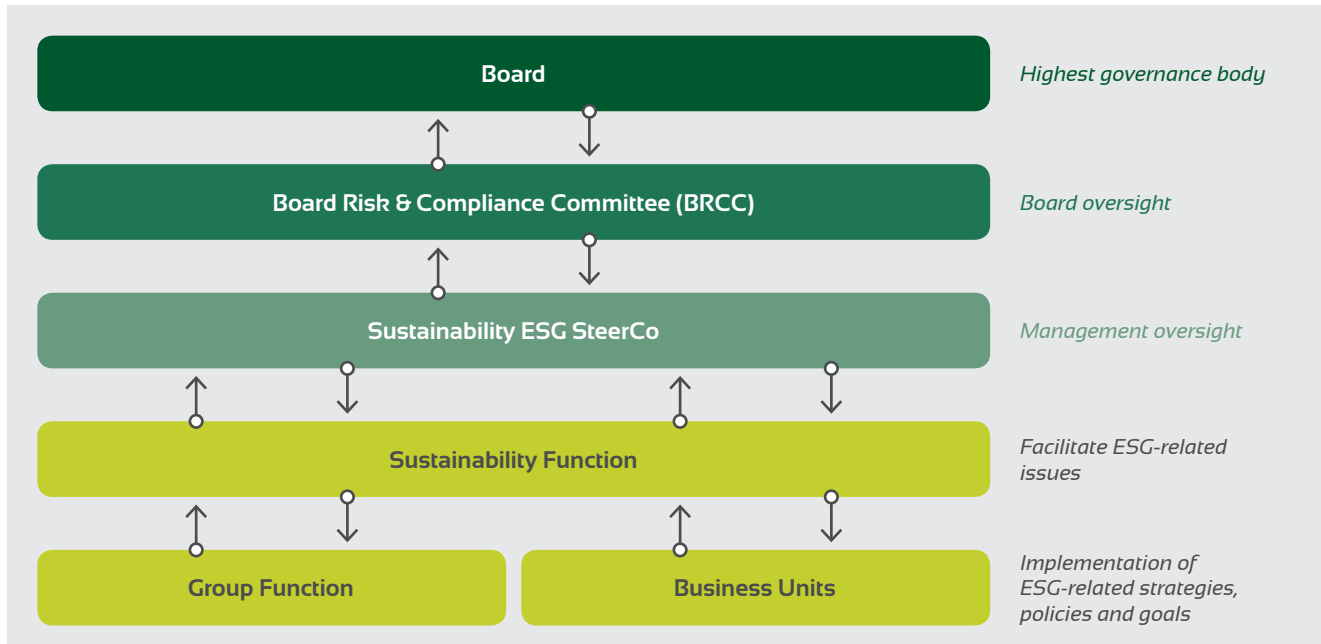
The Director of Governance, Risk and Compliance has been tasked to provide a dedicated focus to manage Sustainability strategically, including the integration of Sustainability considerations in the operations of the Group.



## Sustainability Governance

### Governance Structure

The Sustainability governance structure at edotco has been designed and approved by the Board to enable accountable yet distributed responsibilities for the commitments and initiatives identified.



#### Board

The highest level of Sustainability accountability resides with the Board. The CEO of Axiata is the designated Board Member in edotco’s Board to head the Sustainability efforts across the organisation. edotco is also a part of the Axiata Group Sustainability Steering Committee to ensure alignment and collaboration with Axiata Group related initiatives.

Responsibilities include

- Oversee Sustainability activities executed by the Management
- Approve Sustainability-related policies
- Approve Sustainability framework and structure

#### Board Risk and Compliance Committee (BRCC)

BRCC has oversight over our Sustainability commitments, including tracking and reporting. BRCC is currently made up of the following positions from the organisation:

- Chairman of BRCC
- Group Chief Risk and Compliance Officer, Axiata Group Berhad
- CEO of edotco
- Representatives from our majority investors
- Director of Governance, Risk and Compliance (GRC) in edotco

Responsibilities include

- Assist the Board in overseeing the development of edotco’s Sustainability strategy and monitoring its performance in relation to Sustainability matters
- Review the effectiveness of risk management and internal control policies relevant to both Sustainability and other matters
- Ensure that the Sustainability SteerCo is functioning effectively
- Review and endorse Sustainability-related policies, framework and structure for Board approval
- Oversee and support stakeholder engagement on Sustainability matters



## Sustainability Governance

### Sustainability Steering Committee

The Sustainability Steering Committee (SteerCo) holds the operational responsibility of ensuring organisational progress within the Sustainability initiatives in achieving identified goals.

Sustainability SteerCo is made up of the following positions from the organisation:

- Chief Executive Officer
- Chief Financial Officer
- Chief People Officer
- Director of Strategy
- Director of Engineering
- Director of Corporate Finance
- Director of Governance, Risk and Compliance
- Country Managing Director (all National Tower Companies (NTC))

Responsibilities include

- Review and approve Sustainability Report
- Approve the execution plans of the Sustainability Framework once approved by the Board
- Meet on a quarterly basis to ensure sustainability initiatives are on track
- Oversee and monitor edotco’s progress against its carbon neutral and net zero target

### Sustainability Function

The Sustainability Function forms the Sustainability working group and is responsible for the day-to-day supervision of Sustainability initiatives together with the responsible parties. This function is part of edotco’s Governance, Risk & Compliance Department.

Sustainability Function is made up of the following positions from the organisation:

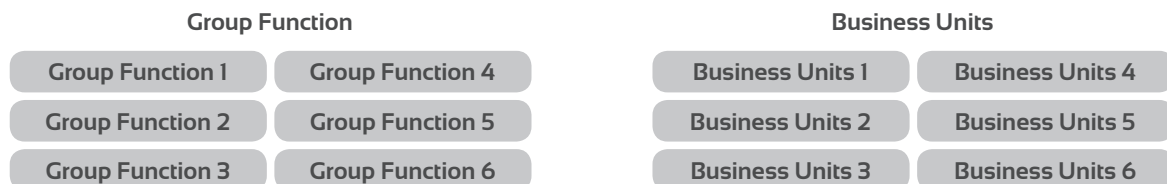
- Director of Governance, Risk and Compliance
- Advisor, Governance Unit
- Specialist, Sustainability & CSR

Responsibilities include

- Prepare the Sustainability Report
- Submit an annual Communication on Progress (CoP) to the UNGC
- Act as the Secretariat for the Steering Committee
- Provide bi-annual updates on Sustainability matters to the Board
- Coordinate the execution of Sustainability related initiatives by Group
- Liaise between Axiata, NTC, or other stakeholders on Sustainability-related matters
- Execute Sustainability initiatives matters
- Purview includes conceptual adoption of Sustainability, communications, risk identification and mitigation, business process improvements, data tracking and balanced reporting to stakeholders

### Group Functions and Business Units

The Group Functions and Business Units represent the originator, owner and implementor of identified Sustainability initiatives. The relevant Business Units at NTC (e.g. NTC Human Resource, NTC Engineering, NTC Risk & Compliance) reports to Group Functions (e.g. Group Human Resource, Group Engineering and Group GRC) to ensure consistency and efficiency in the execution of edotco’s Sustainability Framework. Starting 2022, all Country Managing Directors at our NTC carry Sustainability KPI cascaded from Group to ensure strong adoption of sustainability across edotco’s footprints’. The representation is as portrayed below:



Responsibilities include

- Identify possible Sustainability initiatives, innovation opportunities and business process improvements in order to support Sustainability goals
- Manage day-to-day operations of these efforts in relevant pillars
- Prepare and submit Sustainability data for Sustainability Steering Committee approval on a quarterly basis and/or as requested

# Sustainability Highlights and Challenges

2021 was a year of transformation for edotco's Sustainability journey



## Highlights

Environmental	Social (Labour)	Social (Community)	Governance
<p>We initiated a number of projects to kick start our efforts in managing our environmental impact, including:</p> <ul style="list-style-type: none"> <li>• Undertook a <b>holistic approach</b> to building green infrastructure, innovating designs, improving energy efficiency and investing in <b>renewable technologies</b></li> <li>• Implemented <b>sustainable waste management</b>, collecting and recycling 908.8 tonnes of e-waste and 545.1 kg of recyclable items in 2021</li> <li>• Implemented <b>Green Office initiatives across 85%</b> of our National Tower Companies (NTCs)</li> <li>• Continued our <b>Tree Planting Programme</b> across our footprint, successfully planting more than 38,000 trees by the end of 2021</li> </ul>	<p>We are currently focused on two main impact areas - a commitment to our workforce to ensure that we remain dedicated to the well-being of our people, and a commitment to our communities by uplifting their quality of life through access to basic necessities. The highlights of these efforts include:</p> <ul style="list-style-type: none"> <li>• Bionic organisation as central approach to manage our people from training and developments to ensuring min age and wage are met across our footprint</li> <li>• Elevated our <b>Diversity, Equity and Inclusion commitment</b> with a range of initiatives and in becoming a member of the 30% Club Malaysia which promotes greater female representation at senior leadership and Board levels. Our CEO, CPO and GRC Director are members of the 30% Club Malaysia</li> <li>• Enhanced <b>occupational health and safety management</b> by obtaining the ISO 45001 Certification in Malaysia, Myanmar, Bangladesh and Pakistan</li> </ul>	<ul style="list-style-type: none"> <li>• Benefitted <b>more than 11,000 families</b> through our Tower2Community programme which provides electricity from renewable energy sites, clean water and humanitarian relief</li> <li>• Provided <b>humanitarian aid to more than 5,000 people</b> according to each community's needs</li> </ul>	<p>We are working to institute a strong and standardised governance structure across our group and NTCs, and are committing to efforts which include:</p> <ul style="list-style-type: none"> <li>• First Malaysian telecommunications infrastructure services company to become a signatory of the UNGC in August 2021, demonstrating our commitment to the 10 Principles on Human Rights, Labour, Environment and Anti-Corruption</li> <li>• Developed and executed our Board-approved <b>Integrity and Anti-Corruption Plan (IACP)</b></li> <li>• Conducted mandatory e-learning and training programmes company-wide with <b>100% completion rate on Uncompromising Integrity, Exceptional Performance (UI.EP) values, Risk Compliance and Governance-related issues</b></li> </ul>
<p>Some of the challenges faced include:</p> <ul style="list-style-type: none"> <li>• limitations of the current supply chain to be able to provide for greener material,</li> <li>• limitations of local service providers to support initiatives,</li> <li>• limitations of resources to aggressively roll out programmes across the region, and</li> <li>• the unavailability of Carbon Certification programmes to strengthen our green agenda in the countries we operate.</li> </ul> <p>We will continue to work with our suppliers and partners to collaboratively progress the adoption of green practices.</p>	<p>Our Diversity, Equity and Inclusion (DEI) agenda is still a work in progress. We will work to ensure that we achieve our desired bionic workforce.</p>	<p>The success of our efforts is highly dependent on local partners and communities. The challenge faced at some sites is in securing the cooperation of the key partners and community members in the implementation of the programmes. Our teams will continue to engage stakeholders on the ground to further understand and collaborate on programmes.</p>	<p>The main challenge faced is the evolving regulatory and compliance landscape across the countries we operate in. We will continue to work closely with the relevant local authorities to ensure that the highest levels of integrity and compliance are upheld.</p>



## Challenges

## Sustainability Highlights and Challenges

### Business Review for 2021:

### Strong focus on growth and innovation throughout the pandemic

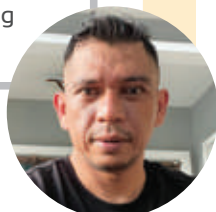
Lockdowns and restrictions across edotco's footprint during the pandemic caused widespread disruptions and concerns. Basic daily needs, education and the economy were affected, increasing the urgency and importance of internet access. This fueled our determination to bring digital access to those who need it the most.

Some of edotco's business highlights:

- » Secured edotco's first 5G active Distributed Antenna Systems (DAS) from Digital Nasional Berhad (DNB) Malaysia with approximately 250 5G sites to rollout in the first phase of 5G deployment in 2021
- » Delivered highest Built-To-Suit (B2S) at approximately 2,800 and 300 sites in Bangladesh and Pakistan respectively
- » Solidified leadership in Malaysia via the acquisition of Touch Mindscape and D'Harmoni which strategically added approximately 1,000 new tenanted towers and 250 sites respectively to our portfolio
- » Rapidly deployed at hotspot locations such as quarantine centres, hospitals and residential areas throughout our footprint, and
- » Intensify cost optimisation initiatives, analytics-based co-locations and optimised loading

Our NaPA tool, it's a proprietary developed entirely by our inhouse Data Scientist and RF planning expert, uses powerful geocoding and analytics to generate coordinates with granularity and accuracy, thereby helping identify areas lacking connectivity in the markets and promoting tower sharing towards bridging the digital divide.

**Azwira Harun**  
Head of Network Performance  
& Insight (echo), edotco Group



Innovation was a key focus for edotco during this period, with some highlights below:

- » The value chain was diversified by pursuing next-generation infrastructure solutions towards becoming The Next-Generation TowerCo
- » The roll out of advanced industry solutions was accelerated with research and development by edotco's Centre of Design Excellence (CoDE):
  - Introduced low-cost solution designs for Malaysia, Myanmar, Pakistan and Cambodia, resulting between 12% and 20% in cost optimisation
  - Designed more than 1,600 site foundations in-house resulting in better budget management and quality assurance
  - Strengthened 28 sites in Cambodia to resolve loading issue and released 77 sites for colocation
  - Designed and deployed first Spun Pre-stressed Concrete
  - Provided approximately 18,000 designs, drawings, Technical Site Survey Reports and Bill of Quantities related support to all of edotco's National Tower Companies (NTCs)
- » The Network and Planning Analytics (NaPA) solution is edotco's pioneering solution, providing insights into potential locations for new tower sites and reduce build and delivery time. The NaPA solution uses powerful geocoding and analytics to generate coordinates with granularity and accuracy, thereby helping identify areas lacking connectivity in the markets and bridging the digital divide. The outcome of NaPA is also providing a network colocation potential for all MNO and encourage in-tower sharing within MNO in line with edotco's Sustainability programme supporting our transition towards a low carbon economy



Scan here to know more about NaPA

- » Creating Digital Twin for key towers which enables virtual site verification by customers, accurate and timely asset audit and comprehensive structure analysis for preventive measure



Scan here to know more



## Recognition of Our Efforts

We are encouraged by the recognitions received for our sustainability journey

Sustainable Business Awards Malaysia 2021: Energy Management Category - Significant Achievements





UN Global Compact Network Malaysia & Brunei (UNGCMYB) Sustainability Performance Award 2021 for SDG Ambition Benchmark 8 - 100% resource recovery, with all materials and products recovered and recycled or reused at end of user

Company of the Year for Excellence in Environmental and Community Welfare Initiative at the Sustainability & CSR Malaysia Awards 2021



Asia Pacific Telecoms Tower Company of the Year Award by Frost & Sullivan

## Recognition of Our Efforts


### Employee Excellence Awards (EXA) by Human Resources Online in Singapore 2021

- **Gold**, Best Soft Skill Training
- **Silver**, Most Inspiring Leadership
- **Silver**, Best HR Digital Transformation
- **Bronze**, Best Succession Planning Strategy

### HRD Asia Awards 2021

- Winner for HR Team of the Year (Asia)
- Winner for Best Rewards and Recognition (Asia)
- Excellence Awards for HR Rising Star (Asia)
- Excellence Awards for Employer of Choice (Asia)
- Excellence Awards for Best Use of HR Technology (Asia)
- **Silver** for HR Leader of the Year
- **Gold**, for Most People Focused CEO
- **Silver**, for Excellence in Business Transformation
- **Silver**, for Excellence in HR Digital Transformation
- **Bronze**, for Excellence in HR Team Collaboration


### Winner for Workforce and Significant Achievements by Sustainable Business Awards Malaysia 2021

### Kincentric Best Employer 2021




### UNGC Signatory, the first Malaysian telecommunications infrastructure company to be a signatory

### Occupational Health and Safety ISO certification for Pakistan



### ASEAN Risk Professional Award Winner for 2021



### ASEAN Company GRC Award Runner-Up for 2021 (edotco)









# Towards Sustainable and Responsible Growth

Integrated Stakeholder Engagement

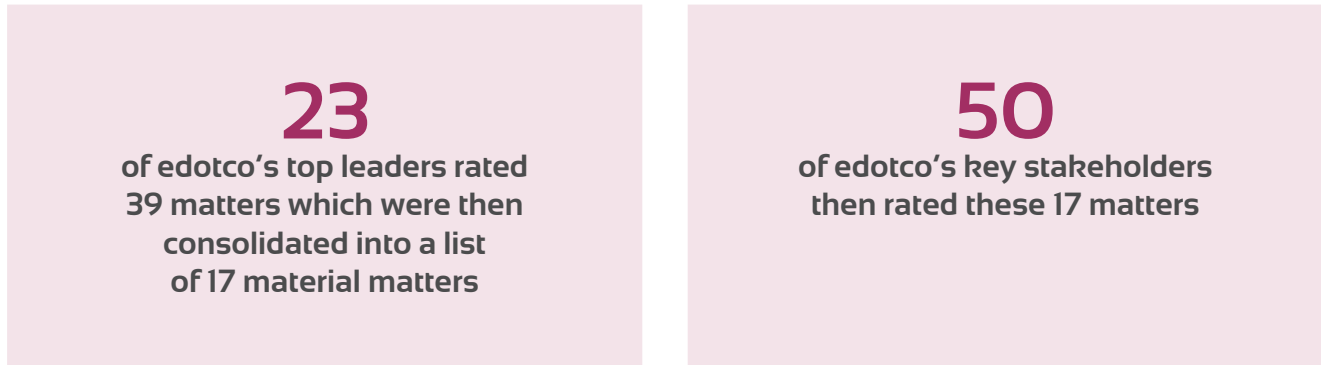
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Corporate Governance

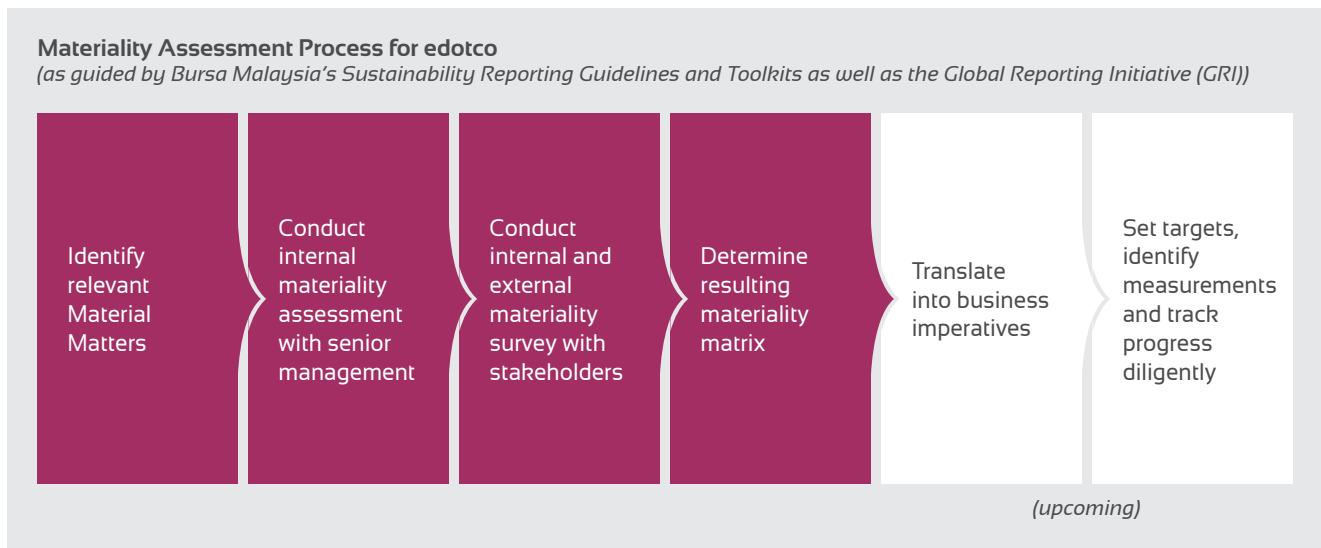
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## Integrated Stakeholder Engagement

Determining the materiality of Sustainability matters for edotco is one of the most critical initiatives that we can undertake to guide the direction of our ESG focus in the coming years. We sought to understand the priorities of our internal and external stakeholders with the resulting materiality matrix.



This has enabled us to gain a deeper understanding of matters that are material to the business. Moving forward, we will ensure that the matrix is kept up to date and relevant alongside business as well as market developments.



**Way Forward**

- Periodically reassess our Materiality Matrix to ensure relevance
- Translate the Materiality Matrix into business priorities and imperatives
- Establish baseline levels and determine targets for the Material Matters
- Identify quantitative and qualitative measurements for progress tracking of our Material Matters
- Map Sustainability initiatives to the Material Matters to ensure action is taken in every high-rating material matter

## Integrated Stakeholder Engagement

edotco’s Materiality Matrix identifies the most important material matters as ranked by internal and external stakeholders.

The 17 Material Matters that emerged as the highest ranked matters are as portrayed below. The results of the materiality assessment identified the digital components of Governance (Information and Cybersecurity) and Social (Customer and Data Privacy) as high priorities in the organisation. Similarly, ranking high in the material matters were corporate concerns related to the organisation’s Corporate Governance and Management and Corporate Behaviour and Culture. Closely behind is recognition of the importance of Energy Management and Carbon Emissions, along with Employee Well-Being.

With this prioritisation, edotco will expand the high-ranking material matters in coming years to identify supporting initiatives, measurements and targets.



● Environment ● Social ● Governance

### Material Matters Considered:

- |                                       |  |   |
|---------------------------------------|--|---|
| <b>E1</b> Carbon Emissions            | <b>S1</b> Fair and Equal Employment Opportunity and Conditions | <b>G1</b> Business Performance and Activities |
| <b>E2</b> Environmental Opportunities | <b>S2</b> Employee Well-being                                  | <b>G2</b> Corporate Behaviour and Culture     |
| <b>E3</b> Energy Management           | <b>S3</b> Connectivity and Access                              | <b>G3</b> Corporate Governance and Management |
| <b>E4</b> Environmental Management    | <b>S4</b> Ethics and Human Rights                              | <b>G4</b> Information and Cybersecurity       |
|                                       | <b>S5</b> Community Impact                                     |   |
|                                       | <b>S6</b> Public Policy  |   |
|                                       | <b>S7</b> Customer and Data Privacy                            |   |
|                                       | <b>S8</b> Client Satisfaction and Brand Image                  |   |
|                                       | <b>S9</b> Disaster Relief                                      |   |



## Integrated Stakeholder Engagement

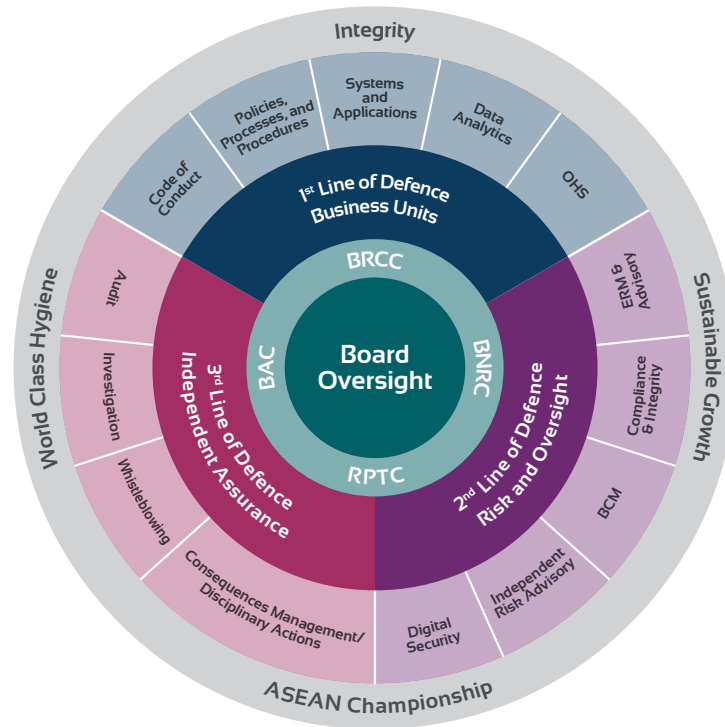
edotco's priorities, direction and decisions are guided by our stakeholders. As we strive to achieve our goal of creating sustainable and equitable access for all, our stakeholder engagements provide us with inputs and ideas we need to achieve inclusive growth. We value these relationships and will continue to closely consult with our stakeholders.

Stakeholder Groups	Frequency of Engagement	Channel/ Mode of Engagement	Discussion Topics
Government and Regulator	Ad-Hoc	<ul style="list-style-type: none"> <li>Bilateral and multilateral meetings</li> <li>Webinar, industry workshop and dialogues</li> <li>Written responses to public consultation papers</li> <li>Co-engagement with International Organisations</li> </ul>	<ul style="list-style-type: none"> <li>Policy and legislative reforms</li> <li>Next-Generation TowerCo and future-proofing of infrastructure business</li> <li>Licensing application and reforms to enable active infrastructure sharing</li> <li>Competition and market structure</li> <li>Permitting</li> </ul>
	Quarterly	<ul style="list-style-type: none"> <li>Financial reporting</li> <li>Operational reporting</li> </ul>	
	Annually	<ul style="list-style-type: none"> <li>Annual Reports</li> <li>Site audits and visits</li> </ul>	
Shareholder and Investor	Ad-Hoc	<ul style="list-style-type: none"> <li>Extraordinary General Meetings</li> <li>Investor briefings</li> <li>Corporate website</li> <li>Bursa announcements</li> <li>Social media engagements</li> </ul>	<ul style="list-style-type: none"> <li>Updates on financial performance</li> <li>Growth strategy and business plans</li> <li>Sustainability adoption plans</li> </ul>
	Quarterly	<ul style="list-style-type: none"> <li>Financial Results</li> </ul>	
	Annually	<ul style="list-style-type: none"> <li>Annual General Meetings</li> <li>Annual Reports</li> </ul>	
Analyst	Quarterly	<ul style="list-style-type: none"> <li>Analyst Briefings</li> </ul>	<ul style="list-style-type: none"> <li>Financial and business performance</li> </ul>
Customer	Ongoing	<ul style="list-style-type: none"> <li>Customer meetings</li> </ul>	<ul style="list-style-type: none"> <li>Service and product quality</li> <li>Implementation of regulatory and compliance matters</li> </ul>
	Annually	<ul style="list-style-type: none"> <li>Customer Satisfaction Surveys</li> </ul>	
Supplier	Ad Hoc	<ul style="list-style-type: none"> <li>Tender evaluations</li> </ul>	<ul style="list-style-type: none"> <li>Competitive pricing</li> <li>Integrity due diligence</li> <li>edotco's Green framework</li> </ul>
	Ongoing	<ul style="list-style-type: none"> <li>Supplier meetings</li> <li>Supplier Qualification Screenings</li> </ul>	
	Annually	<ul style="list-style-type: none"> <li>Supplier performance review</li> </ul>	
Non-Profit Organisation	Ongoing	<ul style="list-style-type: none"> <li>Collaborative initiatives</li> </ul>	<ul style="list-style-type: none"> <li>Collaboration plans and execution</li> <li>Potential recurring collaboration</li> </ul>
Community	Ongoing	<ul style="list-style-type: none"> <li>Philanthropic activities</li> <li>Community Investments</li> <li>Community based projects and programmes</li> </ul>	<ul style="list-style-type: none"> <li>Philanthropy outreach level</li> <li>Investment Impact</li> </ul>
Media	Ongoing	<ul style="list-style-type: none"> <li>Press releases</li> <li>Social media engagements</li> </ul>	<ul style="list-style-type: none"> <li>Business development and growth</li> </ul>
Employee	Ongoing and quarterly townhalls	<ul style="list-style-type: none"> <li>Training and Development</li> <li>Engagement activities</li> <li>Townhalls</li> <li>Newsletters</li> <li>Portal</li> </ul>	<ul style="list-style-type: none"> <li>Well-being</li> <li>Performance review</li> <li>Feedback</li> <li>Career development plan</li> </ul>
	Quarterly	<ul style="list-style-type: none"> <li>Communication on Awareness of Data Privacy</li> </ul>	
	Annually	<ul style="list-style-type: none"> <li>Appraisals</li> <li>Group Level Global Summits</li> <li>Communication on Awareness of Data Privacy</li> </ul>	

# Corporate Governance

## Governance Framework

As we embark on our Sustainability Journey, edotco has mapped out a Governance Framework that will serve to guide us in tightening our policies and processes to govern the adoption of Sustainability within our organisation.



edotco’s Governance Structure is centred around upholding the integrity of our organisation in every undertaking and engagement that we may have both internally and externally. We aspire to embody this world-class level of integrity throughout our 3 strategy pillars:

- Sustainable Growth
- ASEAN Championship
- World Class Hygiene

Within this framework, the core of our Governance framework will be the Board Oversight as defined in the highest level of our Governance Structure. The Board is well supported by:

- Board Risk and Compliance Committee (BRCC)
- Board Nomination and Remuneration Committee (BNRC)
- Related Party Transaction Committee (RPTC)
- Board Audit Committee (BAC)

Our 3 Lines of Defence to establish the level of governance desired will be fronted by:

1. **Business Units:** within the business units, there are policies and expectations that encompass:
  - Code of Conduct, Conflict of Interests Guidelines
  - Policies, Processes and Procedures
  - Systems and Applications
  - Data Analytics
  - Occupational Health and Safety
2. **Risk and Oversight:** the team will utilise the following levers to effectively establish desired benchmarks:
  - Enterprise Risk Management and Advisory
  - Compliance and Integrity
  - Business Continuity Management
  - Independent Risk Advisory
  - Digital Security
3. **Independent Assurance:** where and when necessary, we will engage independent assurers to uphold the utmost objectivity in areas of:
  - Consequences Management and Disciplinary Actions
  - Whistleblowing
  - Investigation
  - Audit

## Corporate Governance

### Governance Commitment and Roadmap

In 2021, edotco made 2 commitments in the area of Governance, as per below:

#### GOVERNANCE COMMITMENT

edotco Group upholds rigorous standards of transparency and accountability, guided by a framework that establishes clear responsibility and authority in a well-defined governance structure. The Board recognises the importance of governance and plays an active role in administering and reviewing the Group’s governance practices and framework to ensure its relevance and ability to meet future challenges.

One of our Board approved risk appetite statements focus on promoting a strong risk culture built on integrity and high ethical standards. We have a low appetite for any risks which may lead to material reputational damage, regulatory action/censure or significant losses.

#### ANTI-BRIBERY ANTI-CORRUPTION COMMITMENT

edotco Group continues to strengthen its integrity-related framework to bring the objectives of the National Anti-Corruption Plan 2019-2023 (NACP) to fruition. As such, various programmes have been implemented for all our stakeholders including edotco employees, customers and suppliers towards achieving this purpose.

The Board has approved the development and execution of the organisational Integrity and Anti-Corruption Plan (IACP) targeted for completion by end of 2022 where individual deliverables under the IACP are reported directly to the Board Risk and Compliance Committee (BRCC).

In order to fulfill our aspired framework, edotco has charted a progressive governance roadmap over 5 years, starting last year. Significantly, the goals in the first year have been successfully achieved. Various challenges were also faced in pursuing these goals including establishing the framework of Group Governance, Risk and Compliance team, designing and implementing targeted policies, training of edotco Group stakeholders and ensuring effective adoption of relevant controls.

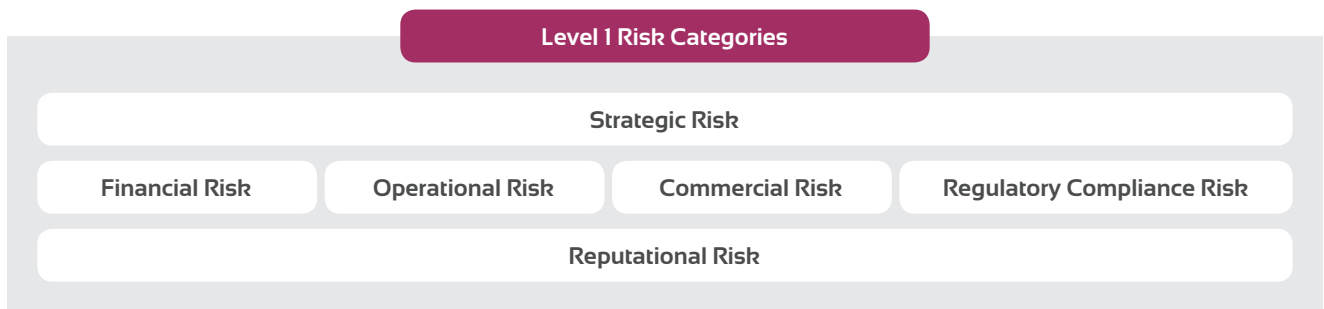


## Corporate Governance

### Risk Management

In 2021, edotco’s risk management framework was explored more comprehensively, resulting in the establishment of the Risk Taxonomy as well as defining edotco’s risk appetite statements around our Risk Taxonomy. The Risk Taxonomy identifies 6 categories, namely Strategic, Financial, Operational, Commercial, Regulatory Compliance and Reputational Risks. The biggest challenge in determining edotco’s Sustainability risks is understanding the boundaries of all ESG risk factors and determining how they affect existing considerations.

Sustainability Risk has been embedded in the risk register under Strategic Risk and all of our Board approved risk appetite statements have been operationalised.



“We, at edotco Bangladesh, accelerate growth and manage risks with continued efforts to strengthen our governance.”

“It is not just about what the company’s risk appetite is but more importantly, we as employees understand these risks and manage them in accordance with the company’s appetite.”



**Ng Sook Wai**  
Head of Enterprise Risk Management and Business Continuity Management, edotco Group



**Ishrat Zerín**  
Director of Corporate Affairs & Planning, edotco Bangladesh



## Corporate Governance

### Governance Matters

#### Precautionary Approach

##### edotco's Integrity and Anti-Corruption Plan (IACP)

The IACP is designed to uphold our commitment to integrity and to comply with the Guidelines on Adequate Procedures. This subsequently addresses the requirement under Section 17A of the Malaysian Anti-Corruption Commission (MACC) Act. This standard is equivalent to global standards as observed in the relevant Anti-Bribery and Anti-Corruption (ABAC) regulations in all National Tower Companies (NTCs), and has been endorsed by Board. The IACP is in place to ensure edotco's compliance programme remains relevant and is monitored by the Board.

##### Policies, Procedures and Guidelines

- ABAC Policy & Procedures
- Gift, Donation and Sponsorship (GDS) Policy & Procedures
- Supplier Code of Conduct (SCOC)
- Whistleblowing/Speak Up Policy and Procedures
- AML Guidelines
- Know-Your-Counterparty (KYC) Form
- Branding, Advertising, Marketing and Sponsorship (BAMS) Policy

##### Tracking and Reporting

- No report of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices
- No non-compliance incidents with laws and regulations in the social and economic area
- Consolidation and monitoring of integrity related matters in edotco's risk register
- Preparation of Corruption Risk Register for Group Level
- No reported incidents of corruption at edotco

##### Training and Awareness

- Inaugural edotco's Integrity Day and Inaugural edotco's Ethics and Compliance Week
- Festive Reminder Communications to employees and vendors
- Targeted ABAC and GDS training and awareness
- Constant engagement with relevant external stakeholder e.g. MACC and UNGC



This is in accordance with the **TRUST** Principles by the Malaysian Prime Minister's Office

**T**

Top Level  
Commitment

**R**

Risk  
Assessment

**U**

Undertaking  
Control Measures

**S**

Systematic Review  
and Monitoring

**T**

Training and  
Communication

“We continue to improve ourselves through annual review of our Standard Operating Procedures (SOP) and challenge our practices via certification.”



**Meng Heng Than**  
Specialist of Risk & Compliance,  
edotco Cambodia

## Corporate Governance

### Governance Initiatives

Governance initiatives undertaken for 2021 are as listed below alongside the targets for 2022 as the initiatives continue.

Focus Areas	Initiatives	2021	Target 2022
<b>Anti-Bribery and Anti-Corruption (ABAC) Policies, Procedures &amp; Guidelines</b>	Anti-Bribery and Anti-Corruption (ABAC) Policy	Completed - 100% Group Level	100% (All NTCs)
	ABAC Procedures	-	100% (Group and All NTCs)
	Gifts, Donations and Sponsorships (GDS) Policy	Completed - 100% Group Level	100% (All NTCs)
	GDS Procedures	-	100% (Group and All NTCs)
	Branding, Advertising & Marketing and Sponsorship Policy (BAMS) Policy	-	100% (Group and All NTCs)
	Anti-Money Laundering (AML) Guidelines	-	100% (Group and All NTCs)
	Supplier Code of Conduct	In Place	In Place
	Conflict of Interest Guidelines	-	100% (Group and all NTCs)
	Know-Your-Counterparty (KYC) Form	Completed - 100% Group Level	100% (All NTCs)
	Corruption Risk Register	-	100% (Group and All NTCs)
<b>Compliance Governance</b>	Completion of Integrity and Anti-Corruption Plan (IACP) to comply with S.17A MACC Act 2009 (corporate liability)	84%	100%
	ISO 37001:2016 (Anti-Bribery Management System) Certification	-	100%
	Mandatory ABAC training for all employees	Completed - 100%	100%
	Malaysian Anti-Corruption Commission (MACC)'s Corporate Integrity System Malaysia (CISM)	-	100%
<b>Data Privacy</b>	Roll out regional training (New e-learning module developed)	100%	100%
<b>Cybersecurity</b>	NIST Maturity	-	15% improvement from audited score
	Group Awareness Education	100%	100%
	Information Security Policy	Completed - 100% Group Level	100% (All NTCs)
<b>OHS</b>	NTC with ISO 45001:2018 Certification	Malaysia, Myanmar, Pakistan, Bangladesh	Cambodia
	OHS Number of Training	105	120
<b>Risk Management</b>	Risk Management Framework	In Place	In Place
	Business Continuity Management Framework	In Place	In Place

## Corporate Governance

### Governance Through Diligent Digital Security



*Muhammad Firdaus Juhari*  
Head of Digital Security,  
edotco Group

“Data Protection & Secure Digital Experience are our team’s top priorities.”

edotco has implemented a variety of initiatives to enhance our digital security infrastructure to create a safe environment for our employees, our customers and our suppliers.

#### Security Programme

Our security programme is designed based on the NIST Cybersecurity Framework with security policies to ensure continuous compliance. The programme is independently audited every 2 years to ensure that we are at the right level of cyber maturity.

#### Incident Handling

Incident handling procedures and playbooks are in place and regularly tested to ensure relevancy to the current possible threat landscape. Our security team members are trained to handle incidents effectively and we are supported by competent partners in forensic investigation.

#### Data Security

The security of our business data and Personally Identifiable Information (PII) is governed by our data governance policy. We enforce data classification throughout the company and we have information leakage protection controls including encryption, device-based data download, secure data access and data labelling in place.

#### System Security

Our IT infrastructure and business applications are monitored 24/7/365 as a proactive measure to detect any security threats. We also run regular security assessment programmes that cover all critical infrastructure and business applications to proactively detect and address vulnerabilities within our operating environment.

#### Third Party Risk

All our technology providers are governed through our Third Party Risk Management Procedure. All contracts are thoroughly reviewed to ensure that we’re legally protected. Existing technology providers are regularly monitored for assurance and protection against security risks.

#### Secure Development

New system onboarding or system changes are governed by a stringent security process to ensure that our systems are delivered to our staff and partners securely. The security review is performed from selection to implementation phase and any security gaps detected along the way are addressed immediately.

#### Access Control

Access to our IT infrastructure and business applications is secured with Multi-Factor Authentication (MFA) and contextualised access policy. We continuously monitor user ID activities and system access is reviewed frequently. Privilege IDs are managed via comprehensive access management procedure and Product Information Management (PIM) technology.

#### Workforce Security

Our security team members are certified and provided with professional training. We are also part of a strong security collaboration circle under the Axiata Group of companies. Our staff is provided with annual e-learning and monthly security awareness bulletin. The team also conducts monthly phishing simulation exercises.

#### Communication Security

Our network is protected by modern security solutions including a web application firewall, Anti-DDOS, web and email filtering and zero-trust network architecture. 3<sup>rd</sup> party access to our network is controlled by Privilege Access Management (PAM) technology and policy. Our network is regularly scanned to detect vulnerabilities or rogue elements.

#### Cloud Security

Our cloud workloads are regularly scanned to detect and address vulnerabilities. Cloud service configurations are regularly reviewed to ensure alignment with industry best practices. We also require our cloud providers to be compliant with industry standards including ISO27001 and Service Organisations Certificate (SOC).

#### Software/URL Control

Company-issued laptops are centrally managed and installation of non-standard software or access to URLs are controlled through a stringent whitelisting process that centres around valid business justification. Usage of software is actively monitored to maintain security hygiene on company-issued laptops.

#### Mobile Security

All company-issued mobile devices are protected with mobile device management (MDM) that provides secure configuration. Our Bring Your Own Device (BYOD) programme is supported by acceptable user policy and mobile application management technology to protect against malware threats and data leakage.

GRI 418-1

## Corporate Governance

### Governance Through Diligent Digital Security



#### Data Privacy

Our Data Privacy framework, policies and procedures are in place, have been communicated to all employees and published on our website. For continuous improvement, our data privacy team works closely with Axiata Group and external consultant to conduct data privacy assessment every 2 years.

The initiatives and programmes undertaken to strengthen data privacy maturity include:

- » Mandatory e-learning modules completed by all employees and high-risk vendors who process employees' personal data; 100% completed for all employees and vendors
- » Capacity building for the Certified Information Privacy Manager (CIPM) certification
- » Ongoing NIST Maturity Programme
- » Communications for awareness published on a quarterly basis
- » Employee engagement activities through quizzes and Data Privacy Day 2021 held during edotco Ethics and Compliance Week on 9<sup>th</sup> November 2021
- » Desktop walk through exercises conducted with NTCs together with our Business Continuity Management (BCM) team and independent consultant

No substantiated complaints received concerning breaches of internal and external stakeholders privacy matters as at 31 December 2021.



#### Cybersecurity

Cybersecurity in edotco is governed by Information Security Policy and a set of standards, procedures and guidelines covering different areas of cybersecurity as stipulated in security standards such as ISO 27001 or NIST 800-53.

To ensure our alignment with industry best practices, our cybersecurity framework is designed based on the NIST cybersecurity Framework with periodic maturity assessments. We are also a part of the larger group of cybersecurity working committee members of Axiata Group, through which we collaborate with other cybersecurity SMEs across the group on critical areas including threat intelligence, security architecture, policies, engineering, technologies and incident handling.

The initiatives and programmes undertaken to strengthen cybersecurity include:

- » Data Loss Prevention (DLP) and Business Impact Analysis (BIA)
- » Secure system deployment standard for all group digital initiatives
- » Vulnerability and threat management programmes
- » Cyber drill and red teaming exercises
- » Third-party risk management procedure & compliance monitoring
- » Active security monitoring for end users and our cloud resources
- » Systematic awareness (communication and e-learning) and phishing simulation activities
- » Due diligence to support post-acquisition security compliance



## Corporate Governance

### Policies



*Harginder Singh*  
Head of Ethics and Compliance, edotco Group

“Follow the golden rule of being compliant. There is no compromise.”

#### edotco Group Environmental Policy

##### 1 Policy Statement

edotco recognises that corporate responsibility constitutes part of the foundation of a sustainable society and is an important part of how we conduct our business. As an infrastructure company, we impact the environment directly through our activities and operations as well as indirectly through our stakeholders. This Policy sets out the key principles the edotco Group is guided to conduct responsible and sustainable business activities across edotco Group and is applicable to all Board members, employees, and subsidiaries. We are committed to the following principles:

##### Principle 1: Compliance with Environmental Laws

edotco will comply with all relevant environmental laws across our footprint. Where feasible, we will establish and maintain our own standards that exceed the requirements of existing laws and regulations.

##### Principle 2: Pollution Prevention

edotco will minimise solid waste generation and potential release of pollutants into the environment (both ground and air related) first through source reduction, secondarily through reuse and recycling, and finally through treatment and disposal. We strive to minimise our operational impacts by reducing our carbon footprint.

##### Principle 3: Take Action Against Climate Change

Our long-term ambition is to reduce emissions to zero and create resilient business as a result of our actions. As we progress towards net zero emissions, our medium-term target is to be 100% carbon neutral by 2030. To achieve this, we shall take measures to significantly decrease greenhouse gas emissions in our own operations and will work with reputable partners to achieve this goal, including, when needed, offsetting our emissions. We will also build resilience into our networks and services to adapt to the impacts of climate change.

##### Principle 4: Green Technology

edotco will actively endeavour to adopt technology that is efficient and sustainable while continuously improving our products and services through adoption of feasible technology.

##### Principle 5: Environmental Education and Awareness

edotco will provide ongoing education for all employees and external stakeholders with regards to the importance of environmental responsibility across our footprint.

##### Principle 6: Responsible Reporting

edotco believes in transparency, and will regularly report advancement regarding environmental performance, including progress towards our environmental targets, to our stakeholders via our Sustainability Report.

##### Principle 7: Environmentally Responsible Growth

edotco will promote environmental responsibility through our merger and acquisition, contracting and purchasing choices across our supply chain. When purchasing products and services, we consider environmental impacts along with cost and functional performance.

##### 2 Accountability

The requirements of this policy apply to all edotco entities (Group and subsidiaries), Board of Directors and employees. They will always observe the following:

- » Understand and follow applicable policies.
- » Take all reasonable and practical measures to protect the environment.
- » Engage with relevant stakeholders to address environmental issues relevant to site selection, build, and operations.
- » Identify and implement opportunities to improve environmental impact, for example, energy reduction opportunities, material reuse.
- » Prepare, identify and respond to environmental incidents following relevant Health and Safety policies and ceasing work, if required.

The Policy is owned by the Engineering Department who monitors and reviews the relevancy of the Policy on annual basis with oversight by the Sustainability Unit for the purpose of Sustainability Reporting.

##### 3 How to report violations

Employees are encouraged and expected to report incidents of non-compliance. Violation of this Group Policy maybe reported to the Policy Holder i.e., Engineering Department, or anonymously to the Whistleblowing Channel. Anyone reporting a violation shall, to the extent legally permissible, have the possibility to remain anonymous. edotco has a non-retaliation policy and will ensure that there are no adverse work-related consequences for any employee who, in good faith, alerts management of possible violations of this policy.

## Corporate Governance

### Whistleblowing Procedures

edotco Group has a robust Whistleblowing Procedure, supplemented by a clear reporting process, a transparent investigation process and a structured consequence management process.



A summary of edotco's whistleblowing process

#### Reporting Stage

Speak-Up channel is handled by a professional, independent third party via a secure and confidential web-based system, which is accessible in local languages and is available 24 hours a day, 7 days a week at: <https://axiatagroup.integrityline.com/>

**Available Languages in Speak Up Channel Landing page**

Welcome to Axiata's Speak Up site  
**Uncompromising Integrity** is one of the core values embraced by Axiata and its operating companies/subsidiaries. We are committed to upholding the highest standards of lawful and ethical conduct, by demonstrating honesty, fairness and accountability in all our dealings. If you are aware of actual or suspected misconduct, illegal or unethical behaviour, or have any concerns - **Speak Up**.

#### Investigation Stage

edotco investigations are guided by the Axiata and Association of Certified Fraud Examiners (ACFE) principles and the confidentiality of the reporter and the information disclosed are protected.

Investigations are conducted in 4 stages:



#### Consequence Management Stage

Consequence management, including disciplinary actions, shall be meted out according to edotco's Disciplinary Policy and Code of Conduct. Any act of bribery or corruption is classified under Major Misconduct in edotco's Disciplinary Policy.

##### Records of Concerns Raised

Details of all concerns raised (investigated or not) shall be maintained for a minimum period of retention according to the respective laws in countries which edotco operates

## Corporate Governance

### edotco List of Policies

Policy Titles	Published Internally	Published Externally
Code of Conduct	✓	Available at our company website: <a href="http://www.edotcogroup.com">www.edotcogroup.com</a>
Supplier Code of Conduct	✓	Available at our company website: <a href="http://www.edotcogroup.com">www.edotcogroup.com</a>
Privacy Policy	✓	Available at our company website: <a href="http://www.edotcogroup.com">www.edotcogroup.com</a>
Whistleblowing/Speaking Up Policy and Procedures	✓	Available at our company website: <a href="http://www.edotcogroup.com">www.edotcogroup.com</a>
Anti-Bribery and Anti-Corruption Policy	✓	Available at our company website: <a href="http://www.edotcogroup.com">www.edotcogroup.com</a>
Anti-Bribery and Anti-Corruption Policy Statement	✓	Available at our company website: <a href="http://www.edotcogroup.com">www.edotcogroup.com</a>
ABAC Clauses	✓	Available at our company website: <a href="http://www.edotcogroup.com">www.edotcogroup.com</a>
Conflict of Interest Guidelines	✓	-
Branding, Advertising, Marketing and Sponsorships (BAMS) Policy	✓	-
Gifts, Donations and Sponsorships (GDS) Policy	✓	Available at our company website: <a href="http://www.edotcogroup.com">www.edotcogroup.com</a>
Group Environmental Policy	✓	Available at our company website: <a href="http://www.edotcogroup.com">www.edotcogroup.com</a>
Occupational Health, Safety and Environmental Policy	✓	Available at our company website: <a href="http://www.edotcogroup.com">www.edotcogroup.com</a>
Employment Contracts Increment and Performance Bonus Policy	✓	-
Learning and Development Policy	✓	-
Performance Management Policy	✓	-
Recruitment Policy	✓	-
Rewards and Recognition Policy	✓	-
Talent Management Policy	✓	-
Work Schedule Policy	✓	-

## Corporate Governance

Policy Titles	Published Internally	Published Externally
Birthday Leave Policy	✓	-
Business Reimbursements Policy	✓	-
Care & Compassion Policy	✓	-
Communication Policy	✓	-
Dental & Optical Policy	✓	-
Leave Policy	✓	-
Site Acquisition (SAQ) & Permitting Policy	✓	-
Enterprise Risk Management (ERM) Policy	✓	-
Information Security Policy	✓	-
<i>Human Rights Policy (draft)</i>	-	-
<i>Non Complicit to Human Rights Policy (draft)</i>	-	-
<i>Freedom of Employees Association Policy (draft)</i>	-	-
<i>None Forced Labour Policy (draft)</i>	-	-
<i>Non Discriminatory Policy (draft)</i>	-	-
<i>Child Labour Policy (draft)</i>	-	-









# Towards a Low Carbon Economy

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# Building Our Decarbonisation Strategy

## Our Decarbonisation Journey

As edotco continues to build our understanding of decarbonisation, we understand the magnitude of our responsibilities and tasks that lay ahead. In this exploration, we have evaluated different concepts, strategies and plans that have been both exciting and challenging for us at the same time. We are committed to report on our efforts throughout this discovery process, beginning with this inaugural report.

### Greenhouse Gases (GHG) Emissions Approach

In ensuring an accurate accounting of our current GHG emission levels, below is our preliminary approach. A GHG consultant has been engaged in 2022 to develop a GHG inventory and carbon roadmap plan that will detail short, mid and long term targets.

### Decarbonisation Strategy

edotco is building a decarbonisation strategy and framework that defines a plan for the organisation towards our carbon neutral goal in alignment with the strategy from our parent company Axiata.

### GHG Emissions Categories in Consideration

edotco's  
Total Carbon  
Footprint

#### Scope 1: Direct emissions from owned or controlled sources

Site Built Construction

Company Vehicles and Offices

#### Scope 2: Indirect emissions from the generation of purchased energy

Site Built Construction

Offices

#### Scope 3: Indirect emissions that occur in the value chain

Purchased Goods and Services

Capital Goods

Upstream Transportation and Distribution

Downstream Leased Assets

Waste Generated in Operations

Business Travel

Employee Commuting

*Filomena Veto*  
Director of Finance,  
edotco Philippines



“As we grow in Philippines, we initiate and intensify environmental management activities including awareness campaign within our organisation.”

## Building Our Decarbonisation Strategy

### Decarbonisation Policies and Oversight

edotco is conscious of the need for environmental stewardship in our industry and has innovated our tower designs towards building more environmentally-friendly telecommunication structures. Along these lines, we are developing a Carbon Neutrality Framework, guided by our carbon neutral goal and net zero target.

edotco is in the process of verifying the Carbon Emission Reduction Projects with SIRIM QAS. This involves a verification process by SIRIM QAS upon submission of site build optimisation project reports that is accordance to ISO 14064-2. edotco has submitted our report per ISO to SIRIM QAS and received the initial endorsement for the Carbon emission reduction project.

### Achievements and Challenges

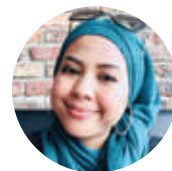
#### ACHIEVEMENTS:

1. Carbon footprint reduction has been achieved through site build optimisation alongside green energy solutions
2. 30% of our carbon footprint was reduced as a result of migrating the existing office network infrastructure to a cloud-based network (Cisco Meraki)
3. The percentage of electrified sites increased from 91% to 93% bringing the total number of electrified sites to >15,000 in 2021

#### CHALLENGES:

1. edotco currently faces limitations on the ability to deploy structures with optimised designs due to local authority regulations and build guidelines at each country
2. Carbon footprint reduction has been achieved through site build optimisation and selected energy solutions
3. Solar deployments are dependent on a multitude of factors that need to be uniquely evaluated such as location suitability, space availability, business feasibility and other external factors
4. The decentralised sites require Power Purchase Agreement (PPA) but the guidelines for PPA are yet to be established by the Energy Commissions
5. The decarbonisation of grid sites greatly depend on the energy mix of the energy infrastructure companies of the country
6. There are currently a limited number of vendors adopting carbon protocols in this region

“A sustainable business not only helps ‘future proof’ supply chain, it also fuels innovation and drives brand growth.”



*Siti Aishah Baharudin  
Head of Strategy,  
edotco Group*

#### Way Forward

- Establish group-wide validated GHG inventory
- Formulate edotco's Decarbonisation Strategy
- Review and set edotco's Carbon Reduction Targets



# Optimising Our Operations

## Greener Towers: Decarbonising Our Towers

### Decarbonising the Build and Use of Our Towers

In our transition towards a lower carbon footprint, edotco’s biggest possible reduction is in the build and use of our towers.

This includes building greener infrastructure, improving energy efficiency of the site, optimising site waste management and investing in renewable technologies.

edotco’s tower carbon reduction strategy monitors the reduction of embodied carbon and energy use of the towers. These figures are compiled, assessed and quantified externally.

Initiatives	Reduction in Carbon Emissions Per Site
Design and construct 3-legged towers, which use 30% less steel (27% less structure tonnage) as compared to existing 4-legged towers.	25%
More innovative tower designs that optimise the use of materials	25%-66%
18 carbon fibre towers	20%
31 bamboo towers	70%

### Towards Greener Towers



#### Carbon footprint reduction

Life-cycle approach

Leaner lighter structures

Alternative construction materials

“ In edotco, it is our goal to ensure that sustainability becomes a guiding principle in the way we do business. Being resource-efficient and respecting our environment is part of our corporate DNA and culture. ”



**Reuben Ponniah**  
Head, Infrastructure Rollout & Technical Analysis, edotco Group

### Way Forward

- Continue exploring new materials as alternatives for tower structures
- Continue innovating designs into leaner and lighter tower structures without compromising the integrity and safety of the tower

## Optimising Our Operations

### Greener Towers: Alternative and Efficient Energy

#### Energy Consumption

edotco has kickstarted our journey towards measuring our emissions by tracking our diesel and electricity consumption and will progressively report our data. For 2021, the total energy consumption was as follows:

<b>Overall Energy (GWh)</b> 615	<b>Electricity (GWh)</b> 547	<b>Fuel (litres)</b> 21.8 million	<b>Renewable Generation (GWh)</b> 10
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Overall, there has been increased efficiency in fuel consumption in 2021 as compared to 2020. On a per site basis, there is a drop of approximately 15% of fuel consumption. This is mainly due to the increasing reliability of the grid which has resulted in the removal of generators from site. Another contributing factor is the lowered generator run hours achieved by combining the generators with every renewable solution such as solar and battery.

#### Switching to Renewable Energy

edotco has diligently worked on sourcing alternative energy due to the high consumption of energy per tower and increasing our renewable energy portfolio wherever commercially feasible. This becomes progressively critical as our energy use continues to increase due to the increase in the number of sites.

In 2021, we have successfully made the following progress in energy efficiency:

<b>60% increase in renewable energy</b> by edotco Group from 2020	<b>Increase in renewable energy sites to 2,350 sites in 2021</b> from 1,692 sites in 2020	
<b>37,696 GJ of renewable energy produced</b> more concise	<b>2,000kWp of solar installed</b> across our operating markets	<b>Solar</b> Total 2,207 sites
<b>Wind turbine</b> Total 12 sites	<b>Solar Air Conditioners</b> totalled <b>124 sites</b>	<b>Solar-Wind Hybrids</b> totalled <b>5 sites</b>

#### Way Forward

- Continue to deploy suitable renewable energy at sites in line with edotco's Decarbonisation Strategy
- Initiate discussions with power provider on establishing PPA to realise our longer-term decarbonisation goals

## Optimising Our Operations

### Greener Towers: Ensuring Optimum Environmental Management

#### Operational Waste Management

End-of-life treatment of materials is detailed to ensure effective waste management:

<p>e-Waste from energy systems such as Valve Regulated Lead-Acid (VRLA) batteries and rectifiers will be refurbished or recycled</p>	<p>Towers will be decommissioned at the end of its service and parts are recycled or refurbished depending on its condition</p>	<p>During site build or maintenance activities, edotco ensures that the waste generated by our suppliers is managed in accordance to edotco's Green Framework and Suppliers Sustainability Code of Conduct</p>	<p>Tower structures and civil works are designed and executed according to the Green Framework as managed by the CoDE team</p>
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There have been no reports of non-compliance with environmental laws and regulations.

#### GUIDANCE AVAILABLE:

- edotco's OHS Environment Management plan provides guidelines for scheduled waste management and waste minimisation
- edotco's Green Framework provides guidelines on site waste management initiatives
- edotco's Supplier Sustainability Code of Conduct provides guidelines to ensure sustainable packaging practices are implemented by suppliers

Waste Management Data	Details
Amount of waste generated	<ul style="list-style-type: none"> <li>• Site: e-waste - 908.8 tonnes</li> <li>• Offices: Plastic, aluminium and paper waste - 545.1 kg</li> </ul>
Mobile recycling programmes	This programme is ongoing and to date has collected 38.9 kg of recyclables

#### CHALLENGES:

- Majority of our vendors are still progressively implementing site waste management initiatives
- Each NTC's reporting is currently based on the availability of resources



#### Way Forward

- Proliferation of site waste management to all NTCs
- Update edotco green framework to further manage waste generated
- Establishing a baseline for each NTC on data collection for site waste management monitoring



## Optimising Our Operations

### Greener Offices: Early Stage Adoption

edotco's Green Office Programme was launched in 2019 and continuously championed till date. The objective of the programme is to reduce our carbon footprint in our offices while boosting productivity. The measurement of performance will be quantified via each NTC's Green Scorecard.

Though many initiatives at this early stage are not greatly impactful to our carbon footprint, it has fostered increased excitement, ownership and the right behaviour with regards to conserving the environment around us. At this stage, some of the Green Office initiatives implemented include:

- Green champion
- Recycle bins
- No plastics bottles
- Aerators
- Hand dryers
- Green marketing material
- Switch labels
- Double sided-print
- e-print
- Plants
- Cups/lunchboxes
- LED/sensor lights
- Inverter air-conditioner

These initiatives are being tracked via a green checklist.

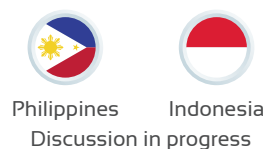
Green champions have been elected to represent each NTC for discussions on Climate and Environmental plans and agenda. These Green Champions are the point people for the roll-out of Green Office initiatives and are responsible for increasing awareness and engagement towards the successful adoption of these initiatives.

Overall the NTCs have so far achieved 85% implementation as at December 2021.

#### Each NTC's implementation status as end 2021



#### Future green office implementations in new NTCs



#### Way Forward

- Implementing more efficient energy equipment in offices
- Raising further awareness on the importance of adopting green practices in daily life

## Optimising Our Operations

### Greener Offices: Recycling



Recycling was introduced to all NTCs to encourage awareness and to cultivate recycling habit.

edotco Corporate Centre and edotco Malaysia conduct monthly recycling programmes for offices in Axiata Tower with the collaboration of Trash4Cash and Global Peace Mission (GPM). Proceeds from the recyclables collection are channelled to the GPM foundation.

E-waste collection bins are also stationed at the Malaysian-based offices in collaboration with Malaysian Communications and Multimedia Commission (MCMC) for the Mobile E-Waste Collection programme. E-waste collections are subsequently sent for material recovery.

With internal studies indicating that used oil waste management is a neglected area, edotco will enter a used oil recycling programme in 2022 while also finalising the Memorandum of Understanding with associated partners. We are currently looking for partners to further collaborate in this initiative. Please reach out to us if interested as together, we can make a positive impact on our planet.

#### CHALLENGES:

Most of the NTCS do not have proper facilities and enough resources to carry out recycling activities on a monthly basis

#### Way Forward

- Proliferate the recycling programme and e-waste collection effectively to all NTCs
- Collaborate with partners on used oil recycling programme
- Provide a green framework to manage the waste generated in office

## Optimising Our Operations

### Carbon Sequestration

In addition to our Greener Towers and Greener Offices initiatives, edotco has undertaken tree-planting across our countries since 2018 as one of our sustainability efforts.

This Carbon Sequestration initiative, which supports our carbon neutral ambition, is currently undertaken via our Employee Voluntary Engagement activities.

This effort encompasses two key areas of focus:

**Collection and recycling of used oil to be repurposed**

**Reforestation efforts for ongoing carbon offsetting goals**

**To date edotco has planted more than 38,000 plants across the region.**

In 2022, edotco will focus on collaboration among several parties, namely the authorities and ministries for the reforestation efforts.

#### KEY SCOPE OF WORK:

Enable used oil collection activities with communities and food and beverages outlets.

Match collection data with edotco's pledge. For every 10 kg, edotco will plant 1 tree to cover our carbon shortfall via other initiatives.

Awareness, application support and provision of containers

Enable reforestation efforts at forest reserve areas and roll out planting activities.

Reforestation efforts to sequester carbon emissions

#### Programme Benefits:

- » Develops a sustainable business model around digital solutions for tree planting initiatives and waste management
- » Contributes to the SDGs and UNGC principles
- » Creates and maintains relationships among local networks e.g., government bodies and social enterprises
- » Supports low-income communities
- » Allows employee volunteerism

#### Way Forward

- Scale up the initiative by launching a group-wide campaign to recycle used oil in order to create awareness of effective waste management
- Commit to a minimum number of trees planted in line with edotco's carbon neutral aspiration

# Innovating for Tomorrow/Next-Generation

## Green Engineering: Structure and Site Design

Innovation is key to the edotco culture and as we continue to challenge the boundaries of the industry, conscious effort is taken to innovate for the good of the environment within our towers. We understood the challenges in our footprint including grid availabilities as well as relevant geolandscapes' limitations. Some green considerations include:

1. Ensuring that the structures built are for the right loading requirement. (Loading refers to the number of radio frequency antennas and microwave dishes on a structure)
2. Exploration of alternative material for structures with the aim of reducing the carbon emission
3. Reduction of tonnage (weight) of structures, thereby reducing materials required. Reduced material requirement translates to a reduction in carbon emission. (Example: A 45-m 4-legged tower requires 9,876 kg of steel while a 45-m 3-legged tower requires 6,794 kg of steel which shows a 31% reduction in raw material requirement)
4. Optimisation of site foundation design which results in the reduction of material requirement. (Example: The material (concrete and steel) requirement for the foundation works of an optimised design is 20% to 30% less compared to the foundation works of a traditional foundation design)
5. Ensuring optimal site layout to reduce the volume of material used for site build (Example: With an optimal site layout, 30% reduction in material requirement (concrete and steel) can be achieved as compared to a traditional site layout)

### Self-supported Structures

The reason behind this innovative change from 4 legged structure to the present day self-supported structures (3-legged) is to reduce material usage such as steel and concrete.

### Lean Structures

Similarly, through design innovations, steel consumption can be reduced by approximately 30%. This design innovation by edotco not only reduces the tonnage of the structure but ensures the purpose of the tower fully meets the requirement of customers efficiently without wasting energy and resources.



### Way Forward

- Continue to innovate tower designs towards leaner and lighter tower structures without compromising the integrity and safety of the tower
- Continue to push the boundaries of design to serve our green agenda



## Innovating for Tomorrow/Next-Generation

### Green Engineering: Alternative Materials

edotco is the first telecommunications infrastructure company to experiment with alternative material for tower structures. Alternative materials are materials that have strength similar to and can serve the same purpose as steel but produced much lower carbon emissions. Featured here are two types of alternative materials that edotco has successfully deployed in the field.

#### CARBON FIBRE

edotco successfully introduced the inception of carbon fibre towers as an innovative solution towards more sustainable towers. It carries with it the inherent properties of being:

- **Strong:** Five times stronger and two times stiffer than steel, the high rigidity in withstanding climate conditions like strong winds and corrosion resistant nature is favourable
- **Light:** 70% reduction in weight compared to conventional steel structures, resulting in a reduction of material required for foundation construction, and leaving behind a smaller carbon footprint
- **Fast:** 40% to 50% faster to install this structure as compared to steel towers



#### BAMBOO

edotco collaborated with Bangladesh University of Engineering and Technology (BUET) to conduct research to explore potential uses of bamboo structures to replace steel structures on rooftops. As a result of the collaboration, edotco became the first Tower Sharing Company to introduce Bamboo Towers as a rooftop solution. edotco launched its first bamboo tower, a 6m truss tower on 28<sup>th</sup> March 2017 which was installed on a rooftop in the Uttara region of Dhaka, Bangladesh, resulting in a bamboo tower that:

- Has the capacity to house up to 8 antennas to enable co-location,
- Is 88% lighter compared to a steel structure, and
- Produces 70% less carbon emissions.



Sustainability can deliver significant cost savings through cost avoidance. As we champion sustainable innovation, our team at CoDE continues to focus on delivering growth and returns for our stakeholders.



*Zakir Hossain*  
Director of Centre of Design Excellence (CoDE), edotco Bangladesh



#### Way Forward

- Continue to explore new materials as alternatives for tower structures
- Usage of alternative materials for foundation reinforcements

## Innovating for Tomorrow/Next-generation

### Green Energy: Design and Solutions

To reduce environmental impact in powering telecommunication networks, energy designs and solutions incorporate the following measures:

1. Optimal use of energy resources (grid, diesel and renewable) and battery storage
2. Energy system designs that are catered for the real need of equipment load (technical designs more often have a strong impact on the financial feasibility of energy solutions)
3. Deployment of energy efficient equipment
4. Implementation of energy saving initiatives and use of renewable energy with an approach to optimise energy consumption
5. Co-location to save space and hardware resources
6. Intelligent monitoring and energy data management to increase power reliability
7. Implementation of monitoring equipment life cycle, waste management, recycling and disposal policies

#### RENEWABLE ENERGY SOURCES

24 x 7 energy provisioning is a critical aspect of telecommunication network operations to ensure consistent network availability. In many cases, due to a lack of reliable grid power, towers have to rely on diesel generators as both primary and backup power sources. The increasing cost of diesel, its associated maintenance and replacement cost, and our commitment to reducing our carbon footprint are key factors driving us towards use of green power. The diesel generators are also a major source of pollution. Green power is a better alternative to a diesel-based power solution for powering off-grid and bad grid telecommunication base station sites. In addition, the remote sites are difficult to approach for regular maintenance and refuelling of diesel generators, making the renewable solution more economically viable.

Green solutions such as solar, wind and fuel cell technology are commonly used in telecommunication applications with solar as the most acceptable and mainstream green power solution. The techno-commercial feasibility of a solar solution greatly depends on site load, land space, solar radiation and battery autonomy.

#### ENERGY STORAGE

edotco has explored energy storage solutions and has implemented Li-ion batteries at our sites. This solution has not only given edotco the lowest Total Cost of Ownership (TCO), but has reduced the required space and the overall weight of batteries. With the Li-ion's ability to fast-charge, generator running hours can also be reduced considerably. For the off-grid solutions, batteries will drain in cyclic mode and reduce the fuel consumption at site. All these benefits successfully reduce operating costs and environmental impact.

As part of edotco's aspirations to reduce carbon footprint, edotco will continue to explore the most viable options for renewable sites, with a main focus on solar. We will deploy additional Li-ion batteries whilst continuing to explore the best energy storage for our sites.



Scan here  
to view  
the video



#### ENERGY EFFICIENCY INITIATIVES

Besides adoption of renewable energy sources, energy efficiency is an important aspect of a green strategy. This optimises power systems by reducing the power requirement, the use of new efficient storage technologies and the use of an intelligent controller. Some of the energy efficiency initiatives in edotco include:

- **Conversion of Indoor Sites to Outdoor Sites**  
Indoor to outdoor conversion by deployment of intelligent ventilation system (IVS) with fan cooling units with a controller thus helps to eliminate the use of air conditioners and reduces 80% of the cooling energy consumption
- **Site Electrification**  
Site electrification is our top priority to make grid power available at sites as a primary energy source. The use of diesel generators as a back-up power source are eliminated at good grids and minimised at bad grids, thus reducing carbon emissions
- **Deployment of Hybrid Solutions**  
Deployment of adequate battery capacities with fast charging capability such as lithium ion batteries reduces diesel generator run time and carbon emissions at bad and off grid sites

GRI 102-12

## Collaborating for Impact

### National Greenhouse Gas Monitoring Network

edotco Malaysia formed a unique Public-Private Partnership with the Malaysian Meteorological Department (MET) to form the National Greenhouse Gas Monitoring Network. Currently, Malaysia hosts one of only 30 Global Atmosphere Watch (GAW) global stations in the world, and monitoring greenhouse gases is one of the mandatory observations of this station.

edotco Malaysia will be providing rent-free access and use of its towers to install GHG monitoring systems. The gases monitored are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>) and carbon monoxide (CO). Air sampling inlets for these gases need to be deployed at adequate heights to minimise the influence of local terrain and ground-level activity on the air samples collected.

Adequate space for a cabin at the base of the tower to house the monitoring equipment has also been allocated. Based on these requirements, edotco has identified its towers at Gunung Brinchang in Cameron Highlands (Pahang), Gunung Raya, Langkawi (Kedah) and Sabangkoi, Sarikei (Sarawak) to house the respective GHG monitoring systems. These new stations, together with an existing station in Danum Valley, will form the National Greenhouse Gas Monitoring Network.



*Tower with  
Greenhouse Gas  
Monitoring System*



*Wan Zainal,  
Country Managing  
Director with MET  
Representative to  
officiate the MoU*

### National 100 Million Tree Planting Campaign

edotco has committed to tree planting as one of our strategy to support our Sustainability Framework in Malaysia. The National 100 Million Tree Planting Campaign will run from 2021 to 2025. Under the purview of the Ministry of Energy, the theme of this campaign is "Our Trees, Our Life". The main objective of this campaign is to create awareness on the importance of the trees and to inculcate an appreciation of forests with the public.

The campaign runs parallel to the pact signed at the Rio Earth Summit to ensure that at least 50% of Malaysia's land area is covered with forestry. Achievements of the campaign will be recorded and reported on the official mobile application and website of National 100 Million Tree.



Since 2018, as part of edotco's efforts to support our carbon neutral aim, tree planting across our operating markets has been successfully run as an employee engagement programme. The initiative will be strengthened in 2022, in part to support this campaign.

**In 2021, 500 trees were planted, bringing the total trees planted to date to 38,500 trees.**

*Scan here to  
view the video*











# Towards a Healthy Workforce

Bionic Workforce

58

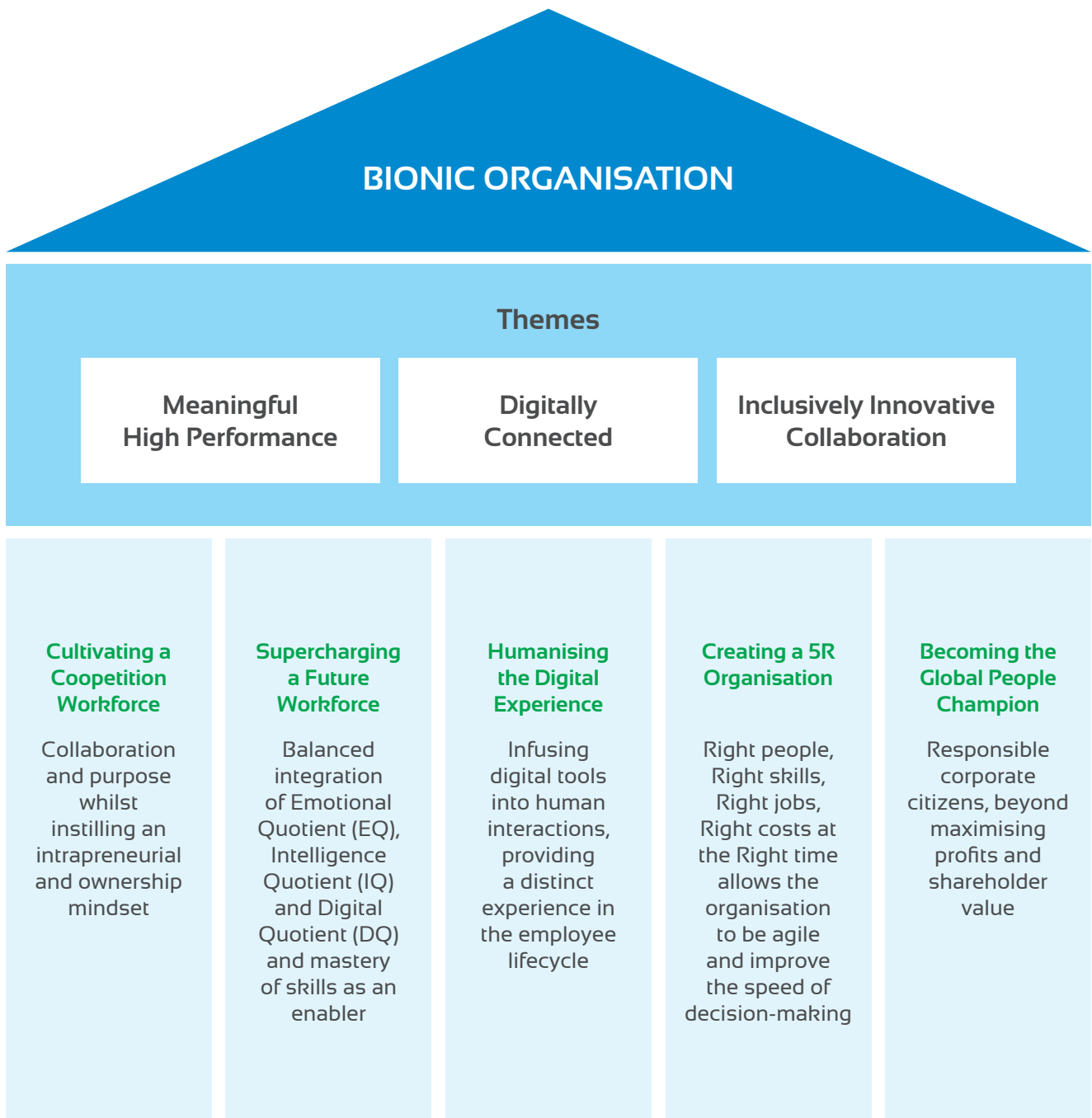
Prioritising Health and Safety

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# Bionic Workforce

## Human Capital Framework

edotco strives to create the right environment for a dynamic and innovative workforce. We further believe that the combination of people and technology will develop superior customer experiences, more productive operations and increased innovation.



## Bionic Workforce

### FOCUS AREAS:

We have identified 13 key people focus areas to achieve our aspiration of employee well-being and to create a healthy work environment.

Maintain high Employee Engagement with more **focus on building a Championship and intrapreneurial/ownership culture**

**Accelerate Middle Management development** by addressing skills gap required for the future

**Accelerate "Return on Experience" (ROX)** to ensure highest levels of employee experience throughout their employee lifecycle

**Enhance existing rewards** programme to **drive ownership and sales mentality**

**Develop clear career paths** for employees through effective **Succession Planning** and Senior Management **career discussions**

Enhanced focus on **Diversity, Equity and Inclusion (DEI) and ESG** - aligned to global standards

Enhancing Engineering/Operations-centric operating model **balanced with strong business development and stakeholder management**

Nurturing **"Digital Natives"** and cultivating **digital-centric mindset across all employees**

Stronger focus on **leadership collaboration and unity**

**Optimise organisational, functional structures and job scoping** at CC and NTC for higher efficiency/clarity

Adopting **data-driven decision making** to improve analytics rigor and **discern facts from noise**

**Upskilling for future proofing** especially in new revenue streams, product offerings, digital and data analytics

Humanising digital experience by **creating digital people and HR platforms** and **infusing tools into daily human interactions**

### CHALLENGES:

There have been systemic challenges observed in the workforce that are being addressed, namely:

1

#### Increased Need for Speed:

With the rapid pace of today's work environment, employees increasingly need to work and collaborate more effectively.

#### Solution:

Increased use of technology and real time employee engagement tools.

2

#### Creating a Future Ready Workforce:

Due to rapid technology changes, it is imperative for us as an organisation to future-proof our workforce by building future relevant skills.

#### Solution:

The talent management strategy has been two-pronged - building current skillsets, and identifying and building future-ready skillsets.

## Bionic Workforce

### Career Development and Leadership Training

edotco’s transformational and growth story begins with our people. To truly enable our people to be change agents and champions, the organisation undertook several phases of research to understand workforce trends and learning priorities. An essential component of this effort was to build a comprehensive, coordinated strategy that engaged the organisation and encouraged collaboration.

The outcome of this exploration is **The Bionic Organisation Framework** in edotco.

Building a Bionic Organisation is a whole new phase to our approach to edotco’s learning and development strategy. The finite balance of man and machine was critical and crucial in the design. The Bionic organisation is anchored on three simple pillars.

- 1 Focus from T-shape skillsets (i.e. deep skillsets in one area) to **M-shape skillsets** (broad-based skills and knowledge)
- 2 **Championship mindset** and behavior
- 3 **Intrapreneur and ownership mindset**

The delivery approach towards a Bionic Organisation will be unique and includes:

- An AI-embedded platform, the **Learning Experience Platforms (LXP)**, will empower employees to take charge of their own career and learning
- **edotco’s University**, which houses various faculties such the Energy Faculty, Civil Faculty, Commercial Academy and Digital Academy, will increase the learning in the organisation
- Partnering closely with **Business Schools** to deliver relevant and high-quality programmes
- Various **targeted Online Learning Platforms** including LinkedIn, Coursera, Udemy, Microsoft Learning Platform, AWS, Qanthon and more

Indicators	2021
Total training hours	33,405
Number of employees involved	1,219
Average training hours per employee	27
Average training hours (male)	28
Average training hours (female)	24
Average training hours (Senior Management/HRL20 above)	27
Average training hours (Middle Management/HRL17-19)	40
Average training hours (Executive/HRL12-16)	23
Average training hours (Non-Executive/HRL10-11)	6
Percentage of employees receiving regular performance and career development reviews	100%



## Bionic Workforce

### Employee Experience

edotco's focus over the past year was on building a "Championship Mindset" with an elevated sense of emotional collaboration, belonging and purpose given that the pandemic has changed the way employees view why, where, and how they work. Two exciting tools have been deployed for improved employee engagement.

#### Championship Barometer

This is an enhancement of our digital 360 feedback tool to gauge where we are today against where we want to be for continuous progression. This is an internally built digital tool, building on our organisation's leadership values, with the aim of increasing alignment to our Championship vision and bringing employees closer together.

#### Return On Experience (ROX) Tool

edotco is in the midst of engineering distinct employee experiences across the employee lifecycle via our in-house Returns on Experience tool. As we shift away from a once-a-year employee engagement model with lagging indicators to one which is real time and predictive, we look to enable a more connected and responsive organisation.

The ROX tool focuses on driving the organisation's value through 5 pillars i.e. Skills, Process, Behavior, Policy and Surprise element, all of which closely link to a branded experience across various employee touchpoints.

“Individual wins Medals,  
Collaboration wins  
Championship.  
This is the mindset and  
culture in becoming  
a Global Top 5 Tower  
Company.”



*Ramon Chelvarajasingam*  
Chief People Officer, edotco Group



## Bionic Workforce

### COVID-19 Relief Programme

From the 2021 Annual Employee Engagement Survey with Covid related questions:

**My team is able to meet our work challenges effectively despite the COVID pandemic.**

(We scored 97% overall group wide, 7% better than Telecommunication Norms and 5% better than High Performing Companies)

**I am well supported during this time.**

(we scored 94% overall group wide, 5% better than Telecommunication Norms and 4% better than High Performing companies)

**The coronavirus-related support/relief (e.g., care packages, support allowances, vaccine-related reimbursements) provided by this organisation have been sufficient.**

(We scored 82% overall across Group. No current independent benchmark to this question)



## Bionic Workforce

Unrecorded days off granted to employees going for COVID-19 vaccination:

- One day off for the vaccination
- Up-to two days off after the vaccination if they feel unwell and need to rest

“Rest, Recharge, Rejuvenate” initiative (the 3R Day) introduced to allow employees to enjoy a longer break over the weekend and public holiday to balance their professional and personal lives, with the objective to ensure we maintain our high productivity levels whilst protecting our physical and mental well-being, especially during the extended and partial COVID pandemic lockdown periods.

Weekly team rotation working in office/from home in phases from pandemic period till endemic in accordance with guidelines from the Ministry of Health to balance the well-being of employees and business and operational needs.

Continuous communication from time to time to employees to keep them informed of COVID situation amongst the infected colleagues and their family members as well as the working arrangement.

Supported our Myanmar operations with medical supplies and equipment despite supply access challenges arising from political unrest in the country.

Portion of salary payment in cash to assist Myanmar employees facing cash shortages in the country.

Launched MYMedic @ Wilayah Vaccine Mobile Truck Program, an initiative in collaboration with the Federal Territory Ministry, to expedite the vaccination amongst employees in Klang Valley for their protection and well-being during this COVID-19 pandemic.

Progress update on vaccination status of employees across our Group to Management to monitor the well-being of employees during the pandemic.

COVID HR Helpdesk 24X7 hotline in supporting employees with covid-related queries.

Constant series of engagement initiatives/events and check-ins amongst employees (virtual, semi-virtual during pandemic as well as in the office during endemic phase) to upkeep the level of engagement and motivation amongst employees during the difficult times.

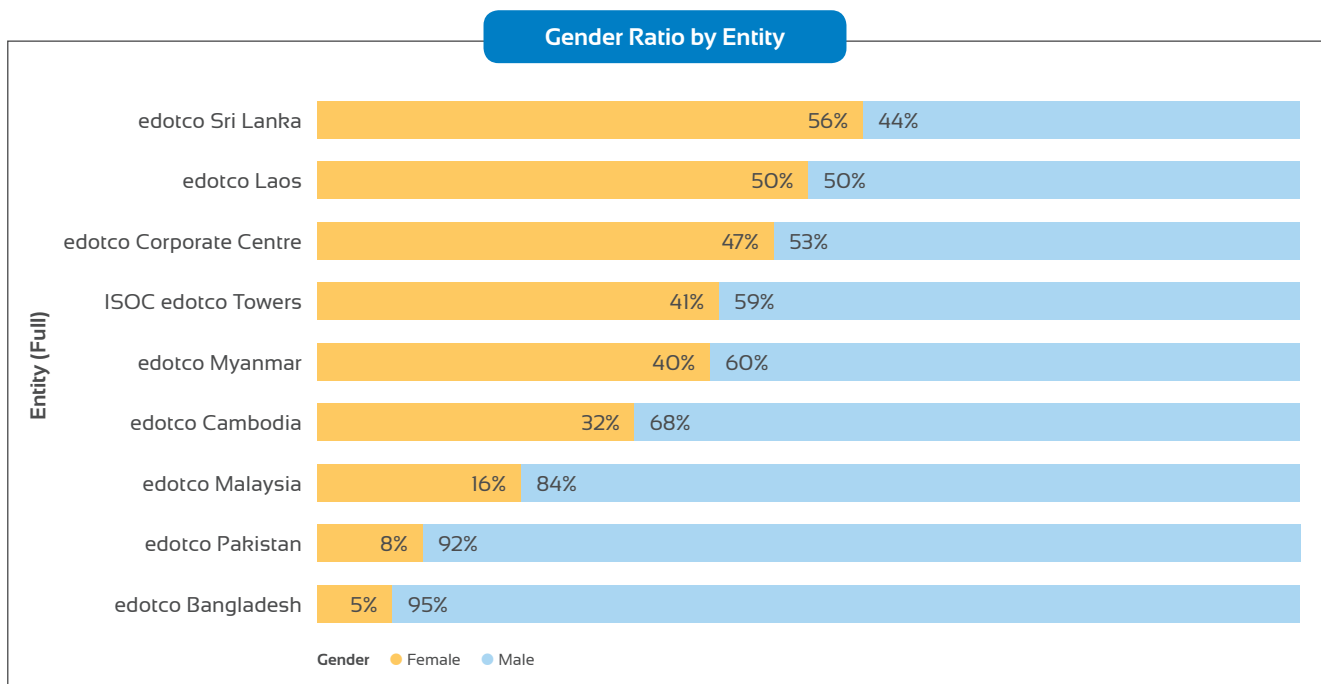
Setting up helpline and webinar in collaboration with NALURI with qualified psychologists and counsellors to support employees having mental health due to pandemic.

## Bionic Workforce


### Diversity, Equity and Inclusion

#### Gender Diversity

At edotco, we place great importance and see the value of ensuring that our workforce portrays a high level of diversity, equity and inclusion. For now, a balanced gender representation is seen at the Board level but we still fall short at an overall organisational level. Salary differences are also being closely tracked to ensure that we are on track towards our DEI goals.



Data is for Full Time Employees only.

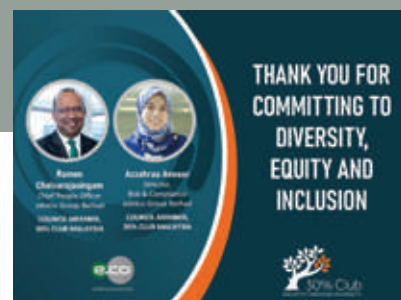


**edotco is a proud member of the 30% Club in Malaysia.**

The 30% Club is a global movement founded in the UK, aiming to place women in 30% of leadership positions at all levels of the organisation.

The Malaysia Chapter was launched in May 2015 to facilitate 30% women representation on the boards of public-listed companies.

This is intended to be a catalyst for the long-term objective of achieving a corporate culture in Malaysia where the appointment process is impartial of gender.





## Bionic Workforce

### Gender Diversity Statistics

Female Representation	
Board of Directors	44%
Leadership Positions of Director and above	23%
Middle Management	20%
Executives	23%
Overall Female Representation in edotco	21%

### Our Goal

30% female participation in Middle Management and Executives by 2030

### Ensuring Equal Opportunity

#### Widening diverse career opportunities

- » Creating redundancies in Mission Critical Positions by identifying diverse all-inclusive internal successors and external talents, reviewed regularly at our Talent Council forum
- » Blind Recruitment initiative in progress to use digital tools to filter candidates CV's based on skills; where hiring managers are only provided with information relevant to the role - age, gender, ethnicity, academic background are redacted from the application
- » Augmenting the current workforce with a gig-like workforce for seasonal peaks/temporary gaps, extending fair hiring practices to external talent pools
- » Continuous enhancement of our performance management and career development programmes to ensure equal opportunities across the workforce
- » Frequent reviews of our compensation plans to ensure fair compensation and to minimise any gender pay gap

#### Fostering an inclusive and ownership mindset

- » Employees are actively involved in the development of key culture concepts in the Company, including our core values and principles
- » Ideas and challenges are crowdsourced from the employees to encourage early buy-in and commitment
- » Employees are encouraged to join various Employee Resource Groups (ERGs) that represent diverse interests and goals
- » Employees are granted stock ownership plans to embed an intrapreneurial approach to the growth of the Company

“Employee wellbeing is critical to the achievement of our business goals. As we work towards embedding Diversity, Inclusion & Equity (DEI), an essential ingredient for DEI, is the employees' sense of **Belonging at the Workplace**. We will continue to ensure that this is cultivated in our journey towards becoming a Top 5 Global Telco.”



**Devan Kumar**  
Director of Human Resources  
Corporate Centre and Malaysia

## Bionic Workforce

### Diversity, Equity and Inclusion



*Myo Than*  
Director of Human Resources,  
edotco Myanmar

“As part of Diversity, Equity and Inclusion (DEI) Council, I am honoured to be able to contribute towards a culture of inclusion across our footprint.”

#### Ensuring Fair Wage

All employees are paid above the minimum living wage in their respective countries, with 5 out of 8 countries paying more than double the minimum wage of the country.

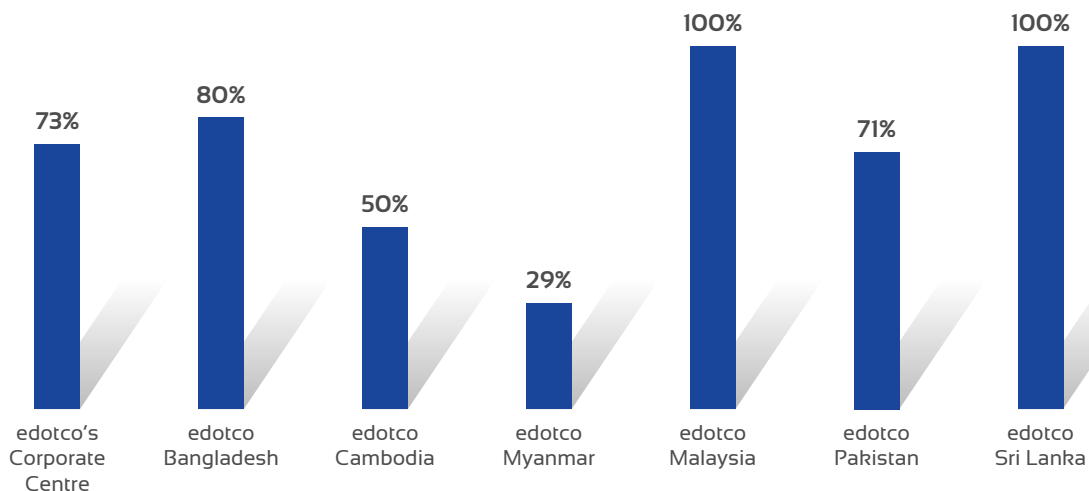
Indicators for Wage Ratio	Country Minimum/ Benchmark	2021	Current Difference
edotco Sri Lanka	50	371.45	7.4x
edotco Pakistan	94.9	274.9	2.9x
edotco Bangladesh	96.6	268.68	2.8x
edotco's Corporate Centre	297.4	744	2.5x
edotco Malaysia	297.4	652.8	2.2x
edotco Myanmar	103.49	169	1.6x
edotco Cambodia	190	300	1.6x
edotco Philippines	330	380	1.14x

#### Our Goal

Employee pay ranges will be maintained within the 50<sup>th</sup> percentile above market for their level.

#### Prioritising Local Community Hiring

Proportion of Senior Management Hired from the Local Talent by each NTC



## Bionic Workforce

### Ensuring Fair Entry Level Wage

Entry-level wage at edotco is at ratios of approximately 1.2 female:1 male for edotco groupwide, and 1.5 female: 1 male in Bangladesh only. This is mainly due to the fact that women in edotco are hired into relatively more senior and managerial positions in the Company. There is a common pay scale for women and men, with compensation commensurate with skillsets and experience.

Country	Currency	Min Wage	% Difference
Bangladesh	BDT	8,100	176
Cambodia	USD	192	67
Indonesia	IDR	4,420,000	n/A
Malaysia	MYR	1,500.00	81
Myanmar	MMK	144,000	204
Pakistan	PKR	25,000	54
Philippines	PHP	17,100	17
Sri Lanka	LKR	10,000	605

### Ensuring Fair Economic Distribution

#### Compensation of Employees

2020  
RM286.0 million

2021  
RM300.0 million

Total compensation to employees, which includes:

- » Wages and salaries, overtime payments commissions, bonuses & payments
- » Working and non-working directors' fees
- » Benefits in kind
- » Employer's contribution to Provident Funds
- » Pension funds and insurance premiums for employees

### Ensuring Fair Treatment of Employees

Zero incidents of discrimination

Between 6 to 8 weeks notice period provided to employees and their representatives prior to the implementation of significant operational changes that could substantially affect them

List of Benefits for edotco Employees:

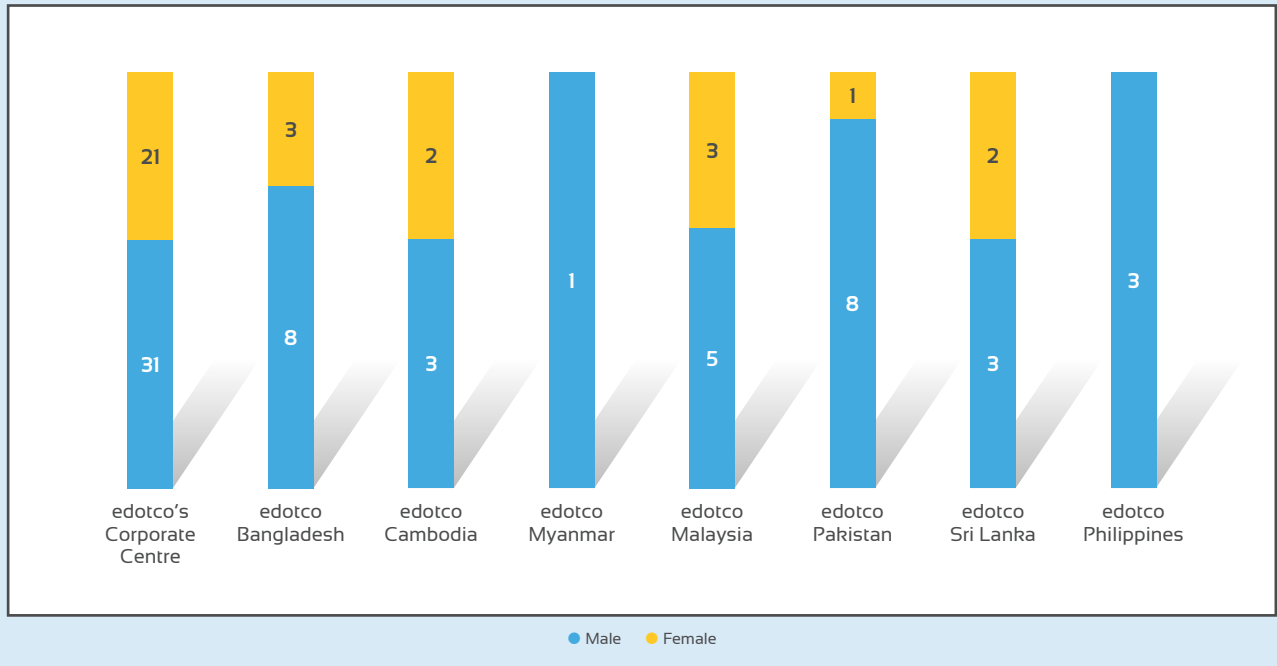
- » Life insurance
- » Health screening
- » Disability and invalidity coverage
- » Parental leave
- » Dental and optical care
- » Maternity benefit
- » Personal enrichment
- » Stock ownership
- » Volunteer leave
- » Retirement provision
- » Long-term incentives
- » Reimbursement for COVID-19 swab tests

## Bionic Workforce

### Diversity, Equity and Inclusion

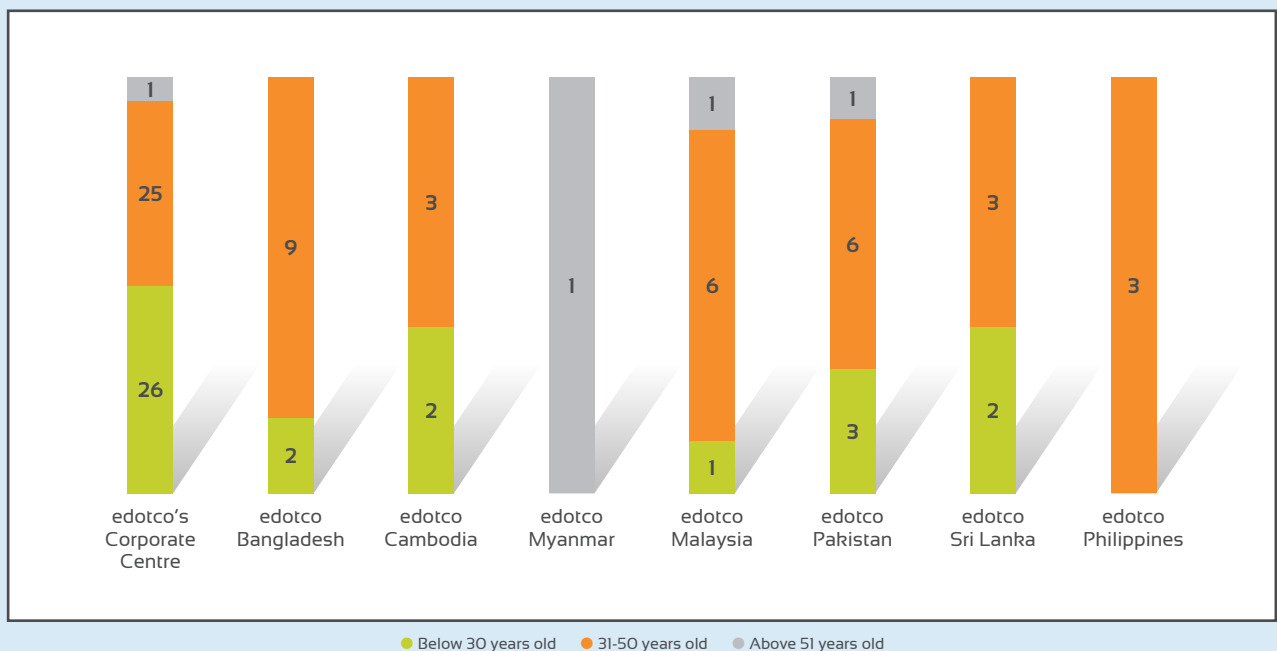
#### Employee Turnover by Gender

(height equalised to 100%)



#### Employee Turnover by Age

(height equalised to 100%)

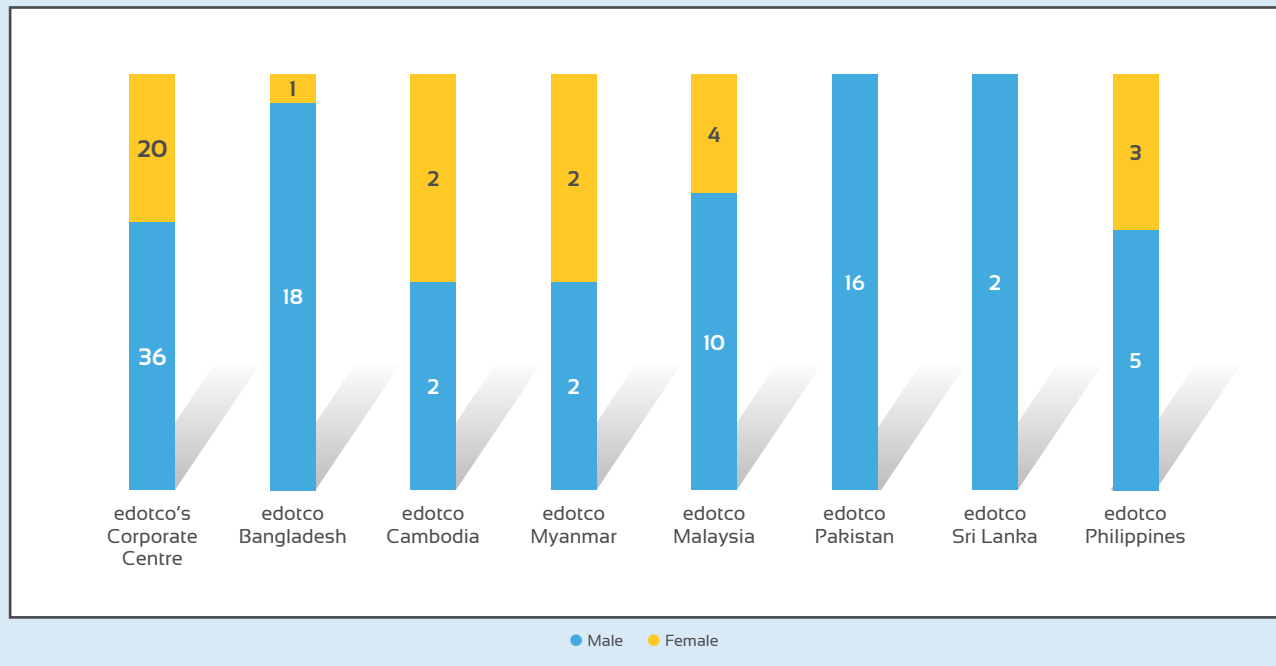




## Bionic Workforce

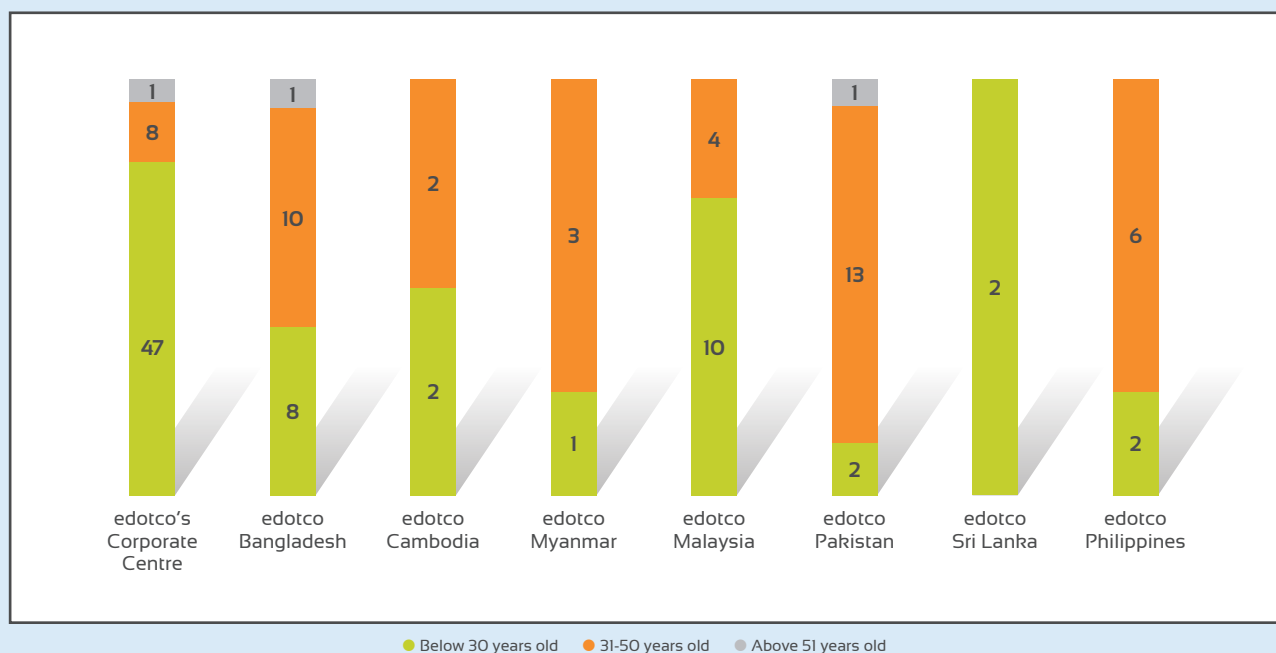
### New Employee Hires by Gender

(height equalised to 100%)



### New Employee Hires by Age

(height equalised to 100%)

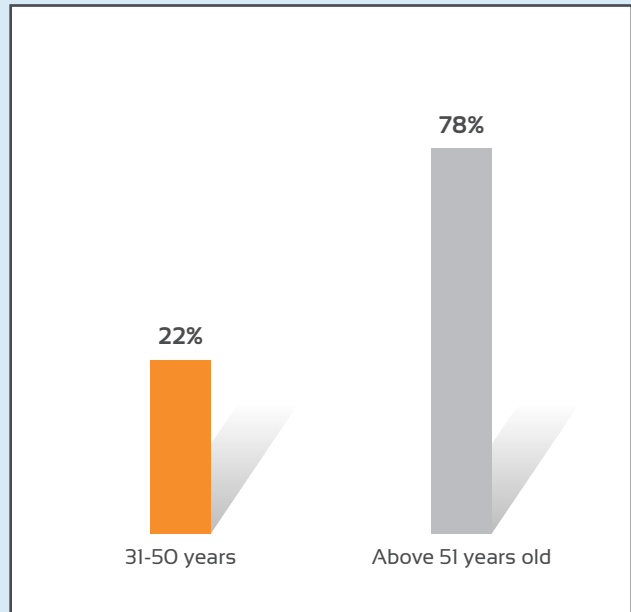
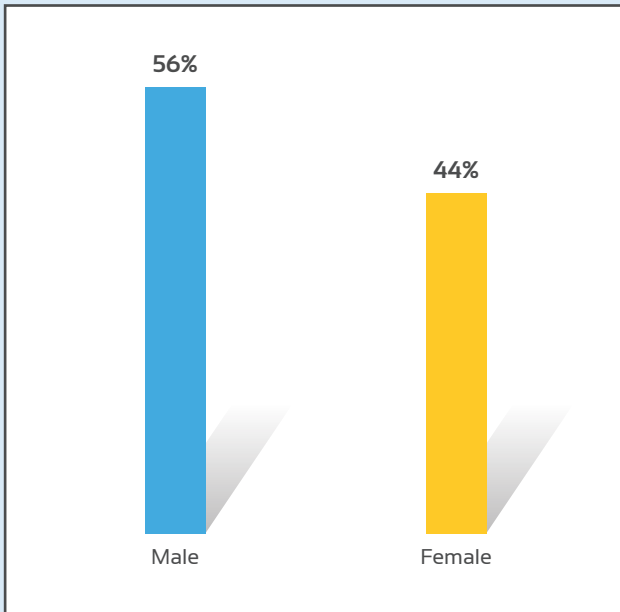


## Bionic Workforce

### Diversity, Equity and Inclusion

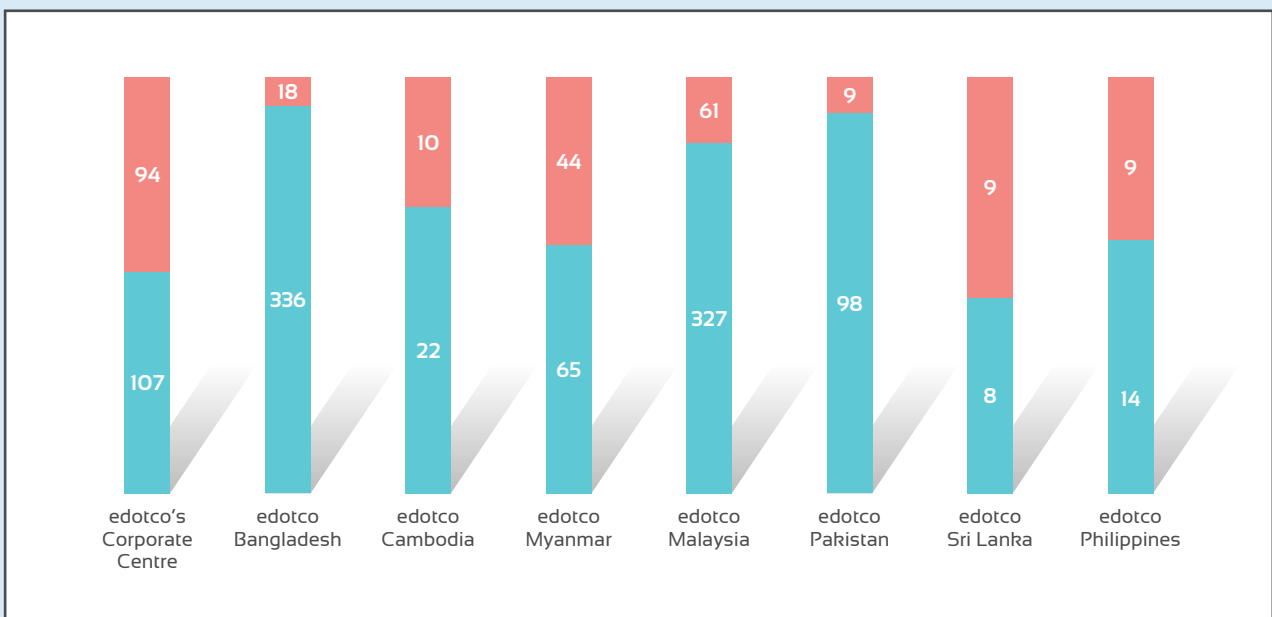
#### Diversity of the edotco Board of Directors

(Gender and Age)



#### Total Full Time Employment by Gender

(height equalised to 100%)



● Full Time Male ● Full Time Female

# Prioritising Health and Safety

## Occupational Health and Safety

### Continuously Enhancing a Safe Working Environment

In an effort to consistently pursue a safer work environment, edotco has established additional guidelines in our OHS policy, including that:

- » All NTCs are reviewed on a yearly basis on their specific local safety regulation and edotco’s Legal Register
- » All NTCs are mandated to have their own OHS Committee with members consisting of management and workers, with meetings held quarterly to discuss occupational health and safety issues at every level of edotco’s daily operations, propose action plan to mitigate and ensure implementation effectiveness
- » All NTCs’ Chairperson of the OHS Committee is the Country Managing Director
- » All NTCs will ensure that for every 40 workers, there are 2 representatives each from management and worker pools

#### Technology to Reduce OHS Risks

Use of advanced technology such as echo remote monitoring and management system that optimises operational processes and reduces on-site manpower helps to reduce OHS risks in the organisation. Additionally, edotco employs drones for routine maintenance inspection and site audits. Technicians are no longer required to be on-site or to climb towers to conduct manual equipment inspection. These steps significantly minimise worksite risks.



*“No work is so urgent that we cannot do it safely”*

#### ISO 45001 Occupational Health & Safety (OH&S) Management Systems Certification



Malaysia



Myanmar



Bangladesh



Pakistan



We are committed to ensure that everyone’s health & safety is top priority at edotco. It’s everyone’s responsibility to put safety first. No work is so urgent that we cannot do it safely.



**Fadhlie Muhammad Sutan Mudo**  
Senior Specialist, Occupational, Health & Safety

## Prioritising Health and Safety

### Occupational Health and Safety

In efforts to enhance edotco’s occupational health and safety, we endeavour to continue to be vigilant in managing our risks by strengthening OHS culture, enhancing governance and leveraging on digital technologies.

A strong awareness and extensive training for all employees and vendors were taken to safeguard the health & safety across all areas of operation by managing and reducing the risk of exposure and transmission.

With the existing of edotco OHS Management System, we have a clear overview of every OHS-related activity, recordings, and mitigation plans. Extensive and continued training was carried out and not limited to the compulsory subjects as per below:

List of Compulsory Trainings	
1. Basic OHS Induction for New Joiner	9. Fire Protection System
2. Risk Management	10. Electrical Safety
3. First Aid	11. Ergonomic Awareness
4. Emergency Preparedness & Response	12. Radio Frequency Safety
5. OHS Awareness Refresher	13. Personal Protective Equipment
6. Incident Investigation	14. ISO 45001 Awareness & Refresher
7. Working at Height	15. ISO 45001 Internal Auditor
8. Safety Induction for Site Workers	16. ISO 45001 Lead Auditor

### Extensive Training and International Certifications for Increased Diligence

To increase the awareness of OHS at all times, extensive training was carried out at all levels as below.

Indicators	2021
<b>Leading Indicator</b>	
Number of Trainings Held	105
Number of OHS Meetings Held	154
Number of Site Inspection Conducted	14,187
ISO 45001 Certificate - Surveillance Audit for MY, OSS, MM, BD & PK	5
Number of Vendors Evaluation Conducted	88





GRI 403-9, GRI 403-10

## Prioritising Health and Safety



### Continuous Identification and Elimination of Hazards and Minimising Risks

Joint Workplace Inspection periodically conducted, led by Committee Chairman

Ongoing OHS Internal Audit process

Tracking presented quarterly at OHS Performance section in Management Committee Meeting

Hazard Identification, Risk Analysis and Risk Control (HIRARC) document reviewed annually

edotco's OHS management encompasses internal staff, visitors, vendors, suppliers, authority and public personnel

Zero work-related ill health cases due to internal negligence

### Our Goal

Zero injury incidents involving employees and business partners

Scan here to view the video



A strong OHS management system in business is linked to improved performance and profitability. We ensure OHS compliance during every business activity we perform and at every level of our organisational structure that exemplifies edotco's commitment to its employees, supply chain, community, and customers.



**Ahsan Khan**  
Specialist of Health & Safety,  
edotco Pakistan











# Towards an Uplifted Community

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## Connecting the Unconnected and Underconnected

Digital connectivity is imperative today in all parts of the world towards eradicating poverty, reducing inequity and revolutionising quality of life. In line with this, the United Nations is making a case that digital connectivity should be a human right<sup>1</sup>.

In fact, an estimated 37% of the world's population - or 2.9 billion people - have still never used the Internet<sup>2</sup>.

edotco has made significant push to connect unserved rural areas in keeping with our mission statement enabling connectivity for the future.

edotco supports Public-Private Partnerships to improve rural connectivity.



### Country Specific Strides and Commitments in Providing Connectivity to Rural Areas



Malaysia

- **Jendela** - has helped achieve 96% 4G coverage in Oct 2021
- Targets 100% 4G coverage by end 2023



Indonesia

- **Badan Aksesibilitas Telekomunikasi dan Informasi (BAKTI)** - to build 7,904 4G sites in rural areas by end 2022
- XL and Telkomsel selected as Badan Aksesibilitas Telekomunikasi dan Informasi (BAKTI) partners
- Funded by Universal Service Obligation (USO) fund and other government funds



Sri Lanka

- **Telecommunications Regulatory Commission of Sri Lanka (TRCSL) launched "Gamata Sanniwedanaya" programme** to improve 4G coverage in rural areas
- Targets 100% 4G population coverage
- Partnering with SL Telekom, Dialog and Airtel



Pakistan

- **Universal Service Fund (USF)** established by the Pakistan government to promote connectivity to unserved and underserved areas
- Consists of 1.5% contribution by Telco Operator, no government funding involved
- To date, 1,699 towers deployed and provided 490,000 broadband connections



Philippines

- **Department of Information and Communications Technology-United Nations Development Programmes (DICT-UNDP) Free Wifi For All** - aims to connect approximately 6,000 sites in remote, vulnerable and off-grid community by Dec 2022 (as part of total target sites of 120,000)
- The programme is fully funded by the Philippines government

Sources:

<sup>1</sup> The Case for Connectivity, The New Human Right, United Nations, 2020




<sup>2</sup> Measuring Digital Development, ITU Publications, 2021



# Empowering The Community

edotco's Corporate Social Responsibility focus will be on the empowerment of surrounding communities

<b>AIM</b>	Continuously support and improve the quality of life of the communities living near our tower sites across all NTCs	<b>FOCUS</b>	Provision of electricity, clean water and disaster relief for communities living near our tower sites
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 <b>TOWER2POWER</b>	 <b>TOWER2WATER</b>	 <b>TOWER2COMMUNITY</b>
<p><b>Mechanism:</b> Providing electricity to homes, schools and clinics from edotco's renewable sites</p> <p><b>Benefitted:</b> Approximately 24,000 lives since 2016</p>	<p><b>Mechanism:</b> Providing clean water via Reverse Osmosis (RO) systems for the community and WASH awareness programme (water, sanitation and hygiene)</p> <p><b>Benefitted:</b> Approximately 15,000 lives since 2018</p>	<p><b>Mechanism:</b> Providing disaster relief according to local needs and Wakalah Zakat for Malaysia</p> <p><b>Benefitted:</b> Approximately 50,000 lives since 2016</p>
<p><b>Goal 2022:</b> Collectively benefit 5,200 lives</p>	<p><b>Goal 2022:</b> Collectively benefit 4,400 lives</p>	<p><b>Goal 2022:</b> Needs-based</p>

👍 It gives employees a platform to volunteer and make a positive impact. Together we impacted approximately 90,000 lives across the region. 💬

  
*Sharifah Nurafya Syed Danial*  
 Specialist of Sustainability & CSR, edotco Group



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edotco's CSR focuses on the empowerment of surrounding communities which are aligned to edotco's Sustainability Framework on Page 16

## Empowering The Community



TOWER2POWER

### BANGLADESH: Streetlamps at the vicinity of two of edotco's towers

**Benefitted: 2,800 lives across 700 families since inception**

Solar streetlamps were provided in 2021 for communities from underprivileged communities from Ramu and Kutubdia streets to enable access to sustainable lighting.

**Our Goal**  
BANGLADESH 2022:  
Streetlamps at the vicinity  
of 2 of edotco towers  
Number of beneficiaries:  
500 families

### SRI LANKA: Lamp poles for streetlights and security to community

**Benefitted: 1,600 lives across 400 homes since inception**

Streetlights were provided to communities in Dematagoda Housing Scheme, Agalawatta North and Meesalai South. The existence of these street poles have been seen to improve community security in the vicinity.

**Our Goal**  
SRI LANKA 2022:  
Lamp poles for streetlights  
and security to community  
Number of beneficiaries:  
150 families

### PAKISTAN: Power for homes

**Benefitted: 250 lives across 26 families since inception**

Lighting was provided to under privileged communities in Umerkot & Buner.

**Our Goal**  
PAKISTAN 2022:  
Power for homes  
Number of beneficiaries:  
150 families

GRI 413-1

“This Company actually goes the extra mile to help the communities it serves which eventually, when you look at the larger picture is taking care of humanity at large in the long-haul. In an industry like telecommunication which money matters and the bottom line is what we often love to talk about, it really touches my heart to see the Company leadership care about impoverished sectors of our local communities and how they strive to take an effort to steer to sustainable solutions is inspiring and keeps motivation levels going.”



**Dimanthi Jayathilaka**  
Head of Corporate Affairs,  
edotco Sri Lanka



TOWER2WATER



## BANGLADESH: Water Treatment Plant

**Benefitted: 2,196 lives across Habibpu, Nurnagar village**

Safe drinking water was provided to the distressed community in the coastal area where the drinking water is scarce due to salinity. edotco Bangladesh established a Reverse Osmosis Water Treatment Plant in partnership with Bangladesh Rehabilitation Assistance Committee (BRAC) in the area. A grant was issued to BRAC to execute their regular programme for water, sanitation and hygiene.

### Our Goal

**BANGLADESH:  
Expansion of current programme**

Number of beneficiaries:  
500 families  
Number of litres:  
8,000 litres/day

**PAKISTAN:  
Manual water handpumps**

Number of beneficiaries:  
100 families

**CAMBODIA:  
Provision of water programme - RO Water**

Number of beneficiaries:  
300 families  
Number of litres:  
5,000 litres capacity of water tank/day

**SRI LANKA:  
Provision of clean water and  
refurbishment of public toilet facilities  
at Yativana, Kalutara District**

Number of beneficiaries:  
100 families  
Number of litres:  
100 litres/sanitation facility

## Empowering The Community



### TOWER2COMMUNITY



### MALAYSIA: LIFE Project

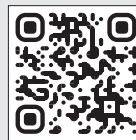
edotco together with Global Peace Mission (GPM) in Malaysia launched the 'Love Initiative for Earth', or LIFE project, to preserve the ecosystem and foster environmental sustainability. This project covers five states in Malaysia and targets the collection of 50 tonnes of recyclable waste for a sustainable future.

During the launch as many as 120 parcels of recyclable waste materials were collected by the villagers of Kampung Sungai Kajang in Tanjung Karang, Selangor, amounting to 26,820 kg of waste collected and benefitting 1,084 lives. At the launch, we also planted 20 Bucida trees at one of the sites of the earliest palm sugar processing factories in Malaysia.

Starting with awareness, the project focuses on driving home the importance of a sustainable environment. The project then progresses to activate recycling programmes in which food supplies are exchanged for the community's recycling efforts, encouraging recycling while providing basic food staples to the community.

This programme has been implemented in Selangor, Perak, Pahang, Sabah and Wilayah Persekutuan.

Scan here  
to view  
more videos



### MALAYSIA: Laptops for Students

With the goal of enabling students to achieve their academic goals, edotco provided ICT and IT-related equipment to students in need. This was implemented across 6 learning centres at Projek Perumahan Rakyat (PPR) in Malaysia which benefitted approximately 1,600 Malaysian families.

### BANGLADESH: ICT School Programme

edotco Bangladesh implemented a multimedia classroom setup in two schools dedicated for underprivileged children. The contribution consisted of two digitally equipped classrooms for Jaago Foundation School at Teknaf and Rangpur District. This programme benefitted approximately 1,200 underprivileged students.



GRI 413-1

## Empowering The Community



### MALAYSIA: Wakalah Zakat

Zakat is a form of almsgiving of obligatory importance in Islam. A distribution mechanism through the Wakalah Zakat method has been implemented at several Zakat institutions in Malaysia. Wakalah Zakat is a collaboration initiative between the Zakat institution and the Zakat payer.

Since 2020, edotco Malaysia has participated in the Wakalah Zakat programme, in which edotco Malaysia was entrusted to administer Zakat distribution to the needy Asnaf (eligible recipient), on behalf of the Majlis Agama Islam Wilayah Persekutuan (MAIWP). The overhead costs of the programme will be borne by edotco Malaysia and the disbursement is carried out for funds received from MAIWP.

### Wakalah Zakat Approval Process



## Empowering The Community



### TOWER2COMMUNITY

## Employee Volunteerism

edotco group continues to encourage employees to volunteer for our Corporate Social Responsibility (CSR) activities through our Employee Voluntary Engagement (EVE) programme. These include humanitarian relief, provision of necessities and infrastructure projects for underprivileged communities.

### Provision of Necessities to Underprivileged Communities

#### MALAYSIA

- Back to School campaign provided basic school items to students from underprivileged families

#### PAKISTAN

- Clothes donation drive in collaboration with Akhuwat foundation (Lahore, Karachi, Islamabad)
- Food provision to 450 underprivileged people for 30 days under the edotco food bank. In addition, 3 unprivileged families were given food rations for one month under edotco family adoption

#### MYANMAR

- Used laptops donations to 20 students in various vocational educational courses throughout Myanmar

### Humanitarian Relief

#### MALAYSIA

- Sarawak flood aid and COVID-19 relief consisted of a contribution of food and essentials parcels benefitting 150 families
- Contribution of 500 sets of PPE to Klinik Kesihatan Gombak in collaboration with Immarket for COVID-19 volunteers
- Contribution of food and essentials parcels for 1,000 families in COVID-19 relief efforts
- Contribution of food and essentials parcels in Kedah for flood aid and COVID-19 relief

#### BANGLADESH

- Provision of cooked meals to approximately 3,500 children in Dhaka, Narayanganj, Rangpur, and Rajshahi District as part of edotco Bangladesh's CSR initiative to help COVID-19 affected communities

#### MALAYSIA and edotco Headquarters

- Employee volunteers helped clean houses affected in the December flood
- Rebuilt orang asli homes for 5 families whose homes were swept away by floods

Scan here to view more videos



“It is satisfying for me on a personal level to be able to help the community surrounding our towers as it is an opportunity for me to grow as a person.”



**Shasha Athira**  
Senior Executive of  
Corporate Social Responsibility,  
edotco Malaysia

GRI 413-1

## Empowering The Community



### Aid for Special Needs Communities

#### edotco HEADQUARTERS

- Provision of groceries for 300 people from the blind community in the Malaysian Association for the Blind (MAB)
- Braille Al-Quran was conducted for 300 people together with contributions from edotco and from employees
- Movember event collected funds from employees through hair cutting activities and contributed to the National Cancer Society Malaysia (NCSM)
- Provision of wheelchairs and vaccinations at Axiata Arena where wheelchairs were provided to the differently abled community and senior citizens vaccinated at Axiata Arena, serving an average of 4,000 people per day



#### MALAYSIA

- The Home-to-Home Vaccination Programme benefitted 800 underprivileged in the community with Yayasan Bunda Siti Banun (YBSB) and National Cancer Society Malaysia (NCSM)

### Others

#### MYANMAR

The annual festival of Khu Tho provided funds to 5 charity homes in collaboration with employees that benefitted more than 700 people.

### Festival-Related Programmes

In Malaysia, with festivities celebrating the different occasions of Ramadan/Syawal, Chinese New Year, Deepavali and Christmas, 1,500 families benefitted from food contributions and essential items parcels.



## Country Highlights



### COUNTRY: MALAYSIA



#### AT A GLANCE

17,506 towers owned and managed

>12,000 lives impacted in the community

>8,500 trees planted

589 employees

#### Sustainability Highlights

##### Environment

- Supported carbon neutral ambition by reducing emissions by 35.9% and deploying 37 renewable sites
- Sequestered carbon through tree planting efforts in Malaysia, to date have planted more than 8,500 trees
- Collaborated with the government to establish the the National Greenhouse Gas Monitoring Network

##### Social Labour

- Institutionalised gender diversity and inclusion into policies, practices and standards
- Institution of fair employment and welfare - gender inclusivity: 26 Female:74 Male ratio employment

##### Social CSR

- Tower2Community (T2C): more than 12,000 lives impacted to date
- Employee Volunteerism: more than 50% participation

##### Governance

- Employee Health, Safety and Wellbeing
- Certified with ISO 45001 Certification (OHS Management System) in 2020 and maintained standards in 2021
- Anti-bribery and corruption initiatives in place

#### Sustainability Challenges

On our Sustainability journey in Malaysia, we faced the following challenges:

- High site power requirement:** As technology evolved from 2G to 4G and 5G, the power demands are increasing, leading to higher investments and longer return-on-investments
- Limited land areas for solarisation:** As our new build site cost and design are optimised, the land area required for solar panel installations can be reduced. However, with higher power requirements, land requirement for solar installations will increase
- Reliable partners for green technology:** Unavailability of rental model partners for green technology is a barrier to the replacement of rental generators at sites

#### Forward-Looking Statements

##### Tower2Community

- Rebuild orang asli homes that were swept away by floods

##### Tower2Power and Tower2Water

- Provision of electricity and water to orang asli communities in Pahang
- Wakalah Zakat for 37 people
- B40 Asnaf (extreme poor) Entrepreneur Programme (NGO, ABIM) (Benefiting 27 people)
- Motorcycles for B40 Asnaf (extreme poor) to support generation of increased income via Food Panda/Grab Delivery services (Benefiting 10 people)

##### Waste Management

- To implement site waste management in our operations and with the community where collected recyclables will be matched to reforestation efforts

##### Green Branding

- Launch Employee Green Scorecard app to track employees' activities that contribute to carbon reduction



## Country Highlights

### edotco Malaysia in the Community

#### TOWER TO COMMUNITY (T2C)

##### *Disaster relief for communities living near our tower sites*

edotco supported communities in Malaysia for flood relief, supporting a total of 1,307 families throughout the year with essential food parcels. This targeted areas in Sarawak and Kedah with flood aid and COVID-19 relief through contributions of food and essential parcels. Through a partnership with the National Cancer Society Malaysia (NCSM), a mobile vaccination service was provided to 800 underprivileged and disabled individuals in Kedah.

#### EMPLOYEE VOLUNTEERISM

edotco continues to encourage employees to volunteer for our Corporate Social Responsibility (CSR) activities through our Employee Voluntary Engagement (EVE) programme. These range from festive related programmes to humanitarian relief, provision of necessities and infrastructure related projects to underprivileged communities.

##### *Provision of necessities to underprivileged communities*

Employees across edotco operating markets contributed to livelihood initiatives through donation drives. This enabled the provision of basic back-to-school items and food

##### *Laptops for students in need*

edotco provided ICT and IT-related equipment to students in need. This was implemented across 6 learning centres at Projek Perumahan Rakyat (PPR) in Malaysia which benefitted approximately 1,600 Malaysian families

##### *Aid for communities with people with disabilities*

edotco donated Braille al Qurans to schools for the blind in the month of Ramadan. In addition, 20 wheelchairs were donated to the vaccination centre at Axiata Arena for increased mobility of the disabled and elderly



#### INFRASTRUCTURE DESIGN COMPETITION

In October 2021, edotco Group organised an infrastructure design competition in collaboration with the University Community Transformation Centre of Universiti Kebangsaan Malaysia (UCTC-UKM), edotco's academia partner.

The first of its kind in Asia, the competition invited engineering students in their 3<sup>rd</sup>, 4<sup>th</sup> and postgraduate studies across universities based in Malaysia, Brunei, Cambodia, Indonesia, Laos, Myanmar, the Philippines, Singapore, Thailand, Vietnam, Bangladesh, Sri Lanka, Pakistan, Japan, Korea, and China. The programme was piloted in Bangladesh last year and expanded to additional regional universities thereafter.

Themed '**Infrastructure for tomorrow: designing the future**', the competition is edotco's programme to provide today's aspiring youths with a platform to engage with experienced leaders, gain industry knowledge and attain technological exposure in creating innovative solutions. Teams were required to design a tower and foundation that fit the next-generation of telecommunication infrastructure criteria based on the given technical framework, guided by a mentor from edotco over three months. The top five entries were assessed by a panel of experts in the field, and three winners were awarded with cash prizes.

The winners of this competition were from the following universities:

#### 1<sup>st</sup> place

American University Phnom Penh (AUPP), Cambodia

#### 2<sup>nd</sup> place

University of Engineering and Technology, Lahore, Pakistan

#### 3<sup>rd</sup> place

Chittagong University of Engineering and Technology, Bangladesh



Scan here to view more videos



## Country Highlights



### COUNTRY: BANGLADESH

#### AT A GLANCE

16,971 towers owned and managed

>28,000 lives impacted in the community

>7,000 trees planted

354 employees

#### Sustainability Highlights

##### Environment

- Supported carbon neutral ambition by reducing emissions per site by 57.6%, deploying 1,691 renewable sites, electrifying 99% of sites and achieving 84% lithium battery sites
- Greener structures achieved through 1 carbon fibre tower with 20% reduced carbon emissions per site, and 7 bamboo towers with 70% carbon reductions per site
- Sequestered carbon through tree planting activities, to date have planted more than 7,000 trees

##### Social Labour

- Implemented gender equality webinar awareness programme on the prevention of workplace harassment, covering all senior leaders in the organisation
- Institution of fair employment and welfare - gender inclusivity: 5 Female:95 Male ratio employment

##### Social CSR

- T2P, T2W and T2C programmes have resulted in more than 28,000 lives impacted

##### Governance

- Prioritised employee health, safety and well-being
- Certified with ISO 45001 Certification (OHS Management System), obtained in 2020 and maintained in 2021
- Anti-bribery and corruption initiatives in place

#### Sustainability Challenges

On our Sustainability journey in Bangladesh, we faced the following challenges:

- Numerous incidences of theft and damage to the equipment, oftentimes impacting the service we sought to provide to these communities
- Occasional lack of cooperation by local communities

#### Forward-Looking Statements

##### Tower2Power: Provision of electricity to homes, public community space

- Streetlamps at the vicinity of 2 edotco towers (Benefiting 500 families)
- Power backup to store vaccines in refrigerators (Benefiting 500 families)

##### Tower2Water: Provision of water and sanitation/hygiene programme for the community

- Water treatment plant (Benefiting: 500 families, providing 8,000 liters of water per day)

##### Tower2Community: Disaster relief

- Will be conducted as needed in collaboration with non-profits organisations

##### Climate Action Plan

- To deploy Low Cost Structure/Just Nice Tower (approximately 27% less structure tonnage, approximately 25% carbon emission reduction, approximately 30% decrease in steel usage)

##### Waste Management

- To implement site waste management
- To complete the implementation of Green Office Initiatives

### edotco Bangladesh in the Community

#### TOWER2WATER (T2W)

##### Benefitted 2,196 people across Habibpur, Nurnagar village

In 2021, edotco Bangladesh provided safe drinking water to a distressed community the coastal area of Nurnagar village where drinking water is scarce. edotco Bangladesh established a Reverse Osmosis Water Treatment Plant in partnership with the Bangladesh Rehabilitation Assistance Committee (BRAC).



#### TOWER2POWER (T2P)

##### Benefitted more than 2,800 people across 700 families

In addition, solar streetlamps were also provided to communities from underprivileged communities from Ramu and Kutubdia streets, enabling access to sustainable lighting.



#### TOWER2COMMUNITY (T2C)

##### Benefitted 3,500 children in Dhaka, Narayanganj, Rangpur, and Rajshahi Districts and 503 underprivileged students in Teknaf and Rangpur Districts

COVID-19 affected communities were aided by edotco Bangladesh with cooked meals to approximately 3,500 children in Dhaka, Narayanganj, Rangpur, and Rajshahi Districts

An ICT school programme was also implemented with multimedia classroom setups in two schools. edotco Bangladesh contributed digital classroom equipment for Jaago Foundation School at Teknaf and Rangpur Districts. This programme benefitted about 503 underprivileged students.



## Country Highlights

### edotco Bangladesh Employee Voluntary Engagement Programme Tree Planting 2018

With the aim of building a green future, edotco BD has planted a total of 340 trees under its Employee Voluntary Engagement Programme (EVE) in a resort at Gazipur Dhaka.

Driven by the aspiration 'Tree for future, tree for Sustainability', 45 employees across the company devotedly participated in this day long CSR initiative held on the 15th November 2018.

In a short briefing session, edotco officials spoke about the objective of this voluntary undertaking by edotco BD highlighted the significance of edotco's green innovation considering dissimilar environmental impact. The trees planted by the employees will be nurtured by the resort authority and BD CSR team will remain in touch for time to time monitoring.





## Country Highlights



### COUNTRY: PHILIPPINES

#### AT A GLANCE

25 towers  
owned and managed

>100 lives impacted  
in the community

23  
employees

#### Sustainability Highlights

##### Environmental

- 'Power off when not in use' initiative

##### Social Labour

- Gender inclusivity and equality in opportunity and compensation
- Accredited first aider and safety officer as stipulated in Department of Labour & Employment (DOLE) guidelines
- Flexible work arrangements to balance work hours and lengthy office commute
- Institution of fair employment and welfare - gender inclusivity: 39 Female:61 Male ratio employment

##### Social CSR

- Tower2Community: COVID disaster relief in 2020, impacted more than 100 lives

##### Governance

- Occupational Health & Safety Initiatives: 0 Incident
- Anti-bribery and corruption initiatives in place

#### Sustainability Challenges

On our Sustainability journey in the Philippines, we faced the following challenges:

- **Paper versus online:** automation initiatives are challenged with site landlords preferring cheque payments, government/municipal authorities requiring hardcopy documentation, etc. Efforts are being made to adopt online payment where possible
- **Time and commute:** delivery of physical documents resulting in lower productivity and increased carbon emission

#### Forward-Looking Statements

##### Tower2Community: Disaster Relief

- Will be conducted as needed in collaboration with non-profit organisations

##### Tree planting

- Committed to planting 100 trees in 2022

##### Waste Management

- To implement site waste management
- To introduce recycling programme and e-waste collection in 2023

##### Green Initiatives

- Addition of office plants





# Country Highlights



## COUNTRY: PAKISTAN

### AT A GLANCE

1,907 towers owned and managed

>450 lives impacted in the community

>10,000 trees planted

107 employees

### Sustainability Highlights

#### Environment

- Supported carbon neutral ambition by reducing emissions by 39.9%, deploying 114 solar sites, electrifying 71% of sites and achieving 74% lithium battery sites
- Sequestered carbon through tree planting activities, to date have planted more than 10,000 trees

#### Social Labour

- Supported Group's Diversity, Equity, and Inclusivity (DEI) Council to prioritise and discuss diversity-related matters with greater emphasis on hiring of women
- Institution of fair employment and welfare - gender inclusivity: 8 Female:92 Male ratio employment

#### Social Community

- Tower2Power and Tower2Community
- Clothes Donation Drive
- Edotco Food Bank & Family Adoption
- Tree planting

#### Governance

- Employee Health, Safety, and Well-being
- Certified with ISO 45001 Certification (Occupational Health & Safety Management System). Obtained in 2021
- Anti-bribery and corruption initiatives in place

### Sustainability Challenges

On our Sustainability journey in Pakistan, we faced the following challenges:

- Our current limitation of CSR activities around edotco tower sites reduces the scope of the project
- Due to budgetary limitations, activities are restricted

### Forward-Looking Statements

#### Tower2Power: Provision of electricity to homes, public community space

- Power for homes Benefitted: 250 lives across 26 families since inception
- Lighting was provided to under privileged communities in Umerkot & Buner

#### Tower2Water: Provision of water and sanitation/ hygiene programme for the community

- Manual water handpumps (Benefitting 200 families)

#### Tower2Community – Disaster Relief

- Will be conducted as needed in collaboration with non-profit organisations

#### Waste Management

- To implement site waste management
- To complete the implementation of Green Office Initiatives



## Country Highlights



### COUNTRY: MYANMAR

#### AT A GLANCE

3,076 towers owned and managed

>3,500 lives impacted in the community

109 employees

#### Sustainability Highlights

##### Environment

- Supported carbon neutral ambition by reducing emissions by 55.5%, deployed 386 renewable sites
- Greener structures achieved through 16 carbon fibre towers with 20% reduced carbon emissions per site, and 24 bamboo towers with 70% carbon reductions per site
- Sequestered carbon through tree planting activities, to date have planted more than 2,200 trees
- Participated in the campaign to recycle used oil for Earth Day Celebration (2000 litre = 10 drums)

##### Social Labour

- Institution of fair employment and welfare - gender inclusivity: 40 Female:60 Male ratio employment
- COVID-19 medical supplies & private vaccination for our employees

##### Social CSR

- Tower2Community (T2C): more than 3,500 lives impacted to date
- Employee Volunteerism: 100% employees volunteered to plant trees<sup>1</sup>
- Employee Volunteerism: "Tidying Up Our Home" Project

##### Governance

- Completed 99% of COVID-19 vaccination and 52% of booster shot
- Anti-bribery and corruption initiatives in place

#### Sustainability Challenges

On our Sustainability journey in Myanmar, we faced the following challenges:

- Political unrest in Myanmar
- Access restricted to some regions due to war zones
- Curfew in restricted areas
- Projects are delayed due to the political unrest and foreign exchange issues

#### Forward-Looking Statements

##### Tower2Community

- Planning Humanitarian Relief programme involving the provision on funds to 5 charity homes in collaboration with the employees. This is targeted to benefit more than 700 lives

##### Waste Management

- To implement site waste management.
- To introduce recycling programme and e-waste collection
- To complete the implementation of Green Office Initiatives



Note:

<sup>1</sup> Prior to political unrest



# Country Highlights



## COUNTRY: CAMBODIA

### AT A GLANCE

4,239 towers owned and managed

>1,300 lives impacted in the community

>1,500 trees planted

32 employees

### Sustainability Highlights

#### Environment

- Average emissions reduction percentage per built sites for Cambodia is 77.3%
- Deployed 1 carbon fibre site with carbon reduction of 20%.
- Sequestered carbon through tree planting activities, to date have planted more than 1,500 trees
- Donated 103 kg of used cooking oil in conjunction with Earth Day 2022 to Senton Green Recycling Cambodia

#### Social Labour

- Institution of fair employment and welfare - gender inclusivity: 31 Female:69 Male ratio employment

#### Social CSR

- COVID-19 posed challenges in running CSR programmes in 2021; however, efforts were successful to get 100% of the employees to volunteer for a tree planting activity with the community

#### Governance

- On track to obtain ISO 45001 Certification (Occupational Health & Safety Management System) in 2022
- Anti-bribery and corruption initiatives in place

### Sustainability Challenges

On our Sustainability journey in Cambodia, we faced the following challenges:

- Understanding the ESG framework and providing relevant training to all stakeholders
- Improving upon diversity and inclusion programmes
- Overcoming COVID-19 challenges and associated restrictions

### Forward-Looking Statements

#### Tower2Water: Provision of water and sanitation/ hygiene programme for the community

- Provision of RO water programme (Benefitting 300 families, providing 5,000 liters/day)

#### Tower2Community: Disaster relief

- Will be conducted as needed in collaboration with non-profit organisations

#### Climate Action Plan

- Deployment of Low Cost Structure/ Just Nice Tower (approximately 20% less structure tonnage, approximately 25% carbon emission reduction, approximately 30% decrease in steel usage)
- Research and development collaboration

#### Waste Management

- To implement site waste management
- To introduce recycling programme and e-waste collection
- To complete the implementation of Green Office Initiatives
- To obtain ISO 45001 Certification (Occupational Health & Safety Management System) in 2022



## Country Highlights



### COUNTRY: SRI LANKA

#### AT A GLANCE

1,244 multi-purpose lamp poles owned and managed

>1,600 lives impacted in the community

>1,500 trees planted

17 employees

#### Sustainability Highlights

##### Environment

- Sequestered carbon through tree planting activities, to date have planted more than 1,500 trees

##### Social Labour

- Gender Diversity: 50:50 gender ratio for employment
- Institution of fair employment and welfare - gender inclusivity: 53 Female:47 Male ratio employment

##### Social CSR

- Tower2Power and Tower2Community: impacted more than 1,600 lives

##### Governance

- Occupational Health & Safety Initiatives: 0 incidents at site
- Anti-bribery and corruption initiatives in place

#### Sustainability Challenges

On our Sustainability journey in Sri Lanka, we faced the following challenges:

- **Pandemic:** Lockdowns and health restrictions due to COVID-19 posed a challenge, reaching its peak in July to September 2021; strict restrictions were imposed on travel and gatherings
- **Economic Downturn:** In the 3<sup>rd</sup> quarter of 2021, the Sri Lankan economy contracted and experienced a downward trend which impacted plans

#### Forward-Looking Statements

**Tower2Power: Provision of electricity to homes, public community space**

- Lamp poles for streetlights and security to community, benefitting communities with street lighting. Solar-powered solutions are being reviewed at this time as Sri Lanka faces an energy crisis (Benefitting 150 families)

**Tower2Water: Provision of water and sanitation/hygiene programme for the community**

- Provision of clean water and refurbishment of public toilet facilities at Yatiyana, Kalutara District (Benefitting 100 families, providing 100 liters per sanitation facility)

**Tower2Community: Disaster Relief**

- To help local families affected by the energy crisis and find it difficult to source cooking gas, by providing freshly prepared meals

**Volunteer Programme**

- edotco Sri Lanka aspires to achieve more than 60 volunteer hours by organising a volunteer project to donate school supplies to a remote village school this coming year





GRI 102-55

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## Glossary

<b>5R</b>	Right People, Right Skills, Right Job, Right Cost, Right Time
<b>ABAC</b>	Anti-Bribery and Anti-Corruption
<b>ABMS</b>	Anti-Bribery Management Systems
<b>AML</b>	Anti-Money Laundering
<b>BAC</b>	Board Audit Committee
<b>BAKTI</b>	Badan Aksesibilitas Telekomunikasi dan Informasi
<b>BCM</b>	Business Continuity Management
<b>BD</b>	Bangladesh
<b>BIA</b>	Business Impact Analysis
<b>BRAC</b>	Bangladesh Rehabilitation Assistance Committee
<b>BRCC</b>	Board Risk & Compliance Committee
<b>BNRC</b>	Board Nomination and Remuneration Committee
<b>BUET</b>	Bangladesh University of Engineering
<b>BYOD</b>	Bring Your Own Device
<b>B2S</b>	Built-To-Suit
<b>CH<sub>4</sub></b>	Methane
<b>CIPM</b>	Certified Information Privacy Manager
<b>CO</b>	Carbon Monoxide
<b>CoDE</b>	Centre for Design Excellence
<b>CO<sub>2</sub></b>	Carbon dioxide
<b>CSR</b>	Corporate Social Responsibility
<b>CV</b>	Curriculum vitae
<b>DAS</b>	Distributed Antenna Systems
<b>DEI</b>	Diversity, Equity and Inclusion
<b>DICT-UNDP</b>	Department of Information and Communications Technology - United Nations Development Programme
<b>DLP</b>	Data Loss Prevention
<b>DNB</b>	Digital Nasional Berhad
<b>DQ</b>	Developmental quotient
<b>EBITDA</b>	Earnings Before Interest, Taxes, Depreciation, and Amortisation
<b>EQ</b>	Emotional quotient
<b>ERGs</b>	Employee Resource Groups
<b>ERM</b>	Enterprise Risk Management
<b>ESG</b>	Environmental, Social and Governance
<b>EVE</b>	Employee Voluntary Engagement
<b>GAW</b>	Global Atmosphere Watch
<b>GDS</b>	Gifts, Donations and Sponsorships
<b>GHG</b>	Greenhouse Gas

<b>GJ</b>	Gigajoule
<b>GPM</b>	Global Peace Mission
<b>GRC</b>	Governance, Risk and Compliance
<b>GRI</b>	Global Reporting Initiatives
<b>HIRARC</b>	Hazard Identification, Risk Analysis and Risk Control
<b>HR</b>	Human Resources
<b>IACP</b>	Integrity and Anti-Corruption Plan
<b>ID</b>	Indonesia
<b>IQ</b>	Intelligence quotient
<b>ISO</b>	International Organization for Standardization
<b>ITU</b>	International Telecommunication Union
<b>IVS</b>	Intelligent Ventilation System
<b>Jendela</b>	Jalanan Digital Negara
<b>KeTSA</b>	Kementerian Tenaga dan Sumber Asli
<b>kg</b>	kilogramme
<b>KH</b>	Cambodia
<b>kWp</b>	Kilowatt peak
<b>KYC</b>	Know-Your CounterParty
<b>Li-ion</b>	Lithium Ion
<b>LXP</b>	Learning Experience Platform
<b>M&amp;A</b>	Merger and Acquisition
<b>MAB</b>	Malaysian Association for the Blind
<b>MACC</b>	Malaysian Anti-Corruption Commission
<b>MAIWP</b>	Majlis Agama Islam Wilayah Persekutuan
<b>MCMC</b>	Malaysian Communications and Multimedia Commission
<b>MDM</b>	Mobile Device Management
<b>MET</b>	Malaysian Meteorological Department
<b>MFA</b>	Multi-Factor Authentication
<b>MISA</b>	Master Infrastructure Service Agreement
<b>MM</b>	Myanmar
<b>MY</b>	Malaysia
<b>NaaS</b>	Network as a Service
<b>NaPA</b>	Network and Planning Analytics
<b>NACP</b>	National Anti-Corruption Plan
<b>NCSM</b>	National Cancer Society Malaysia
<b>NIST</b>	National Institute of Standards and Technology
<b>NTCs</b>	National Tower Companies
<b>PAM</b>	Privilege Access Management
<b>PATAMI</b>	Profit after Tax and Minority Interests
<b>PH</b>	Philippines

## Glossary

<b>PK</b>	Pakistan
<b>PPA</b>	Power Purchase Agreement
<b>PPR</b>	Projek Perumahan Rakyat
<b>RAN</b>	Radio Access Network
<b>RCSA</b>	Risk Control and Self-Assessment
<b>RO</b>	Reverse Osmosis
<b>RPTC</b>	Related Party Transaction Committee
<b>R&amp;C</b>	Risk & Compliance
<b>O&amp;M</b>	Operations and maintenance
<b>OHS</b>	Occupational Health and Safety
<b>SAQ</b>	Site Acquisition

<b>SDGs</b>	Sustainable Development Goals
<b>SL</b>	Sri Lanka
<b>SteerCo</b>	Steering Committee
<b>SCOC</b>	Supplier Code of Conduct
<b>TRCSL</b>	Telecommunications Regulatory Commission of Sri Lanka
<b>UIEP</b>	Uncompromising Integrity, Exceptional Performance
<b>UNGC</b>	United Nations Global Compact
<b>USF</b>	Universal Service Fund
<b>VRLA</b>	Valve regulated Lead-acid
<b>YBSB</b>	Yayasan Bunda Siti Banun

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