

Respecting Human Rights and Freedom of Expression

Upholding human rights by mitigating the risk of potential abuse across our value chain and ensuring access to the right information.

Impact & Financial Assessment

Upholding human rights and freedom of expression in operations fosters a positive public image. Violations may lead to public backlash, legal actions, and damage to the company's reputation.

The financial implications depend on the severity of incidents and vary on a case-by-case basis and CelcomDigi should uphold the principles in the Malaysia Code on Corporate Governance.

Overview

CelcomDigi is committed to respecting human rights and freedom of expression. We strive to create an inclusive environment where all individuals are treated with dignity and respect. Our policies and practices are designed to uphold these principles and ensure that our operations do not infringe on the rights of any individual.

CelcomDigi's human rights requirements are based on the following international instruments: Universal Declaration of Human Rights (UDHR), International Covenant on Civil and Political Rights (ICCPR), International Covenant on Economic, Social, and Cultural Rights (ICESCR), and the principles concerning fundamental rights in the eight International Labour Organisation (ILO) core conventions as set out in the Declaration on Fundamental Principles and Rights at Work. The requirements reflect the Company's responsibility to respect human rights, in accordance with the UN Guiding Principles on Business and Human Rights, the Organisation for Economic Cooperation and

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Development (OECD) Guidelines for Multinational Enterprises, and the UN Global Compact.

Policies & Guidelines

- Code of Conduct
- Sustainability Policy
- People Policy
- Whistleblowing Policy
- Diversity, Equity and Inclusion Manual

Our Response

- Conducting human rights due diligence impact assessment every alternate year to identify, address, and manage human rights related risks and impacts resulting from our own activities and those in our value chain. The Business Partner Conduct Principles (BPCP) clearly stipulates the prohibition of forced and child labour, unsafe or life-threatening working behaviour, and poor working/living conditions for all partners and suppliers intending to have a business relationship with CelcomDigi.
- Following the higher standard when national law and international human rights law differ. If they are in conflict, CelcomDigi adheres to the national law while seeking ways to respect international human rights to the greatest extent possible.
- Engaging with stakeholders to understand and address human rights issues

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CelcomDigi's Human Rights Due Diligence Process

Our process aligns with the UNGPs on Business and Human Rights, UN Global Compact's Ten Principles, and the Global System for Mobile Communications (GSMA) Human Rights Guidance. The process encompasses:

Identifying actual and potential human rights risks

Prioritising issues based on risk severity and impact

Implementing effective mitigation plans

Transparently communicating with stakeholders

Human rights issues identified as relevant to CelcomDigi in descending order:

Top five human rights issues

- 1. Privacy and data security
- 2. Internet fraud and scam risk
- 3. Worker wellbeing and safe working environment
- 4. Corruption and bribery
- 5. Use and impacts of disruptive technologies

Other human rights issues

- 6. Data access and interception of legal authority requests
- 7. Environmental and infrastructure impacts
- 8. Freedom of expression, association and assembly
- 9. Online speech and offline harm
- 10. Child safety online
- 11. Non-discrimination and equity
- 12. Working conditions: wages, hours and benefits
- 13. Modern slavery, forced labour and child labour
- 14. Human trafficking (including child trafficking)
- 15. Access to education
- 16. Collective bargaining and freedom of association
- 17. Grievances and remedies
- 18. High-risk and conflict-affected contexts
- 19. Digital inclusion

How do we address key Human Rights risks?

In addition to human rights risks that closely align with the GSMA's top seven issues, which highlight key sector-specific challenges, we also prioritise issues unique to our operations. Our approach is driven by international best practices and a commitment to ongoing improvement.

Data privacy and freedom of expression



Protecting user data and upholding freedom of expression are fundamental to our operations. Our robust governance framework, encompassing policies, procedures and technological safeguards, ensures the security and privacy of all personal data, in alignment with relevant Malaysian regulations.

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• Child rights and safety online

We actively partner with government agencies and civil social organisations in our S.A.F.E. Internet programme contributing to public awareness and education on online child safety. We are also actively exploring further initiatives to enhance our efforts in this area.

 Modern slavery, forced labour and child labour and human trafficking (including child trafficking)

Our zero-tolerance commitment is embedded in our company policy, actively monitored through rigorous supply chain due diligence, regular audits and inspections. Our robust policies and management systems – Business Partner Conduct Principles (BPCP), Agreement of Responsible Business Conduct (ABC), CelcomDigi Permit to Work (CDPTW) – prevent and mitigate these serious human rights risks. We are committed to continuous improvement in supply chain transparency and ethical sourcing practices.

Community impacts from infrastructure

We recognise the importance of minimising the environmental and social impact of our infrastructure projects. Our land-leasing practices incorporate strong governance to ensure responsible development and minimal disruption to local communities and their legal rights.

Conflict mineral standards

Our business model, focused on telecommunications services rather than direct extraction of raw materials, significantly reduces our direct exposure to conflict minerals. However, we remain vigilant in our supply chain due diligence to ensure that our indirect exposure is also minimised. We are committed to responsible sourcing practices and will continue to monitor this area.

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Internet fraud and scam risk, corruption and bribery

We have established dedicated enterprise risk management programmes to proactively identify, assess and mitigate these threats. These programmes include robust internal controls, employee training and collaboration with relevant authorities, and oversight by the senior management team of the company.

Use and impacts of disruptive technologies

We prioritise the assessment and mitigation of potential human rights impacts associated with disruptive technologies such as artificial intelligence, data analytics and other emerging technologies. This includes ongoing monitoring and stakeholder engagement.

GSMA

Represents sector-specific human right risks covered in GSMA Human Rights Guidance for the Mobile Industry

How do we promote employees' freedom of association?

We are committed to Freedom of Association and Collective Bargaining. This is managed through Labour and Employee representation via the Union. The Union is formed through a democratic process by election of representatives across CelcomDigi.

How do we address authority requests?

Telecommunications is a tool that generally contributes to freedom of expression. On some occasions, authorities may have legitimate needs to require telecommunications companies to comply with requests that limits free communication. This may typically be the case if authorities must address societal needs, such as national security. Such requests shall be handled in accordance to the Authority Request Manual that supports implementation of the principles in accordance to national laws and regulations and respects human rights.

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