# **Connecting You To What Matters Most**

dıgi

**LET'S INSPIRE** 

Our Heroes Keeping Customers Connected At All Times



## CONTENT



#### ABOUT OUR SUSTAINABILITY DATA BOOK

- Scope and Boundary
- Reporting Period
- Reporting Principles
- Reporting Suites
- Verifying and Assuring Our Data

## OUR VIEW ON MANAGING SUSTAINABILITY

- Sustainability Governance
- Yellow Heart: Our Responsible Business Commitment

AWARDS AND RECOGNITION

MATERIALITY AND OUR STAKEHOLDERS

#### TOP MATERIAL MATTERS

11

- Service Reliability and Quality
- Customer Satisfaction
- Digital Inclusion
- Climate Change and Environment
- Diversity and Inclusion, and Talent Development
- Ethics and Compliance
- Data Privacy and Security
- Supply Chain Sustainability
- Human Rights
- Digital Resilience

GRI DATA 34
GRI TABLE 36

## ABOUT OUR SUSTAINABILITY DATA BOOK

We strongly believe that building a responsible and sustainable business is critical to securing long-term success for our company. In this area, we are determined to continuously deliver quality services to drive positive outcomes for society, act responsibly and with integrity, and to do this in a transparent manner. Our commitment to corporate transparency is evidenced through this Sustainability Data Book, which discloses a wide-range of practices implemented in 2019 to address material sustainability issues related to our business and the environment we operate in. In keeping to our commitments, we have ceased producing hard copies of this report in favour of digital copies since 2016, being among the first to do so. Going forward, we aim to mature our sustainability strategy by taking a fresh look at how our technology and people can build a better future for all. This book is meant to be read together with Digi.Com Berhad's Integrated Annual Report 2019.

#### **Scope and Boundary**

Our sustainability disclosure covers the activities of our wholly owned subsidiary, Digi Telecommunication Sdn Bhd, unless otherwise stated.

#### **Reporting Period**

Unless we have stated otherwise, all data covers the calendar year 1 January to 31 December 2019. We have included two years of historically tracked data for key indicators.

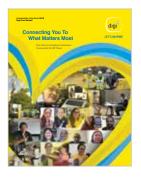
#### **Reporting Principles**

This Data Book has been prepared in accordance with the GRI Standards: Core option. These include principles such as stakeholder inclusiveness, timeliness and clarity. We take guidance from Bursa Malaysia's Sustainability Reporting Guide (Second edition) and adapting some of the best practices relevant to our business.

In addition, the procedure of compiling sustainability disclosure is in accordance with the Telenor Group Non-Financial Reporting Procedures, and Digi's Standard Operating Policy and Procedures on Sustainability Reporting. These policies and procedures provide guidance on the scope and boundaries of reporting, roles and responsibilities, internal control processes, and definitions for all reported parameters. We also adhere to established reporting standards such as the Greenhouse Gas Emissions Protocol and the CDP. We have also been reporting our environmental impact and the actions taken to reduce them to the CDP since 2009. In the past few years, Digi's environmental data has been included in Telenor Group's submission to the CDP, for which we have achieved a leadership index status in 2017.

#### **Reporting Suites**





Our Reporting Suite comprises the Integrated Annual Report 2019, the Sustainability Data Book 2019 and Corporate Governance Report 2019.

#### **Verifying and Assuring Our Data**

We employ a non-financial reporting (NFR) system which follows a strictly controlled process for data collection and all of our quantitative data is verified by Telenor Group. During the year, we commissioned KPMG PLT, an external accounting firm, to perform a limited independent assurance, defined by ISAE3000, on the GRI indicators presented in this Data Book.

#### **Digi's Performance Data**

#### **Corresponding GRI Indicators**



Suppliers signing the Agreement of Business Conduct (ABC) Total number of suppliers that the organisations' anti-corruption policies and procedures have been communicated to through signing the Agreement of Business Conduct



Energy consumption within the organisation

Total fuel consumption from non-renewable sources

Total fuel consumption from renewable fuel sources

Total electricity consumption



Scope 2 CO2 emissions Scope 2 CO2 emissions Scope 3 CO2 emissions Direct (Scope 1) GHG emissions
Indirect (Scope 2) GHG emissions
Indirect (Scope 3) GHG emissions



Lost time injury frequency

Occupational health and safety - Injury, occupational diseases, lost of days, and absenteeism, and work-related fatalities



Training hours recorded

Average hours of online learning that the organisations' employees have undertaken during the reporting period

The full details on KPMG's limited assurance opinion is available in our Integrated Annual Report 2019



# OUR VIEW ON MANAGING SUSTAINABILITY

Responsible business and sustainability are integral to Digi's strategy as it reaffirms the way we conduct business. We believe in keeping to high standards of corporate governance, to identify and manage business environment risks, maximise the positive impact of our business as well as upholding sustainability standards practiced globally. Our approach is one of continuous improvement.

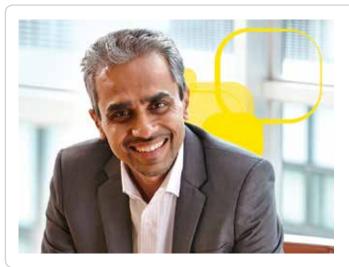
Our strong commitment to corporate transparency means we hold ourselves accountable for the impact of our operations, products and services has on the environment and value chain we operate in. Our corporate values and ethical standards represent an important foundation for implementing our governance framework as we believe that upholding high standards of corporate ethics is key to long-term value creation and contributes directly to improved business performance.

We continue in our commitment to all United Nations Sustainable Development Goals (SDG) with a focus on SDG10 Reduced Inequalities as we believe that our innovative use of digital communication can help improve people's lives, close the inequality gap and empower societies.

"Sustainability is not a strategy in addition to your business strategy. It should be part of it. The extended stakeholders we have today - shareholders, government, customers, employees, communities in which we operate in, and societies at large - have expectations towards how you are not only creating value for yourself, but creating long term shared-value."

## Haakon Bruaset Kjoel Digi's Chair of the Board and SVP of Partner Relations for Telenor in Asia Haakon speaks to BFM on the importance of the SDGs and businesses employing a sustainable leadership mindset.

Listen to the podcast



"Our role remains to enable opportunities for people and advance communities through our services, while continuing to raise responsible business standards across our operations. That's what matters most to us and continues to drive us forward."

Albern Murty Chief Executive Officer, Digi

#### **Sustainability Governance**

Sustainability in Digi is governed across various levels in the organisation – the Board, Management, and working groups consisting of different functions – Sustainability, Compliance, Legal and Governance, Supply Chain Sustainability, Network and Human Resources.

The Sustainability department sits as part of the Corporate Affairs division. The Head of Sustainability oversees the daily operations of the team to meet the non-financial Key Performance Indicators (KPIs) established jointly with Telenor Group Sustainability. Sustainability KPIs are reported quarterly to the Ethics & Sustainability Committee (ESC). Chaired by the Chief Executive Officer, the forum includes the Chief Human Resource Officer, Chief Technology Officer, Chief Corporate Affairs Officer and other senior leadership members.

More information on Digi's corporate governance practices can be found in our 2019 Integrated Annual Report, and the <u>Governance section</u> of our corporate website.



#### **Digi Board of Directors**

Oversee Digi's Sustainability Focus and Performance

#### **Quarterly Reporting**



#### **Digi Management Team**

- Responsible for sustainable business policies
- Oversees ethics and sustainability related risks and progress of non-financial KPIs
- Provides quarterly updates to the Board via Ethics and Sustainability Forum (ESF)

#### **Quarterly Reporting**



#### The Ethics and Sustainability Steering Committee (ESC)

- Comprises of members of Management and senior leadership
- Guided by sustainability guidelines, international best practices and recommendations, Digi's Code of Conduct, and policies and manuals relevant to the scope of the ESC
- Supports the Management and Board in addressing responsibilities related to compliance and sustainability

#### **On-going Reporting**



#### **Sustainability Department**

- Day-to-day management of sustainability principles, risk and issues
- Ensure compliance of relevant sustainability related policies and principles

#### **Ethics and Sustainability Forum (ESF)**

ESF is a standing quarterly agenda to the Digi Board of Directors. Non-financial Reporting (NFR) on people, social, and environmental data is collected on a quarterly and annual basis by the NFR Coordinator to be presented at this forum and signed off by the Chief Financial Officer.

Key activities performed in ESF are:

- Formulate sustainability strategy, policies and goals
- Monitor and facilitate adherence to the sustainability policy
- Support departments to meet sustainability goals
- Conduct sustainability awareness and engagement activities
- Sustainability performance reporting



#### Telenor Group Sustainability

• S

Quarterly

Reporting

- Set KPIs and alignment
- Quarterly reporting of supply chain KPis
- Annual non-financial reporting





#### Yellow Heart: Our Responsible Business Commitment

Yellow Heart is our sustainability brand promise to our customers, and it reflects our commitment towards SDG 10 Reduced Inequalities by bringing everyone on an accelerated journey towards digitalisation and responsible digital citizenship. Yellow Heart is long-term commitment to advocate responsible business practices, anchored on strong partnerships to create long-term value. This belief guides us in everything we do, bringing us closer to what matters most to customers, communities and businesses, ultimately driving brand preference.

lı	Inclusive Internet Experience For All		
Capacity Building For Schoolchildren	Skills For A Digital Future	Digital Empowerment	Advocating Responsible Business Practices
Thought leadership in internet related risks for families, digital resilience strategies to ensure Malaysians are empowered on the internet through responsible digital usage.	Bridging inequalities by providing education, access to the Internet and opportunities to upskill. In response to the demand for a digital-fluent workforce, Digi is invested in nurturing the next generation to be digitally literate and ready for future jobs.	Empowering every Malaysian – including underserved communities – with access to the Internet to benefit from a digital lifestyle. For businesses and SMEs, to increase their productivity by establishing and growing their digital footprint.	Commitment to responsible practices across the business and to maximise its positive impact through emphasis on privacy, climate, compliance, supply chain sustainability and people.
Building Digital Resilience     Created resources and     engagement for over     158,958 students on     responsible and resilient     digital citizenship.	Future Skills For All     Programme - Digi, MDEC     and UNICEF collaborated     to make digital learning     of computational thinking     and computer science     subjects accessible for     schoolchildren nationwide.	<ul> <li>Digi MY Digital SME programme - Equipped over 1000 Malaysian SMEs with tools and skills to digitalise their business.</li> <li>Yellow Heart privileges - differentiated offerings in the form of rebates and prioritised services for Seniors and Persons with Disabilities (PWD) to make services more accessible.</li> </ul>	<ul> <li>Digi Sustainability Day 2019         <ul> <li>Advocate responsible</li> <li>business practices to over</li> <li>160 corporates and SMEs.</li> </ul> </li> <li>Implemented due diligence to identify and address</li> <li>Digi's most salient human rights risk areas.</li> </ul>
Refer to <b>Top Material Matters: Digital Resilience</b> for more information	Refer to <b>Top Material Matters : Digital Inclusion</b> for more information	Refer to <b>Top Material Matters : Digital Inclusion</b> for more information	Refer to Top Material Matters: Ethics & Compliance, Data Privacy & Security, Talent & Culture, Diversity & Inclusion, Human Rights and Digital Inclusion for more information

# AWARDS AND RECOGNITION



Digi was recognised at the MCMC Star Awards 2018, an annual awards ceremony organised by the Malaysian Communications and Multimedia Commission (MCMC) to commend outstanding services provided by telecommunication companies. Digi won three award categories - 'Best Mobile Network Operators (MNO) Provider', 'Best Consumer Satisfaction' and 'Best Quality of Service'.



Digi won **Best Use of Mobile (Silver) and Best Use of Influencers (Bronze)** at The Loyalty & Engagement Awards 2019. MyDigi Rewards was recognised as a platform that builds mobile-first loyalty for today's connected customer.



Digi ranked #61 worldwide in Refinitiv 2019 Edition for Diversity Inclusion Index.



Digi emerged as **Top 20 Finalist of the PwC Malaysia's Building Trust Awards**, recognised for our efforts in building trust and value creation with stakeholders.



Digi was conferred Malaysia's Best Employer Brand Award at the Golden Globe Tigers 2019.



Digi bagged the **Bronze Awards for Excellence in Corporate Wellness** at the HR Excellence Awards 2019. The awards honours organisations for leveraging wellness programmes as a strategic opportunity to enable a positive workplace environment and for employees to lead healthy lifestyles.



# MATERIALITY AND OUR STAKEHOLDERS

In 2018, we conducted a materiality assessment on the 26 priority areas related directly to our core business. This includes priorities such as delivering quality network services, sharpening policies and practices around data protection, human rights, people, and ethics and compliance. We engaged with a wide range of external and internal stakeholders, building the basis for how we evaluate and shape our materiality matrix.

We employ the principles of AA1000 standard in conducting our stakeholder dialogues and understanding their views, encompassing the following:



#### **Inclusivity**

Identifying dynamic local stakeholders



#### **Materiality**

Identifying prevalent issues for Digi and its partners



#### Responsiveness

Forming action plans addressing a wide range of timeframes

Our stakeholders include:



Government and Regulators



Customers



**Employees** 



Shareholders, Analysts, and Investors



Suppliers and Business Partners



Media

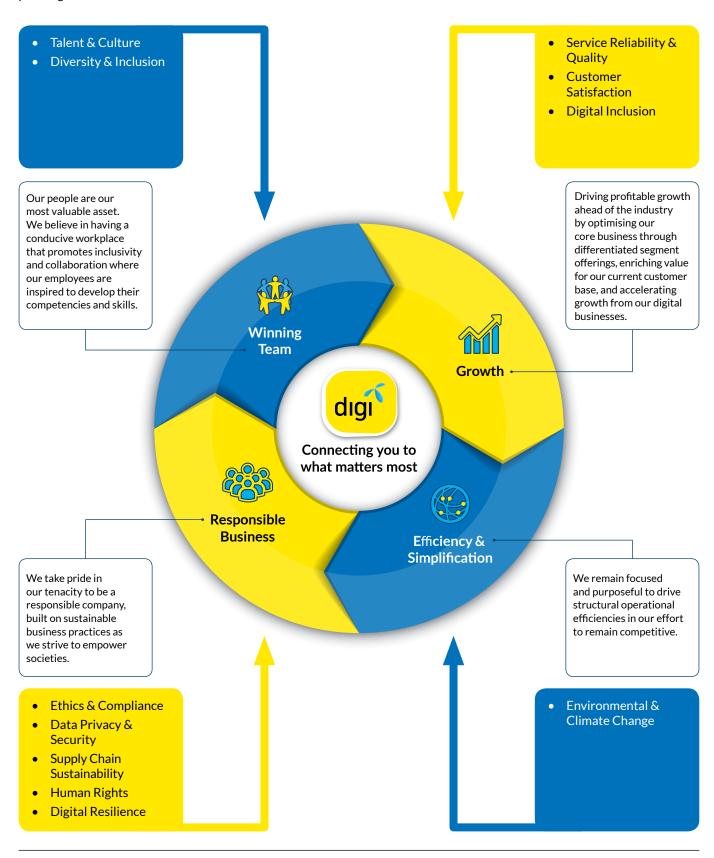


Community, Sustainability Partners, and Non-Governmental Organisations (NGOs)

(Refer to 'Our Key Relationships' in Digi's IAR 2019 for a comprehensive view of our relationship with these respective stakeholder groups)



In 2019, we refreshed our materiality assessment by collecting views from our internal stakeholders and mapping them against the 2018 assessment. Top 11 material issues emerged from the assessment that included new social trends and concerns that may have significant Economic, Environment and Social (EES) bearing on substantively influencing the assessment and decisions of our stakeholders. The selected material issues were also recategorised to our strategic pillars to guide us on our future sustainability planning.



#### Approach to Materiality in FY2019

#### **IDENTIFICATION**

We took into account enterprise risks with reference to the Global Reporting Initiative Standards and the 2<sup>nd</sup> Edition of the Bursa Malaysia Sustainability Reporting Guide (2018).

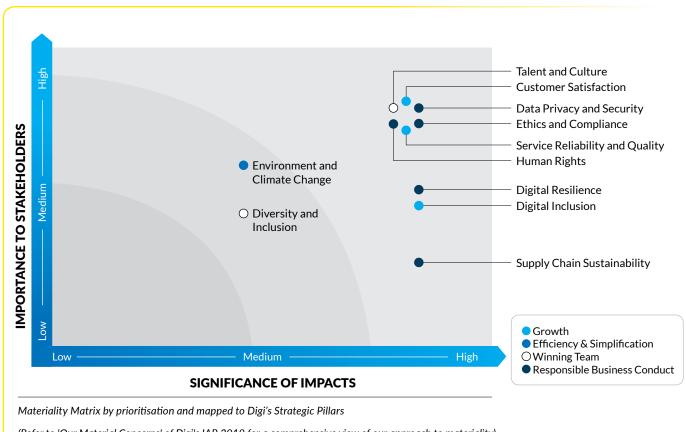
#### **PRIORITISATION**

During the year, we reviewed the relevance of our material issues. We recategorised these 11 material matters to align with our Strategy Pillars. These matters may have material bearing on our ability to create value or influence the decisions of our stakeholders. These material matters are then mapped across our value chain, as shown below.

#### **VALIDATION**

**Evaluation and discussions** at Management and Board were carried out to determine the scope and boundary of each matter to our core business and stakeholder groups.

#### **Our Materiality Matrix**



(Refer to 'Our Material Concerns' of Digi's IAR 2019 for a comprehensive view of our approach to materiality)

# TOP MATERIAL MATTERS



#### **SERVICE RELIABILITY AND QUALITY**

We now serve 9.4 million internet customers with 13.8GB average monthly data usage on our network. Data traffic volumes surged 48% y-o-y and as the demand continues to rapidly increase, we remain committed to provide a quality and consistent network experience for customers. We do understand that this influx in growth of data usage poses a healthy challenge on how we scale the network whilst being resilient in stabilising our carbon footprint. This year, we expanded our nationwide 4G plus network footprint to cover 91% of the population with 4G LTE, 72% with LTE-A, and grew our fibre network to 9,610km.

Access	Adoption
10,000 network sites	9.4 million internet users
9,610 kilometers fiber network	7.5 million LTE customers
91% 4G LTE population coverage	85% smartphone adoption
72% LTE-A population coverage	<b>↑</b> 13.8 GB average monthly data usage

#### **Governance**

The Quality of Service (QoS) function under the Regulatory team works together with the Network team to ensure optimum levels of service reliability and quality. Jointly, the teams spearhead necessary backup and mitigation activities during challenging circumstances to ensure network readiness. In parallel, a dedicated Customer Management team monitors customer concerns and escalates to the QoS function for the necessary interventions.

#### **Key Initiatives**



- We have been diligent in exploring new ways to improve on the efficacy of our network infrastructure capabilities and deployment of alternative energy sources.
- Partnership with TM Global to improve internet availability nationwide, in line with the National Fiberisation and Connectivity Plan's (NFCP) aspirations.



 On-going plans to modernise our Radio Access Network, replacing legacy with modular systems catered for future network expansion needs, e.g. 5G and Artificial Intelligence (AI) Networks.



## Operating Model Innovation

- Our engagement with Ericsson through the Common Delivery Centre (CDC) since May 2018 has resulted in optimal efficiencies in the way we manage and operate our network, enabling technology knowledge transfers across both organisations, and utilisation of the latest equipment in line with our long term network expansion plans.
- Towards mid-2019, we inked a similar partnership model with Tech Mahindra to manage selected IT infrastructure and system functions to keep pace with changing business needs. This resulted in new automation processes being introduced, cloud re-architecting and usage of AI, significantly increasing productivity and expediting our digital transformation journey.



## Network Disaster Recovery

- In collaboration with the Malaysian Communications and Multimedia Commission (MCMC), National Disaster Management Agency (NADMA) and the industry, we stepped up several initiatives in preparation of the year end floods affecting several states in Malaysia.
- To ensure network readiness in the event of a flood, we proactively readied an ample number of portable generators as back up power for network facilities, upgraded infrastructures at relocation centres for optimum coverage, and upgraded sites prone to be affected by the floods.
- We developed an information toolkit to drive public awareness on taking necessary precautionary measures to the face the flood situation. Post floods, we mobilised volunteer groups to assist in clean-up efforts of public spaces.



#### Download the flood preparedness tool-kit here



## Operational **Efficiencies**

- Reducing fuel dependencies by converting 156 generator powered sites to grid, thus reducing our Scope 1 emissions.
- Optimising electricity consumption by reducing the running hours of generators during low-peak traffic cycles.
- Over 900 sites have been identified to undergo installation of exhaust fans to minimise power consumption used in cooling systems.
- Over 50 Computer Room Air Conditioning (CRAC) units have been planned for installation across our Technology Operations Centres (TOC) nationwide, which will result in improved performance in terms of monitoring and maintaining the temperature, air distribution and humidity in the TOCs.

#### **Our Performance**



Malaysia's largest network with **11.3 million customers** 



91% 4G LTE coverage in over 300 cities and towns

9.4 million lnternet subscribers

Average network Net Promoter Score (NPS) improvement\*

NPS score +3pp



\* Based on a monthly interactive survey initiated by our internal network team

Our commitment to service quality was also reflected in the results of the Malaysian Communications and Multimedia Commission (MCMC)'s Network Performance Report 2019. The report outlined nationwide network performance measurements based on key metrics such as data throughput speeds and network latency, in line with the Mandatory Standards for Quality of Service (MSQoS). As reported, Digi recorded a 9.6% improvement to our Average Download Speed in 2019 and met all requirements in complying to the MSQoS for Wireless Broadband and Public Cellular services.

Digi Key Metrics/Year	2017	2018	2019
(Throughput) Average Download Speed	15.57 MBPS	23.10 MBPS	25.32 MBPS
(Throughput) Speeds	98.80% >650 KBPS	98.49% >1 MBPS	97.97% >1 MBPS
(Network Latency) % of the time latency ≤250ms	99.61%	99.36%	99.07%
(Network Latency) Packet Loss	0.52%	0.12%	0.02%

- i) Throughput refers to how much data can be transferred per unit of time across a network from one location to another, experienced by end user as internet speed. Higher throughput means better internet speeds.
- ii) Network Latency refers to the Return Trip Time (RTT) of data transfers on a network, how long it takes for the data to travel to its destination. Low latency is considered better than high latency.
- iii) Packet Loss refers to amount of data sent which are unable to reach its intended destination. Low packet loss indicates the network's ability to transfer data from the user end to the destination host with high reliability.



#### **CUSTOMER SATISFACTION**

Customer experiences and expectations are evolving with technological advancements and in this fast-paced environment, trust is key to nurturing long term loyalty and lasting relationships with customers. Being customer-obsessed is in our DNA and we have been employing customer-centric solutions to help create seamless, consistent and satisfying customer experiences.

#### **Governance**

We have a dedicated Customer Management team constantly working to innovate new ways of improving customer experience across our touch points. There are several integrated functions embedded across our customer management value chain - inbound traffic (voice and digital channels that include social media, email, community portal and live chat to support Digi customers and dealers) and outbound traffic (sales, collection, customer feedback); support functions (training, quality control, scheduling, traffic management) and Voice of Customer (VOC – quantitative and qualitative customer insights). Collectively, these functions are designed to drive positive customer experiences and brand affinity.

#### **Key Initiatives**



- Digi aspires to provide timely, accurate and intuitive services to customers across all our touch points. We have adopted bots and AI capabilities into our systemic workflows to ensure that we can provide enhanced customer experiences.
- As part of Digi's Contact Centre digital transformation journey, we have implemented Robotic Process Automation (RPA) in several key internal activities to improve operational efficiencies.



Customer Interaction Optimisation

- Constant monitoring of our customer support channels to provide personalised services to suit customers' interests. This includes mapping of customer journeys and automating processes to provide timely and relevant support.
- Annual company-wide customer engagement activity, Customer
   Obsessed Day, was held in July 2019 with over 1,000 Digizens reaching
   out to customers in secondary townships and Klang Valley, seeking their views about Digi and their
   mobile experiences. The activity helped employees to better understand customers' sentiment as well
   as an opportunity to promote new features on the MyDigi app.

## MyDigi, a primary hub for customer interaction

MyDigi app provides customers full control to manage their accounts through convenient self-service features while promising a secure, hassle-free 24/7 experience.





- In keeping up with the demands of our digitally-savvy customers, we are establishing the foundation for an omni channel environment to provide seamless and consistent support across all customer touch points.
- Customer feedback has been vital for our continuous improvements, be it interactions at the individual-level (Inner Loop) or organisation-wide level (Outer Loop). We have also encouraged joint-collaboration across divisions to explore options and solutions that can enhance customer journeys.
- We embarked on an initiative called #JomStart Attack to introduce our offerings and affordable bundle plans to Malaysians. This gave Digi front-liners the opportunity to engage customers and understand their needs. The initiative was carried out in Digi's key market centres in Central, Northern, Southern and Eastern regions including Sabah and Sarawak.
- As a way of work, front liners have been encouraged to employ the #digifriend mindset, that seeks to live up to customers' expectations – being dependable and having customer's interest central to everything we do.



#### **Our Performance**



## No.1

On Net Promoter Score (NPS) in the Malaysian postpaid segment

Enhanced MyDigi 3.0 is now accessed by

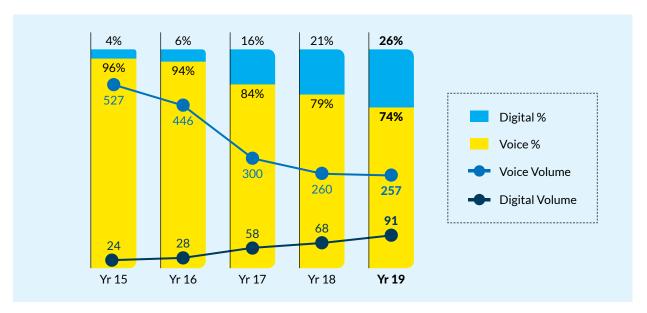
## 3.8 million

monthly active users fuelling a 27% increase in digital bill transactions and 21% rise in upsell transactions.

- Digi was recognised at the MCMC Star Awards 2018, an annual awards ceremony organised by the Malaysian Communications & Multimedia Commission (MCMC) to recognise outstanding services provided by telecommunication companies. Digi won three award categories - 'Best Mobile Network Operators (MNO) Provider', 'Best Consumer Satisfaction' and 'Best Quality of Service' awards.
- Performed reasonablywell in maintaining healthy customer satisfaction (CSAT) scores for both Contact Centre and Retail Centres

CSAT Ratings (Yearly average)	2017^	2018	2019
Contact Centre	58%	63%	62%*
Retail Centres	87%	88%	89.5%

- Based on data collected from July December 2017
- \* In early 2019, new areas were added to the CSAT survey and though this provided a more holistic representation, it has resulted in the marginal dip when benchmarked against the score in 2018. Nevertheless, the team had embarked on improvements to self-serve initiatives and case handling processes that had contributed significant improvements, overflowing to the monthly scores in 2020, as observed in the months of January and February 2020.
- Our strategic move to encourage customers to use self-serve channels for enquiries has helped reduce call volume from 94% in 2016 to 74% in 2019 in parallel to the increase in digital traffic volume from 6% in 2016 to 26% by end 2019. This has been possible through higher uptake of digital support channels such as Live Chat, Chatbot and MyDigi.



• Enhanced customer journey in submitting issues via MyDigi has enabled customers to capture their location accurately when reporting network issues. This has helped Digi to address customer concerns with greater precision and improve our timeliness in responding to customers. Close to 50% of network issues was submitted via MyDigi.

#### **DIGITAL INCLUSION**

Digi aspires to enable all Malaysians with the power of the internet to maximise its positive impact and to create an inclusive internet experience. In doing so, we firmly believe that the wealth of opportunities, enabled through the digital revolution needs to be equal for all. We are on track to provide equal internet access for all nationwide and to bridge the digital divide. This is in line with the country's aspiration to develop and evolve in parallel with the Industrial Revolution 4.0. As a digital services provider, we are committed in delivering on this ambition through the following:

- Empowering societies with broader variety and meaningful usage of digital services
- Advancing as a trusted digital business solutions provider

#### Governance

The Sustainability team spearheads outreach programmes centered on advocacy and upskilling of communities in digital literacy. In enabling an inclusive internet experience for all, we are constantly innovating our core offerings and improving processes to lower the barriers of entry for marginalised communities in adopting a digital lifestyle. On the business front, teams from Digi Business and Digi X lead in building customised solutions geared towards helping SMEs in accelerating digital adoption.

#### **Key Initiatives**

#### **EMPOWERING SOCIETIES**

#### FUTURE SKILLS FOR ALL

• Digi, Malaysia Digital Economy Corporation (MDEC), UNICEF Malaysia and Telenor Group embarked on a global partnership model to strengthen inclusivity and equity in education by establishing a free digital education platform, focused on making future skills learning accessible for all children. The digitised learning modules developed complement two national education syllabus - Reka Bentuk Teknologi (RBT) and Asas Sains Komputer (ASK) and will see more industry-oriented future skills modules being added in the future. The programme will be implemented nationwide beginning 2020, primarily through schools and identified community centres. The platform offers localised and simple self-serve learning options to attract children from diverse demographics and community. The programme is endorsed by the Ministry of Education.



### DIGITAL & FINANCIAL LITERACY FOR SENIORS

 We organised a one-day interactive, intergenerational workshop for seniors from Projek Perumahan Rakyat communities and the University of Third Age lifelong learning in conjunction with International Day of Older Persons. The objective was to help seniors in Malaysia build financial and digital competencies.



### STRENGTHENING INCLUSION FOR SENIORS & PWDs

- We hosted members from the rare disease community to discuss on inclusion and bullying issues facing the disabled. The session was jointly organised by Digi, the Malaysia rare disease community and Mrs. Malaysia International Global.
- Promoting digital uptake: Lowering the entry barriers of adopting a digital lifestyle through rebates for Seniors and PWDs - offering an RM 10 monthly lifetime rebate on all Digi postpaid plans.



- Differentiated offerings:
   Personalised offerings through our products and services including curated rewards on MyDigi for the community segments using analytics.
- Prioritised services: Priority queues for seniors, PWDs and pregnant women across our touchpoints.

#### TRUSTED DIGITAL BUSINESS SOLUTIONS PROVIDER

### MY DIGITAL SME PROGRAMME

• The programme aims to equip local small and medium enterprises (SMEs) with tools and skills to digitalise their businesses and to grow their online presence, enabling for growth opportunities globally. Held in collaboration with SME Corp, Mahir Digital Bersama Google, AVANA Facebook Commerce, REV Asia and Shopee, the programme empowered over 1,000 Malaysian SMEs with digital tools and opportunities for global expansion, thus fostering growth in the SME segment.





### DIGITAL SOLUTIONS FOR CORPORATES

- Omni Hotline for AXA Affin Life, MeDKAD and DoctorOnCall
   An enterprise level virtual phone system that offers features such as interactive virtual receptionists, call menus and extension lines – which enable seamless customer service and real-time responses.
- iFleet Video.
  iFleet is an integrated Internet of
  Things (IoT) fleet management
  solution for commercial vehicles. The
  solution includes global positioning
  system (GPS) Telematics Devices in
  the iFleet GPS Tracker, in-vehicle
  dashcam through iFleet Video and

in-vehicle WiFi through iFleet WiFi.

• iFleet GPS Tracker, iFleet Wi-Fi and

 Network and mobile connectivity solutions for Westports Malaysia and Pelabuhan Tanjung Pelepas (PTP)
 Digi's highspeed wireless connectivity solution and data communication system, coupled with the ports' sophisticated operating platforms resulted in increased productivity and efficiencies, realising the ambition of a digitally-enabled Smart Port.

### SUSTAINABILITY DAY 2019

 Digi hosted a summit to upskill small and medium enterprises (SMEs) in Malaysia by sharing our responsible business practices and Yellow Heart initiatives. Over 160 corporates and SMEs attended the event which comprised forums and talks by Digi and experts in the respective fields. This strengthens our thought leadership on topical issues surrounding the SDGs, internet safety, digital inclusion, anticorruption, privacy, supply chain, and employer branding.



#### Footbraille - A National Day Project



In the spirit of bringing all Malaysians together to celebrate our 62 National Day, we introduced Footbraille, a prototype solution to help the visually impaired experience a football match. The solution is a touch table which syncs wirelessly to a custom software that inputs the ball's movement, and creates a touch-based response allowing users to "feel" the match.



Watch the video



#### Freedom to Inspire

Strengthening our Yellow Heart commitment to empower all Malaysians with access to the Internet to reduce inequalities, we embarked on a video series campaign featuring inspiring individuals who beat the odds in realising their dreams. Watch the videos here:



Yellow Heart:
We Are All Canable



Yellow Heart: Capture Your Dreams



Yellow Heart: Don't Let Age Define Your Limits



Yellow Heart:



Yellow Heart: Mencapai Impianmu





#### **CLIMATE CHANGE AND ENVIRONMENT**

Climate change is a global challenge and we see ourselves as one of the key enablers towards building a decarbonised world by improving our internal processes and leveraging on our digital solution offerings. As part of the Telenor Group, we have set a Science-Based target in line with the latest climate science to achieve a 50% reduction in our carbon emissions by 2030 from a 2018 baseline. We align ourselves to the government's ambition for a low carbon economy and plans such as the National Energy Efficiency Master Plan and a national target to increase renewable energy generation to 20% by 2025. We continue to undertake initiatives to make our entire operations more efficient to achieve a net-positive ratio between our operational footprint and carbon reduction. As enablers, we can influence our supply chain to integrate sustainability solutions across their value chain. Our innovative digitised offerings help corporate and SME customers better manage their carbon emissions and we continuously hold dialogues and discussions with industry, government and non-governmental organisations to advance industry progress, establish best practices, and support responsible disclosure. In 2020, Telenor is disclosing more climate-related risks information in line with the Task Force on Climate-related Financial Disclosures (TFCD) recommendations, and it encompasses Digi's climate related information.

#### **Governance**

Environmental Sustainability is embedded into our business operations and seen in the overall context of the business. Each Division, led by the respective Heads of Divisions shoulder the responsibility of ensuring proper practices, aligned to climate and environment business decisions as stated in our Sustainability Policy and our Climate and Environment Manual. At Digi, we are managing environmental responsibilities in a systematic manner with Environmental Management System (ISO 14001:2015) including the proper management of waste, water and e-waste. Further details of how we manage our environmental impact via network infrastructure is available in the "Service Reliability & Quality" section.

#### **Key Initiatives**

#### SUSTAINABLE WORKPLACE

A sustainable workplace ensures business continuity by saving or restoring natural resources and propagates improved employee productivity.

In keeping up with our headquarters and Technology Operations Centre (TOC) being accredited with Gold certification by Leadership in Energy and Environmental Design (LEED) in 2017, and by Green Building Index (GBI) in 2012 and 2016 respectively, we are exploring ways to effectively monitor and modify our resource consumption. These includes undertaking improvement measures in the following areas:

- Reducing use of material resources, waste and environmental degradation
- Reducing pollution of air, earth and water in material sourcing and manufacturing, during construction and over the life cycle of the building
- Reducing damage to natural systems and bio-diversity
- ▶ Ensuring efficient energy, water and resource consumption
- Providing high quality and healthy productivity spaces, utilising elements such as natural light and responsive heating/cooling measures
- Establishing workplace wellness programmes
- Adopting green procurement



Environmental Management System (EMS)

#### **Our Performance**



- In 2019, our carbon emission has increased 4.8% y-o-y. Moving forward, we will adopt low carbon solutions in line with our Science-Based target to achieve a 50% reduction by 2030. This includes the conversion of 156 generator powered sites to grid in the year.
- Annual GHG emissions inventory in accordance to the GHG Protocol Corporate Standard:

Digi Climate Metrics/Year	2019	2018	2017
Scope 1: Direct Energy Consumption from Fuel (GwH)	43.47**	48.2**	101
Scope 1: Carbon Emissions (Tonnes)	10,677**	11,738**	24,262
Scope 2: Indirect Energy Consumption from Grid and Green Electricity (GwH)	250.6	230	194
Scope 2: Carbon Emissions (Tonnes)	162,870	153,769	131,926
Scope 3: Indirect Energy from Value Chain (GwH)	8	9	9
Scope 3: Carbon Emissions (Tonnes)	1,653	1,728	1,782
Total Energy (GwH)	302	287.2**	304
Total Carbon Emissions (Tonnes)	175,200	167,235**	157,970

<sup>\*\*</sup> In 2019, Digi underwent a review exercise of the methodology used to calculate fuel consumption of our generators used to power equipment for our network, taking into consideration efforts to convert generator powered sites to the grid. Based on our review, we had estimated a higher reporting capacity in prior years. Towards this effect, we have restated our 2018 figures based on the changes in methodology used.

#### **Our Performance**



 Improved Carbon Intensity per Data Usage by 28% y-o-y. This means that though the average customer is using more data, we have achieved a lower carbon footprint per unit of data consumed. Our carbon intensity is measured by tonnes of CO<sup>2</sup> (tCO<sup>2</sup>e) per terabyte of data.

Digi Intensity Metrics/Year	2019	2018	2017
Customer Base (mil)	11.28	11.66	11.75
Energy Usage per Customer (KwH)	26.7	24.6	25.8
Carbon Intensity per Customer	0.016	0.014	0.013
Energy Usage per Data Terabyte (MwH)	0.22	0.31	0.56
Carbon Intensity per Data Usage (tCO <sup>2</sup> e)	0.13	0.18	0.29

#### General Waste

Waste collected/Year	2019	2018	2017
General waste (Tonnes)	281	284	284
Waste generated per employee (Kg)	183	176	141
Waste recycled (Tonnes)	6	6	13

(Total number of employees accounted in 2019 – 1535)

#### E-Waste\*

E-waste directly produced from our operation is managed under the Environment Quality (Scheduled Wastes) Regulation 2005 and our internal guidelines.

Obsolete electrical and electronic waste/Year	2019	2018	2017	
Collected (Tonnes)	29	145	69	
Recycled (Tonnes)	29	1.3	6	

Decommissioned network equipment constitutes the largest amount of e- waste generated by tonnes. We reuse equipment, and send those that are obsolete to recycle and disposed of safely by a licensed vendor. Our target is to achieve 100% recycling rate of decommissioned electrical and electronic equipments.

#### Water Consumption

Water consumption/Year	2019	2018	2017	
Total (m³)	93,770	102,548	101,328	
Water consumption per employee (m³)	61	63	51	

(Total number of employees accounted in 2019 - 1535)



#### **DIVERSITY AND INCLUSION AND TALENT DEVELOPMENT**

Digi strives to provide an exceptional employee experience that matches our aspirations to give our employees the 'Freedom to Inspire the Next'. We believe this is central to deliver on Digi's brand promise of connecting our customers to what matters most. Consequently, we are determined to continue building an inclusive, dynamic workplace that nurtures a learning, agile, collaborative environment that promotes a culture of innovation and customer obsession. All this, with the aim of fostering an environment that attracts high-performing talent while encouraging them to continuously develop their digital competencies.

#### Governance

Digi's Human Resource (HR) division and Compliance and Labour Law department is responsible for ensuring adherence to policy requirements, goals and targets of people related matters in Digi. Led by the Chief Human Resource Officer, the HR function comprises of departments focusing on Employee Experience, Learning & Development, Employee Benefits, Talent Recruitment and Diversity & Inclusion, led by line managers who oversees the respective portfolios.

#### **Key Initiatives**



 Our way of work is deeply rooted on putting customers 1<sup>st</sup> and taking an innovative 360 approach in everything we do. This forms our DNA and has been a strong foothold in driving desired qualities such as empowerment, shaping of a performance driven culture, resilience in adversity while upholding strong values.





- We believe in building a diverse and inclusive workforce at all levels of the organisation to maximise the power of different experiences.
- Diversity is a critical pillar of good governance as it drives better decision making, stimulates innovation, increases organisational agility and strengthens resilience to disruption.





 Our employer brand promise is to give employees the freedom to always explore, supported by a collaborative culture and working environment. This belief guides us in embracing a culture of challenging the norm, allowing employees to unlock their full potential.

In engaging with various external talent partners and communities, we
organised the fourth season of the Digi CXO Apprentice programme,
registering over 1,590 applications. Eight young talents have been
selected to work directly under the guidance of Digi's Management
Team.





- We have embraced a culture of continuous learning and encourage our employees to upskill and even
  relearn new skills to keep up with the demands of the transforming technological landscape in the
  wake of the fourth industrial revolution. Depending on their level of proficiency, employees are offered
  structured learning paths in the seven expert competence areas deemed critical to Digi's business
  strategy Data & Analytics, Personalised Marketing, Product Management, Automation & Processes,
  Cyber Security, Customer Facing IT and Cloud & Virtualisation.
- This year, 70 leaders from Digi have been selected to participate in the Strategy Execution Programme organised in collaboration with Telenor and Deloitte. This programme is essential in equipping our leaders with concepts of business agility and skills to navigate through new paradigm shifts, as well as enabling them to hone their leadership skills to drive an agile culture and mindset.



Since 2018, Digi has embarked on embracing the agile mindset and culture within the organisation.
 This transformative approach encompassing shifts in organisation structures and improvements to processes while maintaining strong governance, has enabled us to be quicker in going to market and addressing customer needs.



- We have in place the Labour and Employee representation through our Best on People Council (BOPC) and Digi Employees Union (DGEU).
   Both councils are formed via democratic process by election of representatives across Digi.
- In addition, we conduct an employee engagement survey on an annual basis to gauge our employees' expectations of the company.

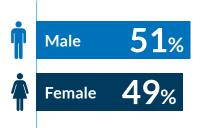


#### **Our Performance**



- Digi ranked #61 worldwide in Refinitiv 2019 Edition for Diversity Inclusion Index.
- Digi was conferred Malaysia's Best Employer Brand Award at the Golden Globe Tigers 2019.
- Digi bagged the Bronze Awards for Excellence in Corporate Wellness at the HR Excellence Awards 2019. The awards honours organisations for leveraging wellness programmes as a strategic opportunity to enable a positive workplace environment and for employees to lead healthy lifestyles.
- Achieved a total of 78,568\* online learning hours, averaging at 51.3 hours per employee.
- Digitisation of Employee Handbook for greater accessibility.

#### **Balanced** Gender ratio



#### % of women in leadership positions\*





\* This accounts for CXO -1 and CXO -2 managerial positions

### 2019 Employee Engagement & Enablement Survey (EES) Scores









Engagement Scores 80%

Enablement Scores 79%

Effectiveness 65%

Incremental % are benchmarked against 2018 data

On Effectiveness scores, we have outperformed the 58% benchmark scored by High Performing Companies



- Digi co-organised Women for Tech Leaders Reception with GSMA as part of the Mobile 360 Digital Societies Summit. Discussions were centered around women working in the tech industry, gender and diversity gap in the industry, and maximising value and leadership skills for women as part of career progression.
- Digi's Chief Human Resource Officer, Elisabeth Stene speaks at the Human Capital Best Practices 2019 (HCBP'19) Conference, to share best practices in innovating HR for the digital future.





Digi co-hosts industry-first Botathon Event for Digital Acceleration with Automation Anywhere. The Botathon allowed Digi employees to interact with software bots to automate repetitive tasks – liberating people to focus on higher-level business initiatives that only humans can provide. The initiative was part of Digi's Innovation 360° efforts to encourage employees to digitally transform by providing them with various platforms to apply innovation to their work and opportunities to upskill and develop new competencies.





#### **ETHICS AND COMPLIANCE**

Compliance is a strategic priority for us and forms an essential element of good corporate governance. To maintain our high standards in keeping abreast to the changes in local laws and regulations, we are committed to embed principles of effective compliance management in the day-to-day running of the business - integrating sustainable best practices that would drive responsibly informed decisions and resulting in improved business performance. We employ a proactive approach in addressing compliance across the board, encompassing our people, processes, data and systems, that are supportive of the current economic, regulatory, social and environmental expectations set forth by our stakeholders. The same level of commitment is expected of our business partners and suppliers, to ensure we can continue to be a brand that customers can trust.

#### **Governance**

Ethics and compliance incidents are monitored by Digi's Compliance and Labour Law department and the Internal Audit department. The Internal Audit department is responsible for all reports received through an independent integrity hotline for Digizens, suppliers, stakeholders and the general public to speak up on any non-compliance incidents. The team works closely with the Compliance and Labour Law department to manage incidents related to compliance, minor misconduct and grievances through investigations, taking appropriate action, including legal action if required. Both the Internal Audit department and the Compliance and Labour Law department provides updates to the Management and the Board on a regular basis. The Audit and Risk Committee has responsibility over the reported incidents and to ensure investigations are conducted objectively and independently.

#### **Key Initiatives**



- Compliance begins with the top management setting the tone on fostering a culture of integrity and the behaviours within the company.
- Appointment of Integrity Ambassadors across all divisions to support in compliance awareness initiatives and data gathering.
- Monitoring declarations for gifts, events and arrangements, and conflict of interests.
- Launch of Integrity Due Diligence (IDD) platform in 2019 to perform integrity background checks on business partners.
- Launch of Speak Up campaign 2019 to encourage Digi staff to come forward with integrity related questions or concerns.





 Our Code of Conduct (Code) is the foundation of Digi's corporate culture and sets out high standards of integrity for how we do business. It is developed on four Core Principles:

We play by the rules We are transparent and honest

We speak up

We are accountable for our actions

Our Code is published online <a href="here">here</a>



- During the year, we conducted the Integrity & Governance Day 2019 for Digizens to internalise the Code and its principles. External speakers were invited to share knowledge on various topics surrounding forensics investigation, harassment and bullying in the workplace, integrity and ethics, protecting personal data, diversity and inclusion and Human Rights, among others.
- Dilemma training on the Code is conducted for the senior leadership team in Digi.

## ANTI-BRIBERY AND ANTI-CORRUPTION

- We have a clear zerotolerance policy towards bribery or corruption and our Anti-Corruption Policy is made publicly available covering a wide spectrum of areas such as bribery, facilitation payments, and No Gift Policy among others.
- During the year, we performed a gap analysis on implementation of adequate procedures in accordance with Section 17A of the MACC (Amendment) Act 2018 on Corporate Liability which will directly expose directors and the Management for any corrupt practices by its associated persons. Gaps have been identified for improvement.
- On an annual basis, all Digi employees are required to complete the Code of Conduct (Code) e-learning and acceptance of the Code. All new employees undergo an Anti-Corruption training as part of on-boarding and are required to complete the e-learning module.

### REGULAR MONITORING

- A company-wide annual risk assessment exercise is carried out to identify the Company's risk exposures and put in place appropriate remediation plans.
- To enhance monitoring of business partners, we implemented a new business partner risk management policy. The policy requires relevant employees to screen business partners for integrity concerns prior to engagement. This is necessary in ensuring that Digi's business relationships with all business partners do not pose unacceptable risks to the company.

#### **Our Performance**



Improvement of Integrity Index score by

+2 points,

as reflected in the 2019 Employee Engagement Score (EES) Survey Digi was among

## **Top 20 Finalist**

of the PwC Malaysia's Building Trust Awards recognising our efforts to build trust and value for our stakeholders. 100%

Digizens completed the signing of the Code in 2019, which is now fully digital.



**Integrity Hotline** is a confidential channel to report concerns and raise questions about possible breaches of Digi's Code of Conduct, including relevant laws, regulations and Governing Documents. The service is accessible via web 24 hours a day, seven days a week. Any query or report made will be treated in confidence. All employees, suppliers, stakeholders and the general public are encouraged to speak up through the hotline.

#### **DATA PRIVACY AND SECURITY**

Digi prioritises data protection to ensure employees' and customers' personal data are safe and secure. Our data privacy strategy incorporates strong governance around strengthening privacy controls to drive a responsible business culture, supported by continuous awareness on safe privacy practices and information management.

#### **Governance**

Digi has a clear privacy and information management position. We are transparent about how personal data is collected and used, committed to using personal data to provide better and more relevant services, and thorough in keeping personal data safe. Digi constantly reviews its routines and processes for privacy, authority requests and information management. These functions are monitored under the purview of Digi's Data Protection Officer (DPO), and Head of Legal.

#### **Key Initiatives**



- Customers' concerns about the use of their online data are continuing to increase and we have a commitment to put their data privacy and trust at the cornerstone of the organisation's digital transformation strategies. We have simplified our data processing framework that includes revisions to our Privacy Requirement Checklist (PRC), Data Protection Impact Assessment (DPIA) and Data Processing Agreement (DPA Full and Lite versions). These refreshed framework sets procedural guidance as part of the Supply Chain Management programme.
- Improved internal privacy controls through embedment of stringent access control and management
  of data requests. Externally, improvements to privacy compliance at Digi Stores, Digi Store Expresses,
  Digi dealers, vendors and third parties. Annual audits are conducted on selected vendors to ensure full
  compliance.



- Incorporate Privacy requirements within asset classification and preparation of response plan in the event of a data breach.
- Frontliners are trained on Personal Data Protection Act (PDPA).
- Bi-weekly privacy and information management sessions as part of Digizens on-boarding process.



**Awareness** 

Big Data & Personalised Services

- We have strengthened our compliance on management of big data to ensure its utilisation complies with local privacy and regulatory requirements, drawing learnings from best practices in engagement with Telenor Group.
- We have concluded a gap analysis exercise with Digi's data science team and will use the results to formulate Digi's Data Governance Framework.



Asia Privacy Programme

- The two-year programme driven by Telenor Group aspires to operationalise privacy compliance across its Asian Business Units. The initiative runs each quarter in sprint-formats and looks at new areas for continuous improvement. Initiatives arising from this programme include systemic mapping of assets and processing activities, monitoring consent management across the value chain and improvement of data security by way of enacting a data breach response plan.
- To date, we have identified 70 systems in Digi, all of which has undergone the asset mapping exercise. This sets good precedence of documentation as and when new systems are introduced.
- Other improvement areas include the availability of our Privacy Notice in a clear, intuitive and comprehensible manner to our customers.

#### **Our Performance**



- Simplified data processing framework with enhanced revisions to PRC, DPIA and DPA.
- Nationwide awareness training sessions for over 700 Digizens, educating them on privacy risks and good practices on handling information.
- Introduced our Privacy Notice in an infographic format to better inform our customers on how we use their personal data as well as educating them on exercising their rights as customers.

#### **SUPPLY CHAIN SUSTAINABILITY**

Suppliers are vital to our business success, as well as our social and environmental efforts. Our fundamental responsibility as an employer is to keep all people who work for us safe from harm - and we do not differentiate between our own employees, in-house contractors, partners or suppliers' employees. Our key risks are within working conditions in our business operations, such as health and safety and labour standards including modern slavery and child labour. We believe our supply chain is an area where there is an extraordinary opportunity to improve business performance, to reduce our environmental impact and positively influence social equality, which includes mitigating human rights risks and health and safety risks.

#### Governance

Digi's approach to supply chain sustainability is to legally oblige suppliers to uphold responsible business practices according to our policies and Supply Chain Principles (SCP). We follow up on training, questionnaires and inspections to ensure preventive strategies for Health, Safety and Security (HSS), anti-corruption programmes are in place with our suppliers as well as address sustainability risks in the downstream value chain, distribution and sales channels, with digital suppliers, as well as new digital businesses.

#### **Key Initiatives**



#### COMPLIANCE

- Integrity is a vital part of Digi's business, and we exercise due diligence when it comes to selecting business partners to ensure compliance with our ethical standards. We have implemented mandatory requirements for screening and conducted integrity due diligence (IDD) assessments on all business partners and suppliers. Parties with a direct contractual relationship with Digi are legally obliged to uphold responsible business practices and adhere to our SCP.
- In 2019, all 111 newly registered vendors signed the Agreement of Responsible Business Conduct (ABC) which communicates our anticorruption policies and procedures. We conduct unannounced inspections annually to ensure compliance and mitigate risks.



#### **ASSESSMENTS**

- We monitor our supply chain with risk assessments that may be carried out as part of procurement processes or as ad-hoc supplier risk assessments by using a Supplier Assessment Questionnaire (SAQ). We concluded 44 SAOs and closed findings for 21 SAOs in the year. We also conducted 30 announced and 430 unannounced inspections and implemented corrective action and remedial initiatives. As a result of failing to meet our safety standards, four contractors were terminated.
- During the year, we engaged with officers from Department of Safety and Health (DoSH) and led an industry level collaboration to provide training and conducting joint-inspection sessions involving multiple vendor groups. This has resulted in over 800 vendors being engaged.
- We conducted joint-inspections with 13 safety officers from Tier-1 vendors.



#### **CAPACITY BUILDING**

- All our suppliers underwent capacity building workshops accumulating 2,594 training hours in the areas of safety awareness guidelines, proper ways of using equipment and human rights awareness.
- · Additionally, we increased the Health and Safety governance with the formation of Industry Collaboration initiatives - conducting joint-training sessions in Sabah, Penang and Johor, involving over 850 Tier-1 and Tier-2 contractors.

#### **Our Performance**

A total of



1,793 Digi registered

vendors has signed the ABC to date

Re-certified for

**ISO 9001:2015 Quality Management System** 

and received the

**Bronze Award for Excellence** in Corporate Wellness

Adoption of

ISO 45001:2018 **Occupation Health and Safety Management System** certification

#### **HUMAN RIGHTS**

Protecting human rights remains fundamental to our business, especially in the digital age. Digi is committed to respecting human rights and we take measures to mitigate and minimise the risk of potential misuse across our value chain, encompassing our operations, products and business engagements. Our Code, policies, vision and values and Supplier Conduct Principles provide Digi with a common approach as to how we treat each other, how we serve our customers, how we run our business and deliver our obligations to society.

#### Governance

Human Rights issues are collectively addressed by several different functions within Digi, including Sustainability, Supply Chain Sustainability, Privacy (Local Authority Requests), Compliance and Labour Law, and Human Resources. Digi, as part of Telenor Group is committed to respecting human rights as set out in the UN Guiding Principles on Business and Human Rights, Children's Rights and Business Principles, and the UN Global Compact.

#### **Key Initiatives**

## ADDRESSING POTENTIAL RISKS AND IMPACT TO OUR BUSINESS

- Policies and processes -
  - The principle of respecting human rights is anchored in our Code.
  - Emphasised the importance of human rights in our renewed Employee Handbook.
  - Human rights is also emphasised in the Code and SCP as part of the implementation of business partner compliance risk management.
- Guidance Development of topical human rights due diligence toolkit based on the UN Guiding Principles on Business and Human Rights.
- Training and awareness Scenariobased learning and workshops for relevant departments including discussions at Management and Board.

Further details are available in the "Ethics and Compliance" and "Supply Chain Sustainability" section.

#### **COLLABORATION**

- Stakeholder dialogue with peers, civil society, investors, academia, government.
  - We took part in the Digital Rights national seminar, organised by the Malaysian Communications and Multimedia Commission and The IO Foundation. We shared best practices on raising awareness of digital rights in societies and its evolution in the digital environment.
- Industry/multi-stakeholder initiatives – Digi as part of Telenor Group is a member of the Global Network Initiative (GNI), UN Global Compact (UNGC) and GSMA.

#### BEING TRANSPARENT ON CHALLENGES AND COMPANY PRACTICES

- Annual reporting Disclosures in this report and to UN Global Compact, as part of Telenor Group
- Sustainability updates Annual updates to stakeholders on key human rights issues.

#### **Human Rights issues most salient for Digi**



Ensuring privacy and security of customers' data



Protecting the **freedom of expression** and **privacy rights** of customers



Online safety and other steps to protect the rights of vulnerable groups in society such as children and minorities



Increasing access to technologies



Compliance with labour standards



Ensuring health and safety of employees and contractors



Preventing **discrimination** of any kind on the basis of race, gender identity or expression, religion, nationality, marital status, age, and disability among others



Respecting land rights when building and maintaining networks



#### **DIGITAL RESILIENCE**

We continue to drive thought leadership and solid momentum in keeping children and young people safe through responsible and resilient digital citizenship. Technological advancements foster innovative developments; hence we work to ensure children and young people are able to navigate through the digital world responsibly.

We work with various like-minded partners such as Telenor, Ministry of Communications and Multimedia (KKMM), Malaysian Communications and Multimedia Commission (MCMC), Ministry of Education, Malaysian Digital Economy Corporation (MDEC), UNICEF Malaysia, Petrosains, The Star R.AGE, and many others to drive our ambition to develop digital competencies and resilience of Malaysians. This year, we have engaged more than 158,958 students and sustained our leadership position in tackling different aspects of online safety including engagements with marginalised communities.

#### Digi recognised as exemplary technology company championing Online Child Safety

In October 2019, ECPAT International (formerly known as *End Child Prostitution and Trafficking*) launched the Country Overview Briefing Paper on sexual exploitation of children in Malaysia. The briefing paper was using information included in the 'Out of the Shadows Index' (The Economist Intelligence Unit) and the ECPAT Country Overview for Malaysia. The index ranked 60 countries globally, and covered over 140 indicators.

Malaysia ranked 23 out of 60 and was recognised as one of the top performers in the region with a score of 54.5. In the 'Out of the Shadows Index', Malaysia received a score of 100/100 under the initiatives for technology industry engagement indicator and online grooming indicator. In the report, under private sector engagement, Digi was singled out as an exemplary contributor in this area leading to this impact.



ECPAT International, formerly End Child Prostitution and Trafficking, is a global network of civil society organisations that works to end the sexual exploitation of children. For more information, visit https://ecpat.exposure.co/malaysia.

#### **Key Initiatives**

#### **Annual National Kindness Week**

In 2019, for the third consecutive year, we partnered R.AGE, UNICEF, SP Setia and the Ministry of Education in the **#StandTogether campaign** to end violence against children. The Ministry of Education has endorsed the first week of every April as the official **National Kindness Week** in all schools across Malaysia. Together, the partners set up a resource centre and campaign for running "kindness" activities in schools to combat issues of bullying and cyberbullying. The campaign is also supported by up to a dozen Malaysian celebrities such as Harith Iskandar, Lisa Surihani, and Chef Wan among others. Digi spearheaded the **KINDNESS TOUR**, which is a year-long nationwide townhall roadshow for schools on cyberbullying and digital citizenship partnering UNICEF, R.AGE, MOE and Childline.

It consists of a 4-hour townhall sessions, engaging 750 schools through 14 sessions and impacting 45,000 students nationwide. To strengthen our diversity and inclusion commitment towards reduced inequalities, we conducted four special townhall training sessions for 80 children from marginalised communities, comprising refugee and indigenous children, as well as hearing, learning, and visually impaired children. Conducting the sessions with the marginalised communities expanded our outreach to be more encompassing and inclusive by employing innovative modes of engagements, suited to the community segments' needs.



#### Safer Internet Day 2019

In conjunction with Safer Internet Day 2019, we committed to further protect our customers through promoting safe internet practices to all Malaysians. In line with this year's theme, Together for Better Internet, we featured an exclusive series of Public Service Announcement (PSA) videos across 30 Digi Stores nationwide on 14 and 15 February and followed by related materials on safe internet shared across our social media platforms. We also worked alongside some of our country's leaders and social influencers to promote safe internet practices.



Watch the video

#### Joining Forces with Miss Universe Malaysia Against Body Shaming

Digi and the Miss Universe Malaysia Organisation came together for a three months #YourBodyYourSay programme to educate and empower tertiary students and universities on how to build online resilience and combat online body shaming. This programmed was headlined by Miss Universe Malaysia 2019 Shweta Sekhon.

#### Joining forces with UNICEF and Childline at the Malaysia SDG Summit 2019

Together we organised the Children's SDG Forum, led by children from a diverse group of marginalised communities, voicing out their ambitions for a healthier, inclusive and safer Malaysia by 2030. CEO, Albern Murty also spoke as part of the panel at the Business Leaders SDG forum, discussing issues arising from megatrends and the need for reinforced partnerships to accelerate the achievement of the SDGs.

## **GRI DATA**

#### **Responsible Business**

	Unit	2017	2018	2019
Anti-Corruption				
Material cases of corruption	Number	1	0	0
Supply Chain Sustainability				
Signed Agreement of Business Conduct	Number	165	162	111
Inspections conducted	Number	898	464	460
Incidents of major non-compliance <sup>1</sup>	Number	1	8	4
Incidents of minor non-compliance <sup>2</sup>	Number	3	35	0
Contractors suspended < 6 months	Number	2	2	0
Contractors terminated	Number	5	6	4
Fatalities <sup>3</sup>	Number	0	0	0
Supplier training	Hours	2,690	2,060	2,594
% of contracts < USD250,000 meeting sustainability criteria	%	100	100	100

Major non-compliance includes climbing base station without a Work At Height Permit, safety harness, and safety shoes on site
 Minor non-compliance includes illegal labour, no first aid kits, no fire extinguisher.
 Fatalities of any worker of contractors or sub contractor

#### **Climate Change & Environment**

	Unit	2017	2018	2019
Energy Consumption				
Total direct energy used	GWh	109.71	57.20	51.48
Network	GWh	96.32	46.60	37.96
Fleet	GWh	13.33	10.54	13.46
Buildings	GWh	0.06	0.06	0.06
Total indirect energy used	GWh	193.94	230.00	250.57
Network	GWh	187.12	223.07	243.67
Buildings	GWh	6.82	6.79	6.90
Total energy consumption	GWh	303.64	287.20	302
Energy use per end use customer	KWh/customer	26.0	24.60	26.70
Solar power generated (Network)	GWh	0.50	0.41	0.08
Carbon Emissions				
Total Scope 1 emissions	Tonnes CO <sup>2</sup> e	24,261.59	11,738	10,677
Network	Tonnes CO <sup>2</sup> e	23,478.29	11,238	9,253.90
Fleet vehicles	Tonnes CO <sup>2</sup> e	770.38	499.95	3,075.89
Building	Tonnes CO <sup>2</sup> e	12.92	0.03	0.03
Total Scope 2 emissions	Tonnes CO <sup>2</sup> e	131,926.08	153,769	162,870
Network	Tonnes CO <sup>2</sup> e	127,274.84	149,226.49	158,385
Buildings	Tonnes CO <sup>2</sup> e	4,651.24	4,542.51	4,485
Total Scope 3 emissions	Tonnes CO <sup>2</sup> e	1,782.19	1,782	1,653

	Unit	2017	2018	2019
Carbon Emissions				
Air travel	Tonnes CO <sup>2</sup> e	948.77	878.74	802.67
Leased vehicles	Tonnes CO <sup>2</sup> e	833.43	849.16	850.12
Total carbon emissions	Tonnes CO <sup>2</sup> e	157,970	167,235	175,200
Carbon emission per customer	Tonnes CO <sup>2</sup> e/customer	0.0135	0.014	0.016
Carbon intensity per data usage	Tonnes CO <sup>2</sup> e/terabyte	0.29	0.18	0.13
Other environment indicators				
E-waste collected	Tonnes	69	145	29
Municipal waste	Tonnes	284	284	281
Water consumption	m³	101,328	102,548	93,770

#### **Winning Team**

	Unit	2017	2018	2019
Gender				
Male	Numbers	1,117	808	777
Female	Numbers	891	804	758
Total	Numbers	2,008	1,612	1,535
Race				
Bumi	%	3	2	2
Malay	%	33	28	29
Chinese	%	45	51	51
Indian	%	16	16	15
Others	%	3	3	3
Age				
20-29	%	N/A A 1 1 1	17.6	15.8
30-39	%	N/A. Age bracket has been reclassified 44.9	43	
40-49	%	since 2018. Data for 2017 can be found	31.3	34.1
50-59	%	in Digi Sustainability	6	7
> 60	%	Report 2017. 0.2		0.1
Other indicators				
% of women in leadership <sup>4</sup>	%	45	46	46
Employee Engagement Index (EEI) Score	%	74	78	80
Lost Time Injury Frequency 5	No/Million hours	0	0.27	0
% of employees under bargaining agreement	%	32.3	38.7	33
Average total training hours <sup>6</sup>	Hours	27.29	64	51.3
Employees that completed the "TDP Dialogue" and follow up $^{7}$	% of Employees	40	N/A	N/A
Turnover (Male) <sup>8</sup>	Numbers	160	166	122
Turnover (Female) <sup>8</sup>	Numbers	108	96	113

Up to CXO -2 level managers .

LTIF is based on 9 working hours x actual working days in a year (minus leave and public holidays) x number of employees

Based on total training hours divided by number of Digi permanent employees. For 2019, only online learning hours were accounted in.

No longer applicable since 2018.

This includes Digi employees, voluntary and involuntary resignation.

## **GRI TABLE**

GRI 101 Foundation	GRI 101 does not include any disclosures		
GRI 102 General Disclosures	Standard disclosure	Digi response	
Organisational Profile			
102-1	Name of the organisation	Digi.Com Berhad	
102-2	Activities, brands, products, and services	http://www.digi.com.my/aboutus/corporate_overview/information.html	
102-3	Location of headquarters	Lot 10, Jalan Delima 1/1, Subang Hi-Tech Industrial Park, 40000 Subang Jaya, Selangor, Malaysia	
102-4	Location of operations	Digi only operates in Malaysia.	
102-5	Ownership and legal form	Digi.Com Berhad Memorandum and Articles of Association	
102-6	Markets served	Digi Integrated Annual Report 2019 – Our Operating Landscape - p.16, Operational Review – p.39	
102-7	Scale of the organisation	Digi Integrated Annual Report 2019 – Our Operating Landscape - p.16, Financial Review – p.29, Operational Review – p.39 Digi Sustainability Data Book 2019 – Diversity and Inclusion, and Talent Development – p.21	
102-8	Information on employees and other workers	Digi Sustainability Data Book 2019 – Diversity and Inclusion, and Talent Development – p.21	
102-9	Supply chain	Digi Sustainability Data Book 2019 – Supply Chain Sustainability – p.29 Digi Suppliers Code of Conduct	
102-10	Significant changes to the organisation and its supply chain	Digi Sustainability Data Book 2019 – Service Reliability and Quality – p.11	
102-11	Precautionary Principle or approach	Digi Integrated Annual Report 2019 – Our Identified Key Risks – p.24	
102-12	External initiatives	As part of Telenor Group, Digi subscribes or endorses the following initiatives:  • UN Global Goals for Sustainable Development  • GRI  • CDP (formerly known as Carbon Disclosure Project)  • Principles of the World Economic Forum  • Business for Social Responsibility™	
102-13	Membership of associations	Business Integrity Alliance (BIA) Business Council for Sustainable Development (BCSD) Federation of Malaysian Manufacturers  As part of Telenor Group, Digi is a member of: GSMA  The Telecommunications Industry Dialogue, which has observer status in the GNI, and the Global e-Sustainability Initiative	

GRI 102 General Disclosures	Standard disclosure	Digi response
Strategy		
102-14	Statement from senior decision-maker	Digi Integrated Annual Report 2019 – Chair of the Board's Statement - p.8 Digi Integrated Annual Report 2019 – CEO's Statement - p.10 Digi Sustainability Data Book 2019 – Our View On Managing Sustainability - p.4
102-15	Key impacts, risks, and opportunities	Digi Integrated Annual Report 2019 – Our Emerging Opportunities – p.18, Our Identified Key Risks – p.24
Ethics & Integrity		
102-16	Values, principles, standards, and norms of behavior	Digi upholds the highest standards of corporate ethics for long-term value creation that contributes directly to improved business performance. Digi's strategy emphasises the need to maintain a culture that safeguards the responsible and sustainable business practices, built on a solid foundation of strong moral values and a deep sense of integrity. This is maintained by establishing a business environment with partners who share our commitment to high standards of ethics and integrity, and ensuring the right principles of anti-corruption, customer privacy, consumer responsibility, supply chain sustainability, and safe use of equipment are upheld across our business.  http://www.digi.com.my/aboutus/corporate_overview/governance.html
102-17	Mechanisms for advice and	Digi Sustainability Data Book 2019 – Ethics & Compliance – p.25
	concerns about ethics	
Governance		
102-18	Governance structure	Digi Integrated Annual Report 2019 – Corporate Governance Overview Statement - p.62 Digi Sustainability Data Book 2019 – Sustainability Governance - p.5
102-19	Delegating authority	Digi Corporate Governance – Terms of Reference – Board Charter and CEO Charter
102-20	Executive-level responsibility for economic, environmental, and social topics	Digi Sustainability Data Book 2019 – About Our Sustainability Data Book - p.2 Digi Sustainability Data Book 2019 – Sustainability Governance - p.5
102-21	Consulting stakeholders on economic, environmental, and social topics	Digi Integrated Annual Report 2019 – Our Key Relationships - p.20
102-22	Composition of the highest governance body and its committees	Digi Integrated Annual Report 2019 – Board of Directors' Profiles - p.54 Digi Integrated Annual Report 2019 – Corporate Governance Overview Statement - p.62
102-23	Chair of the highest governance body	Digi Integrated Annual Report 2019 – Board of Directors' Profiles - p.54
102-24	Nominating and selecting the highest governance body	Digi Integrated Annual Report 2019 – Corporate Governance Overview Statement - p.62
102-25	Conflicts of interest	Nil
102-26	Role of highest governance body in setting purpose, values, and strategy	Digi Senior Management Team undertake the responsibilities with regards to driving the purpose, values and strategy, and is directly involved in the day-to-day running and operational matters of the organisation.  Digi Integrated Annual Report 2019 – Management Profiles - p.59

GRI 102 General Disclosures	Standard disclosure	Digi response
102-27	Collective knowledge of highest governance body	Digi Integrated Annual Report 2019 – Nomination Committee Report - p.78
102-28	Evaluating the highest governance body's performance	Digi Integrated Annual Report 2019 - Nomination Committee Report - p.78
102-29	Identifying and managing economic, environmental, and social impacts	Digi Integrated Annual Report 2019 – Statement on Risk Management and Internal Control - p.70
102-30	Effectiveness of risk management processes	Digi Integrated Annual Report 2019 – Statement on Risk Management and Internal Control - p.70
102-31	Review of economic, environmental, and social topics	Digi Integrated Annual Report 2019 – Statement on Risk Management and Internal Control - p.70
102-32	Highest governance body's role in sustainability reporting	Digi Sustainability Data Book 2019 is reviewed and approved by Digi Management Team and Digi Board.
102-33	Communicating critical concerns	Digi Integrated Annual Report 2019 – Statement on Risk Management and Internal Control - p.70
102-34	Nature and total number of critical concerns	Nil
102-35	Remuneration policies	Digi Integrated Annual Report 2019 – Directors' Report – p.86
102-36	Process for determining remuneration	Digi Integrated Annual Report 2019 – Directors' Report – p.86
102-37	Stakeholders' involvement in remuneration	Nil
102-38	Annual total compensation ratio	Nil
102-39	Percentage increase in annual total compensation ratio	Nil
Stakeholder engageme	nt	
102-40	List of stakeholder groups	Digi Integrated Annual 2019 – Our Key Relationships - p.20
102-41	Collective bargaining agreements	33% of employees are covered by collective bargaining agreement as at 31 Dec 2019.
102-42	Identifying and selecting stakeholders*	Digi Integrated Annual Report 2019 – Our Key Relationships - p.20 * Partly referenced from our Sustainability Report 2018 as we conduct external stakeholder engagement survey once every two years.
102-43	Approach to stakeholder engagement*	Digi Integrated Annual Report 2019 – Our Key Relationships - p.20 * Partly referenced from our Sustainability Report 2018 as we conduct external stakeholder engagement survey once every two years.
102-44	Key topics and concerns raised	Digi Integrated Annual Report 2019 – Our Key Relationships - p.20
102-45	Entities included in the consolidated financial statements	Digi Integrated Annual Report 2019 – Audited Financial Statements – p.86 – p.99

GRI 102 General Disclosures	Standard disclosure	Digi response
102-46	Defining report content and topic Boundaries*	Digi Sustainability Data Book 2019 – Materiality and Our Stakeholders – p.8  * Partly referenced from our Sustainability Report 2018 as we conduct external stakeholder engagement survey once every two years.
102-47	List of material topics*	Digi Sustainability Data Book 2019 – Materiality and Our Stakeholders – p.8  * Partly referenced from our Sustainability Report 2018 as we conduct external stakeholder engagement survey once every two years.
102-48	Restatements of information	In 2019, Digi underwent a review exercise of the methodology used to calculate fuel consumption of our generators used to power equipment for our network, taking into consideration efforts to convert generator powered sites to the grid. Based on our review, we had estimated a higher reporting capacity in prior years. Towards this effect, we have restated our 2018 figures based on the changes in methodology used.
102-49	Changes in reporting	Nil
102-50	Reporting period	Calendar year 2019
102-51	Date of most recent report	Previous report published in 2019, covering calendar year 2018
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the report	Philip Ling Oon Hun E-mail: ohling@digi.com.my
102-54	Claims of reporting in accordance with the GRI Standards	GRI-referenced claims
102-55	GRI content index	Digi Sustainability Data Book 2019 – p.36
102-56	External assurance	Digi Integrated Annual Report 2019 – Verifying and assuring our data - p.157 An independent assurance of the content of this report has been done by KPMG PLT
GRI 103 Management Approach	Standard disclosure	Digi response
103-1	Explanation of the material topic and its Boundary	Digi's annual sustainability reporting is prepared in accordance to reporting guidance by Bursa Malaysia, UN Global Compact – Communication on Progress (COP) as well as Global Network Initiative (GNI) Guiding Principle and assessment. Sustainability performances are also disclosed in line with reporting frameworks such Global Reporting Initiative (GRI), CDP and UNGP Reporting Framework.  All material topics selected are relevant throughout our value chain. We have taken into account the following factors during Digi's materiality assessment process:  Reasonable economic, environmental, and/or social impacts identified through sound investigation with external expert bodies such as GSMA, GeSI, CDP, GNI, BSRTM and BCSD Malaysia.  The interests and expectations of stakeholders specifically invested in Digi such as employees and shareholders.  Broader economic, social, and/or environmental interests and topics raised by stakeholders such as regulators, suppliers, local communities, vulnerable groups, and civil society. Special attention has been given to United Nations Sustainable Development Goals.  Main topics and future challenges for the mobile and internet industry sectors, as identified directly by peers and representative organisations such as GSMA and GeSI Local laws and regulations, international agreements, or voluntary agreements of strategic significance to Digi and its stakeholders.  Digi's values, policies, strategies, operational management systems, goals, and targets.  Consequences for Digi which are related to its impacts on the economy, the environment, and/or society such as risks to Digi's business model or reputation.  We have also incorporated the Digi Board of Directors' suggestions on stepping up reporting on Privacy and Climate/Environment in our Sustainability Data Book.

GRI 103 Management Approach	Standard disclosure	Digi response
103-2	The management approach and its components	For Digi, the purpose of the management approach is to control major risks and opportunities for all material topics, regardless of whether they are financial or non-financial. Material topics are in principle governed in the same way as described in our approach to Corporate and Sustainability Governance in general. For commitment targets and actions on our material aspects, please see the relevant sections in our Sustainability Data Book 2019.
103-3	Evaluation of the management approach	Each material topic has a corresponding chapter in the Sustainability Data Book 2019.
GRI 200 Economic Performance	Topic-Specific disclosure	Digi response
201-1	Direct economic value generated and distributed	Digi Integrated Annual Report 2019 – Our Operating Landscape - p.16, Financial Review – p.29
201-2	Financial implications and other risks and opportunities due to climate change	Digi Integrated Annual Report 2019 – Our Operating Landscape - p.16, Our Identified Key Risks – p.24
202-2	Proportion of senior management hired from the local community	Digi Integrated Annual Report 2019 – Management Profiles - p.59
203-1	Infrastructure investments and services supported	Digi Integrated Annual Report 2019 – Financial Review – p.29
203-2	Significant indirect economic impacts	Digi Integrated Annual Report 2019 – Our Operating Landscape - p.16, Financial Review – p.29, Operational Review – p.39
205-1	Anti Corruption – Operations assessed for risks related to corruption	Digi's Anti-Corruption programme is initiated by providing capacity-building and regular training of employees. Our anti-corruption training ranges from e-learning programs, dilemma-training and other awareness activities. Digi's commitment
205-2	Anti Corruption - Communication and training about anti-corruption policies and procedures	towards integrity and transparency is clearly stated in Digi's Code of Conduct. The Code of Conduct is owned and approved by the Board, and all employees are required to sign it. Digi Sustainability Data Book 2019 – Ethics & Compliance – p.25
GRI 300 Environmental Performance	Standard disclosure	Digi response
302-1	Energy consumption within the organisation	For the indicators 302-1, 302-3 and 302-4; Digi's total energy consumptions for 2019 have been independently verified through a
302-3	Energy - Energy intensity	limited assurance by KPMG PLT*. Digi Sustainability Data Book 2019 – Climate Change and Environment – p.18
302-4	Energy - Reduction of energy consumption	
305-1	Emissions	For the indicators 305-1, 305-2, 305-3, 305-4 and 305-5;
305-2	Emissions	Digi's total GHG emissions for 2019 have been independently verified through a limited assurance by KPMG PLT*.
305-3	Emissions	Digi Sustainability Data Book 2019 – Climate Change and Environment – p.18
305-4	Emissions	
305-5	Emissions	
308-1	Supplier Environmental Assessment	We have included environmental sustainability as part of sourcing and screening of suppliers.

GRI 400 Social Performance	Standard disclosure	Digi response
403-1	Occupational Health and Safety – Occupational health and safety management system	Digi pioneered the adoption of ISO 45001:2018 Occupation Health and Safety Management System certification
403-5	Occupational Health and Safety – Worker training on occupational health and safety	Digi Integrated Annual Report 2019 – People and Workplace Modernisation – p.45
403-9	Occupational Health and Safety – Work-related injuries	For the indicator 403-9; Digi's Long Term Injury Frequency calculation for 2019 has been independently verified through a limited assurance by KPMG PLT*. There were no work-related employee or in-house contractor fatalities reported in Digi for 2019. Digi Integrated Annual Report 2019 – People and Workplace Modernisation – p.45
404-1	Training and Education – Average hours of training per year per employee	For the indicator 404-1; Digi's Employees' Training Hours for 2019 have been independently verified through a limited assurance by KPMG PLT*. Digi Integrated Annual Report 2019 – People and Workplace Modernisation – p.45
404-2	Training and Education – Programs for upgrading employee skills and transition assistance programs	Digi Integrated Annual Report 2019 – People and Workplace Modernisation – p.45
404-3	Training and Education – Percentage of employees receiving regular performance and career development reviews	All employees shall receive regular performance and career development reviews regardless of category and gender. This is a set requirement.
405-1	Diversity and Equal Opportunity - Diversity of governance bodies and employees	Digi Sustainability Data Book 2019 – Diversity and Inclusion, and Talent Development – p.21
408-1	Child Labor - Operations and suppliers at significant risk for incidents of child labor	We conduct a human rights due diligence, including risk mapping in these areas and practise a zero-tolerance stand should there be any violations. To ensure compliance among suppliers, this aspect is a key risk assessment criteria during pre contract, and
409-1	Forced or Compulsory Labor - Operations and suppliers at significant risk for incidents of forced or compulsory labor	an annual Self-Assessment Questionnaire (SAQ) are mandatory to be completed by all registered vendors

GRI 400 Social Performance	Standard disclosure	Digi response
412-1	Human Rights Assessment - Operations that have been subject to human rights reviews or impact assessments	Through Telenor Group and in collaboration with BSR™, we revisited our understanding of country risks, as well as exploring international trends and good practices for mitigation. We conduct yearly reviews and monitoring process on all related policies and manuals. Digi Sustainability Data Book 2019 – Human Rights – p.30
412-2	Human Rights Assessment - Employee training on human rights policies or procedures	
413-1	Local Communities - Operations with local community engagement, impact assessments, and development programs	For the indicator 413-1; The number of engagements for Digi's Yellow Heart Digital Resilience initiative for 2019 has been independently verified through a limited assurance by KPMG PLT*. Digi's community outreach programmes are geared towards reducing inequalities through digital resilience and citizenship, and enabling digital inclusion. Digi Sustainability Data Book 2019 – Digital Resilience – p.32
414-1	Supplier Social Assessment - New suppliers that were screened using social criteria	For the indicator 414-1; The number of new suppliers signing Digi's Agreement of Responsible Business Conduct (ABC) for 2019 has been independently verified through a limited assurance by KPMG PLT*. Digi evaluates the Supply Chain Principles (SCP) Risk for any existing or potential Supplier and/or its Sub Suppliers. 100% of new suppliers, numbering 111 were screened using labour practices criteria. Digi Sustainability Data Book 2019 – Supply Chain Sustainability – p.29
414-2	Supplier Social Assessment - Negative social impacts in the supply chain and actions taken	In 2019, 4 subcontractors were terminated for failing to meet our safety standards.  Digi Sustainability Data Book 2019 – Supply Chain Sustainability – p.29
417-2	Marketing and Labeling - Incidents of non-compliance concerning product and service information and labeling	Digi is not aware of any incidents or non-compliances concerning product and service information and labelling in 2018.
417-3	Marketing and Labeling - Incidents of non-compliance concerning marketing communications	Digi is not aware of any incidents or non-compliances concerning marketing communications in 2018.
418-1	Customer Privacy - Substantiated complaints concerning breaches of customer privacy and losses of customer data	Digi is not aware of any substantiated complaints regarding breaches of customer privacy and losses of customer data in 2018. Digi Sustainability Data Book 2019 – Data Privacy & Security – p.28

<sup>\*</sup>Assurance in accordance with International Standard on Assurance Engagements (ISAE) 3000, Assurance Engagements other than Audits or Reviews of Historical Financial Information and International Standard on Assurance Engagements (ISAE) 3410, Assurance Engagements on Greenhouse Gas Statements, issued by the International Auditing and Assurance Standards Board. Please view the Assurance letter under Digi Integrated Annual Report 2019 – Independent Limited Assurance Report - p.157

