



LET'S INSPIRE



# SUSTAINABILITY PERFORMANCE 2021



**Yellow Heart**  
A Digi Initiative



# Inside This Report

## OUR VIEW ON MANAGING SUSTAINABILITY

Yellow Heart	3
Our Responsible Business Framework	4
Sustainability Governance	4
Guiding Standards	5
Contribution to the SDGs	5

## OUR COMMITMENT TO ESG

Digi's ESG-Related policies and manuals	8
---	---

## ENVIRONMENT

Climate Action	
Strengthen controls on climate data management and reporting	10
Managing our environmental footprint	11
Network modernisation and cleaner energy innovations for sustainable growth	13
Sustainable Workplace	14
Other initiatives	
- Digi Yellow Heart #MYBAIKHATI	14
- Net Zero Pathway for Malaysia 2050 Report	15
- CEO Action Network	15
- Electromagnetic and Radiation Safety	15

## SOCIAL

People	
- #FreedomtoInspiretheNext	16
- Diversity and Inclusion (D&I)	17
- Learning and Development	18

- Health and Safety	18
- Engagement Survey	19

Human Rights	
- Human Rights issues most salient for Digi	20
- Human Rights Due Diligence	20
- Grievances	22
- Labour Rights	22
- Responsible Marketing & Labelling	22

Digital Inclusion & Corporate Citizenship	
- Nation Building Initiatives	22
- Accelerating Businessess and SME's Digitalisation	24
- Empowering Educators and Youth for the Future	24

## GOVERNANCE

Supply Chain Sustainability	27
Compliance and Anti-Corruption	28
Data Privacy and Cyber Security	30

GRI DATA	32
----------	----

GRI TABLE	35
-----------	----



Scan this QR Code for Sustainability Performance Website



## Chapter 1: Our View on Managing Sustainability

Responsible Business is 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.



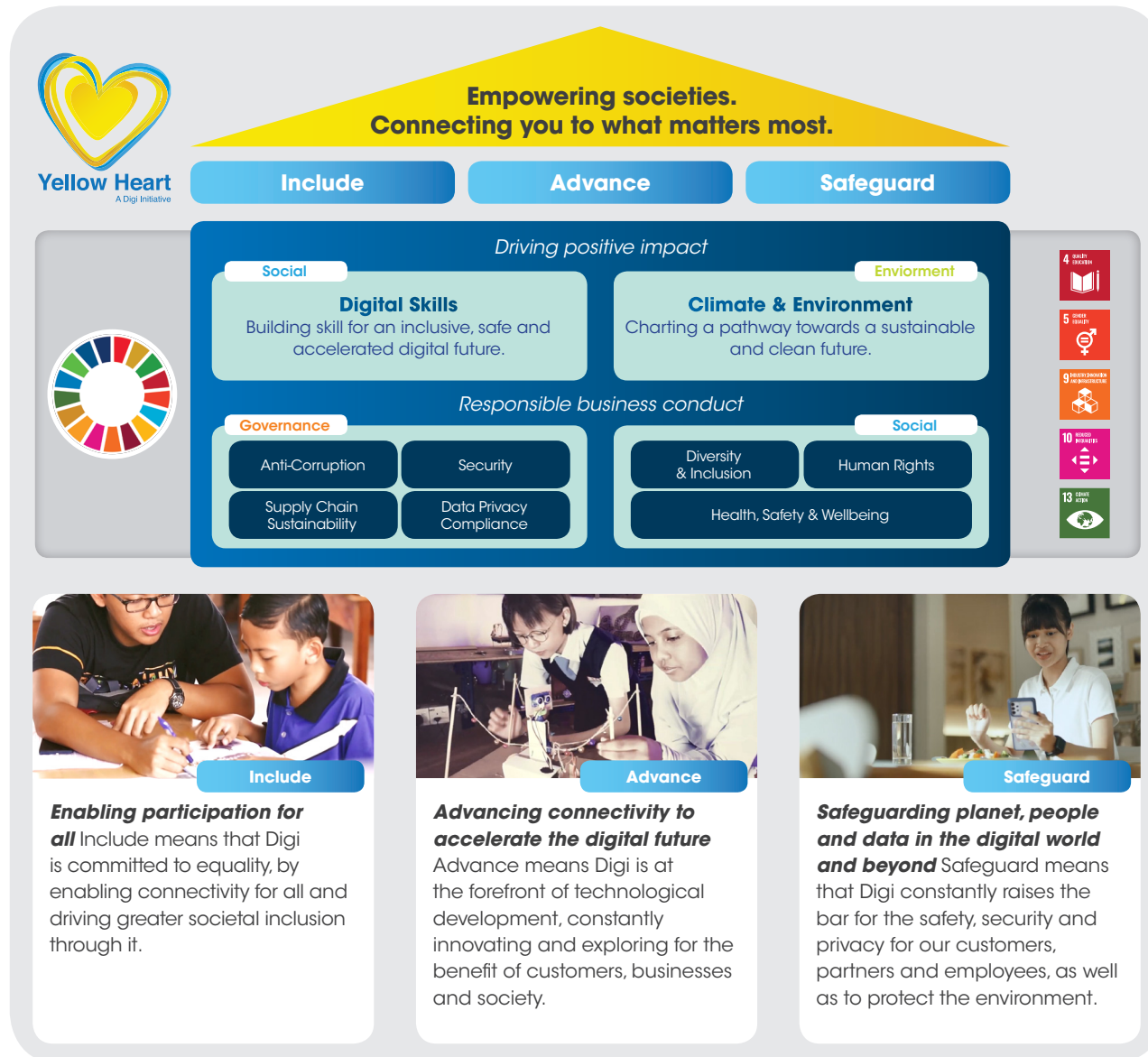
Our Strategy



### YELLOW HEART: OUR RESPONSIBLE BUSINESS COMMITMENT

Yellow Heart is our sustainability brand promise to our customers and stakeholders, and it reflects our commitment to bring 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 societal impact. This belief guides us in everything we do, bringing us closer to what matters most to customers, communities and businesses.

# Chapter 1: Our View on Managing Sustainability



## OUR RESPONSIBLE BUSINESS FRAMEWORK

Digi takes a holistic approach to address sustainability and responsible business, embedding it into everything we do. Our role remains to include and enable opportunities for people, advance and safeguard communities through our services and engagements, while continuing to raise responsible business standards across our operations.

In 2021, we updated our Responsible Business framework for better alignment to Digi's purpose and global identity as part of Telenor Group. Our purpose is 'Empowering Societies – Connecting you to what matters most'. The Responsible Business strategy, key to delivering on this purpose is guided by three key areas: Include, Advance, and Safeguard.

## SUSTAINABILITY GOVERNANCE

Sustainability governance remains a priority across the company as our corporate governance principles and practices define a framework of rules and procedures for the way business is governed and controlled. Our governance framework is used as a platform to integrate material sustainability issues into our business strategies, daily operations and relationships with stakeholders.

*To learn more on how we embed Sustainability within Digi's overall governance structure, please see pages 96-97 of Digi Integrated Annual Report 2021.*

*To learn more on Digi's Material Matters, please see pages 38-40 of Digi Integrated Annual Report 2021.*



# Chapter 1: Our View on Managing Sustainability

## GUIDING STANDARDS

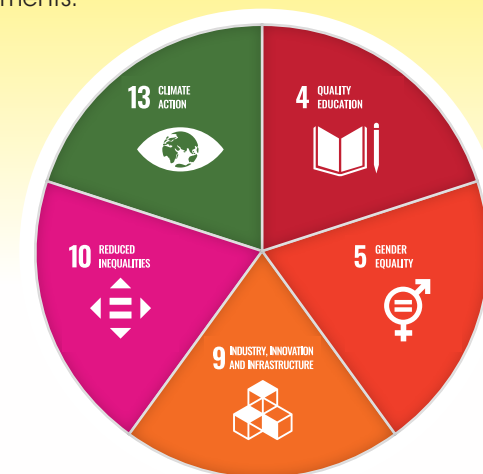
The table below depicts some of the key standards and guiding principles that Digi adheres to within the different Responsible Business areas.

AREA	STANDARDS / GUIDING PRINCIPLES
<b>Climate and Environment</b>	GHG Protocol   United Nations Framework Convention on Climate Change (UNFCCC)   ISO14001:2015   Science Based Targets (Committed)   UNGC
<b>Human Rights</b>	United Nations (UN) guiding principles on business and Human Rights   International Labour Organization (ILO)   UNGC
<b>Diversity &amp; Inclusion</b>	UN Women Empowerment Principles   Code of Conduct
<b>Health, Safety, People Security and Wellbeing</b>	ISO 45001   ILO Fundamental Principles and Rights at Work
<b>Supply Chain Sustainability</b>	ILO   Agreement on Responsible Business Conduct   Supply Chain Principles (SCPs)
<b>Anti-corruption</b>	ISO 37001 Anti Bribery Management   UNGC
<b>Data Privacy Compliance</b>	Personal Data Protection Act 2010
<b>Cyber Security</b>	Business Continuity Management System ISO 22301:2019

## CONTRIBUTING TO THE SDGs

We continue to evolve our services, operations, and targets as guided by the United Nations Sustainable Development Goals (SDGs). Digi is committed to all 17 SDGs. Over the years, we had a focus on Reducing Inequalities (SDG 10) realising the positive impact that we could potentially contribute as an enabler of connectivity and digital services. In 2021, as part of Telenor Group, we grew on our ambitions and expanded our focus to five goals where we believe it can have the most impact.

We are committed to provide sustainable, innovative, and resilient infrastructure (SDG 9 and SDG 13). Through our services and programmes, we empower societies by reducing inequalities (SDG 10), drive inclusivity (SDG 5), and accelerate development and delivery of quality education (SDG 4). These 5 SDGs form the foundation of Digi's global commitments.



## Chapter 2: Our Commitment to ESG

**Digi's responsible business framework is anchored on its 'Yellow Heart' brand aspirations: to raise standards across its operations and supply chain, and to partner effectively to build skills and resilience for an accelerated digital future.**

We continue to maintain the highest standards of ethics and integrity in our business conduct. Initiatives include developing a future-ready workforce, safeguarding the health, safety and wellbeing of our people and partners, being environmentally responsible in our operations, protecting the privacy of our customers, and reducing inequalities for society.





## Chapter 2: Our Commitment to ESG

# #1 Malaysian telco for ESG standards and performance

ESG is a fundamental aspect within our Responsible business strategy. We are a constituent of the FTSE4Good Bursa Malaysia Index and benchmark ourselves against Sustainalytics's ESG risk rating (in which we are at the 18th percentile, being one of the highest in the region). We have also voluntarily disclosed our climate data to CDP via Telenor Group. Key highlights demonstrating our strong commitment in subscribing to ESG standards and performance are summarised below.



FTSE4Good

**Bursa Malaysia Index**  
Member of ESG indices  
with score of 3.8



SUSTAINALYTICS

**ESG Risk Rating**  
**18<sup>th</sup> percentile**, one of the  
highest for the region



**Voluntary environmental disclosure**  
**Carbon reporting since 2009**  
via Telenor Group

MSCI  
ESG RATINGS



CCC B BB BBB A AA AAA

**MSCI ESG Rating (2021)**  
Improved rating from A  
to AA



**Bloomberg Gender Equality Index (GEI) 2021**  
Recognition in **gender reporting** and advancing  
**women's equality**



Award nominee  
South East Asia 2021

magazine

**Investor Relations Magazine SEA Awards**  
Certificate of Excellence for **Best ESG Materiality Assessment** in  
Integrated Annual Report 2020



**Corporate membership to drive leadership in gender diversity**  
Member of **UN Women Empowerment Policies and Malaysia's 30% Club**



**UN Women Malaysia WEPS Awards 2021**  
2<sup>nd</sup> Runner Up in the  
**Gender-inclusive Workplace Category**

## Chapter 2: Our Commitment to ESG

### DIGI'S ESG-RELATED POLICIES AND MANUALS

We work closely with Government agencies, Regulators and Policy Makers to develop our policies and manuals, guided by key statutory provisions, best practices and guidelines to ensure highest ethical practices and standards in all aspects of our business. Listed below are our ESG (Environmental, Social & Governance)-related policies and manuals. These policies and manuals are accessible for internal reference only.

ENVIRONMENT	SOCIAL	GOVERNANCE
<b>Sustainability policy*</b>	<b>Sustainability policy*</b>	<b>Sustainability policy*</b>
Climate and Environment manual	Business Environment Management manual*	Anti-corruption policy
Environment Management System manual	Crisis Management manual	Anti-corruption manual and handbook
E-waste and Recycling manual	Development and Performance process manual	Authority Request manual
Responsible Business Reporting manual*	Diversity and Inclusion manual	Business Partner Management Policy
	Health, Safety and People Security policy and manual	Delegation of Authority policy
	Human Rights due diligence manual	Integrity Due Diligence Business Partners manual
	People policy	Legal policy
	Responsible Business Reporting manual*	Privacy policy and manual
	Sponsorship, Donations and/or other Contributions manual*	Procurement policy and manual
	Sustainability Partnerships manual	Responsible Business Reporting manual*
	Travel Risk Management manual	Risk Management policy and manual
		Security policy and manual
		Suppliers Code of Principles
		Whistleblowing policy

(\* indicates that content in policy/manual addresses multiple related areas in the ESG categories)



## Chapter 3: Environment

Climate risk has become an important global topic demanding for businesses to adapt and respond with strategies to reach net zero carbon economy. The government has committed to reducing the intensity of greenhouse gas (GHG) emission across the economy by 45% based on GDP in 2030 and reach net zero by 2050 with new economic instruments such as a comprehensive national energy policy, carbon pricing and energy reforms. In actively managing our own relatively low exposure to natural capital risks, we are also often seen as part of a solution as we support a larger community of businesses to manage their risks through our digital services and connectivity solutions.

### Governance

Environmental Sustainability is embedded into our business operations and addressed 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 manage environmental responsibilities in a systematic manner with an Environmental Management System (ISO 14001:2015) including the proper management of waste, water and e-waste.

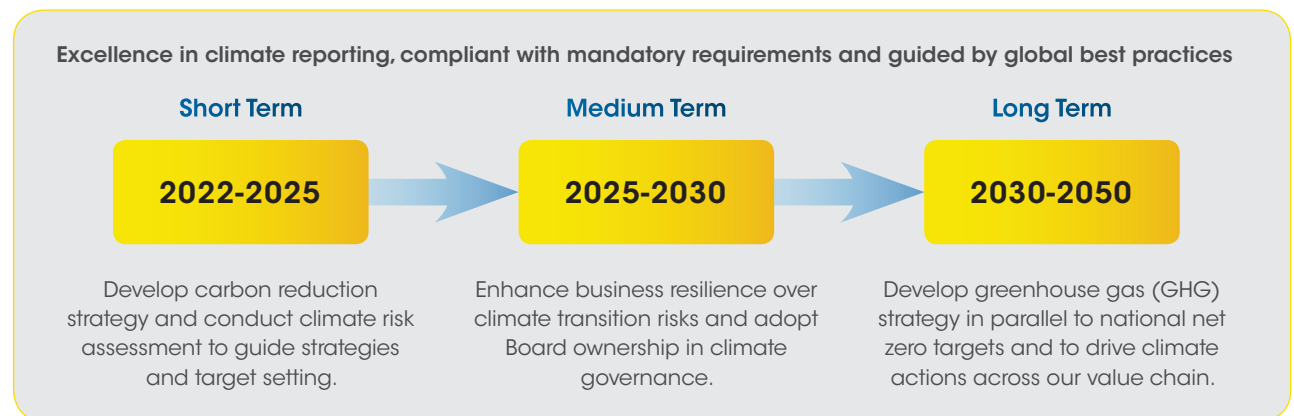
### Initiatives & Performances

- Emission reduction strategies with operational efficiencies, network modernisation, clean energy adoption and e-waste management.
- Innovative digital solutions to help corporate and SME customers better manage their own carbon emissions.
- Mitigate anticipated future physical climate risks such as extreme weather and floods by adapting solutions on network and tower site.
- Nominated as a steering committee member in CEO Action Network (CAN), a coalition of leaders with the purpose to shape policies and create a favourable ecosystem for sustainable development in Malaysia.
- Drive eco-practices in the workplace.

### CLIMATE ACTION

Digi recognises the global threat of climate change, thus we have put in considerable efforts in reducing our carbon footprint in line with the government's target of reducing the intensity of greenhouse gas (GHG) emissions across the economy and reaching net zero by 2050. Over the years, we have been recognised as a leader among Malaysian telcos for thought leadership and consistent climate action. Our ranking is reflected in various leading global ESG indices (e.g. Sustainalytics, MSCI) and BURSA's FTSE4Good index.

The Climate roadmap (illustrated below) aims to continue the momentum through communicating on our short to long term plans towards net zero. While we anticipate challenges in large scale carbon reductions due to our dependency on the national grid, we will continue to strengthen our governance and reporting mechanisms while exploring new technologies and solutions.



## Chapter 3: Environment

### Short Term (2022-2025)

In the short-term (2022-2025), the key focus is to continue our efforts to reduce our carbon emissions (Scope 1, 2, 3), ensure high quality climate reporting, conduct a climate risk assessment for better guidance towards making informed decisions on strategies and target setting. Digi plans to conduct a climate risk assessment following the Recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD). This will enable us to develop strategic plans that are more robust to assess potential business implications of climate-related risks and opportunities. Digi aspires to register a localised science-based targets for 2030 and Net Zero ambitions for 2050. In tandem, Management shall continue to prioritise climate governance via policies and clear roles and responsibilities building towards the medium and long-term ambitions.

### Medium Term (2025-2030)

In the mid-term (2025-2030), we aim to mature our climate strategy to achieve Carbon Neutrality (CO<sub>2</sub>) and focus on enhancing business resiliency over climate risks and mitigate transitional risks. This will include implementing full TCFD recommendations to integrate climate-related risks and opportunities into business strategy and financial disclosures. The opportunities will guide our continued investment towards achieving low-carbon in our operations and supply chain. We aim to strengthen leadership and management ownership in climate governance, risk & opportunities, strategy and targets. In parallel, we plan to establish an internal shadow pricing mechanism in anticipation of carbon pricing introduction by the government. Some of these initiatives might even be implemented earlier, where possible.

### Long Term (2030-2050)

In the long-term (2030-2050), we shall go beyond addressing carbon emission to address all Greenhouse Gas (GHG) emissions with reduction strategies and targets as we expect more commercially available green technology and systemic solutions in line with Malaysia's Net Zero commitment. Our Climate Neutrality (GHG) strategy will include partnering suppliers and cross-industry efforts to jointly address our shared climate emissions across our value chain. We aspire to continue to lead the industry via our adoption of international best practices in business and being a preferred brand offering climate-friendly products and services.

### Strengthen controls on climate data management and reporting

Digi has developed a criterion for accounting and reporting its climate and greenhouse gas emissions, and has developed and maintains an efficient Environmental Management System (EMS) in accordance to ISO 14001:2015. Digi discloses its climate impacts, energy and GHG emissions via Telenor Group to the CDP global disclosure system. Since 2020, Digi discloses its emissions data through its Integrated Reporting process. Digi adopts the following principles as part of its GHG emission management;

- Define the scope and boundary
- Identify the GHG emission sources
- Collect and quantify GHG emissions
- Set emission reduction objectives and prepare action plans
- Involve employees, suppliers and conduct trainings
- Implement emission reduction initiatives

In 2021, Digi embarked on a Climate Data Integrity exercise with guidance from an independent advisor to better improve on its carbon and energy management and reporting standards for Scopes 1, 2 and 3. The exercise comprise identifying gaps and mapping data flows for each of the climate data stream owners – Network, Building and Transportation, as well as strengthening internal controls to ensure integrity of Digi's reported climate data. The six months initiative resulted in the development of new formalised data templates, with embedded calculations and estimations so as to minimise human errors. The data templates also presents automated historical and future projections that will allow the team to better perform trend analysis and to make informed decision. The respective data stream owners have begun populating the templates with 2021 data and will be the standardised template used moving forward.



## Chapter 3: Environment

### Managing our environmental footprint

Digi monitors and reports Scope 1 and 2 GHG emissions covering all its assets - both owned and leased, that includes offices and buildings (headquarters and regional), retail touchpoints, technology centres, network sites and vehicles within its operational control. Under Scope 3, only GHG emissions related to employee business travels are accounted for and does not include other aspects under the company's operational value chain. As part of our climate action roadmap, we will conduct a comprehensive screening over the company's GHG emissions impacts across the 15 categories under Scope 3 (Refer to Figure A1-2)

Figure A1-1: Scope 1, 2 and 3 GHG Emissions

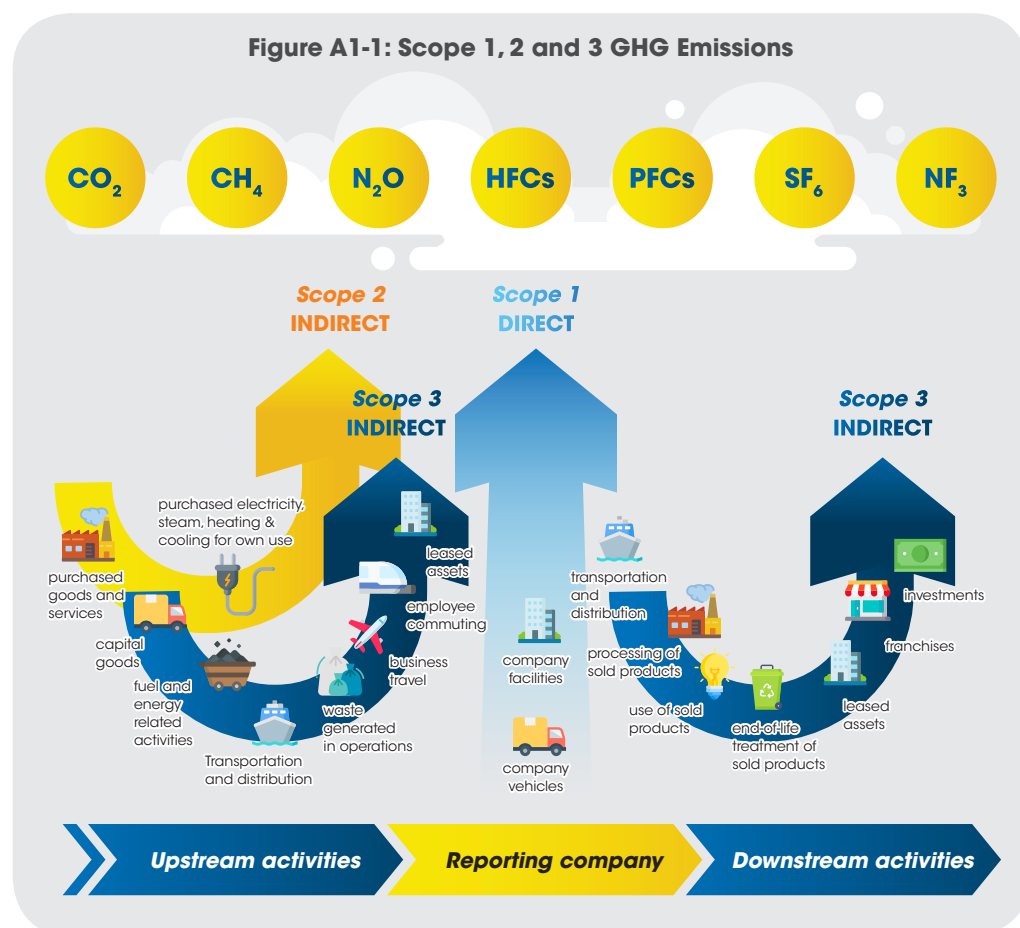


Figure A1-2: 15 categories of Scope 3 emissions

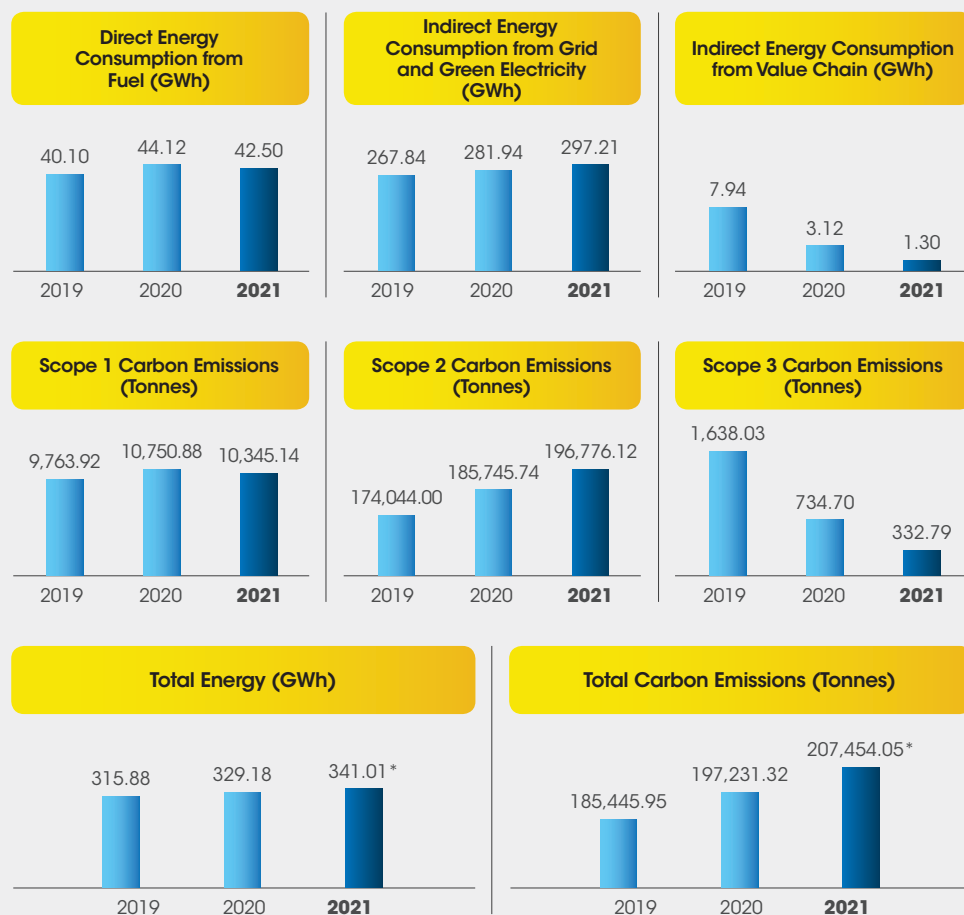
Upstream or Downstream	Scope 3 Category
Upstream scope 3 emissions	<ol style="list-style-type: none"> <li>1. Purchased good and services</li> <li>2. Capital goods</li> <li>3. Fuel and energy-related activities (not included in scope 1 or scope 2)</li> <li>4. Upstream transportation and distribution</li> <li>5. Waste generated in operations</li> <li>6. Business travel</li> <li>7. Employee commuting</li> <li>8. Upstream leased assets</li> </ol>
Downstream scope 3 emissions	<ol style="list-style-type: none"> <li>9. Downstream transportation and distribution</li> <li>10. Processing of sold products</li> <li>11. Use of sold products</li> <li>12. End-of-life treatment of sold products</li> <li>13. Downstream leased assets</li> <li>14. Franchises</li> <li>15. Investments</li> </ol>

(Reference: GHG Protocol, Corporate Value Chain (Scope 3) Accounting and Reporting Standard, 2011)

## Chapter 3: Environment

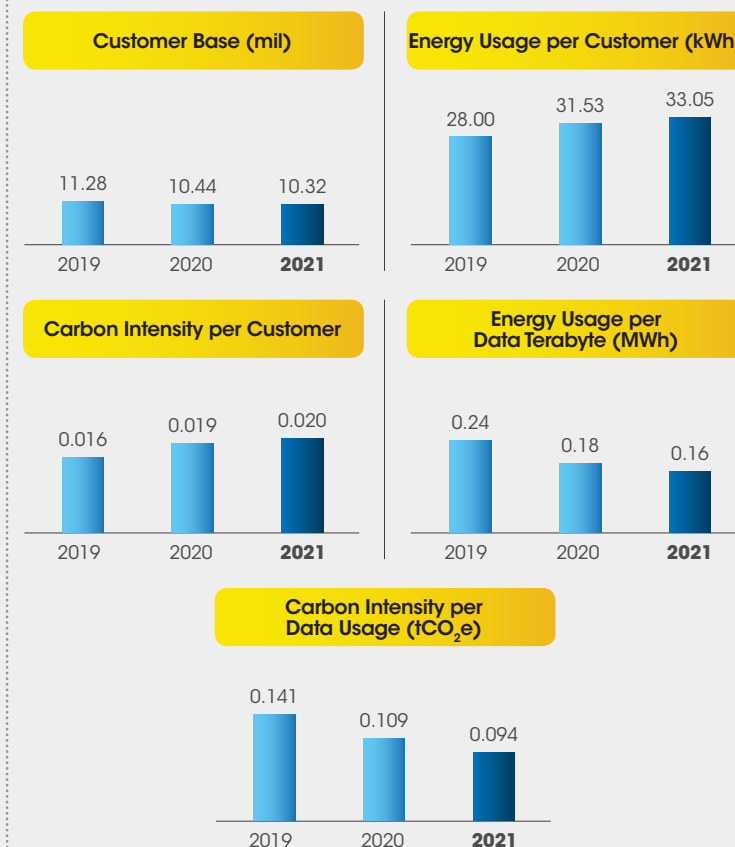
### Managing our environmental footprint

In 2021, to meet rising consumer demands, our carbon emission increased by 5%, attributed to data growth and network expansion. Our annual greenhouse gas (GHG) emissions inventory FY2021 in accordance to the GHG Protocol Corporate Standard are as follows:



Digi restated our climate data for 2019-2020 following the outcome of a Climate Data Integrity exercise undertaken with an independent advisor to improve our methodology in data collection and management approach. Corrective measures have been undertaken to ensure consistency, accuracy and transparency of the data presented here, in line with good climate governance practices.

During the year under review, we have improved on our Carbon Intensity per Data Usage by 13.7% YoY. We have achieved a lower carbon footprint per unit of data consumed, although the average customers are using more data. Our carbon intensity is measured by tonnes of CO<sub>2</sub> (tCO<sub>2</sub>e) per terabyte of data.



\* Total energy consumption and carbon emissions FY2021 has been independently assured by KPMG PLT

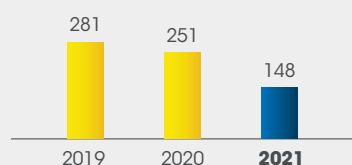


## Chapter 3: Environment

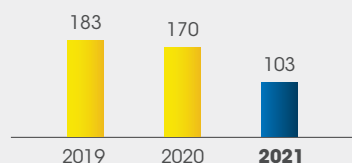
### Managing our environmental footprint

#### General waste

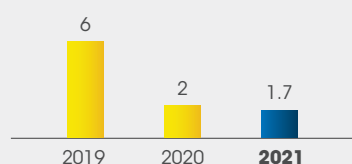
##### Waste Collected (tonnes)



##### Waste Generated per Employee (KG)<sup>1</sup>

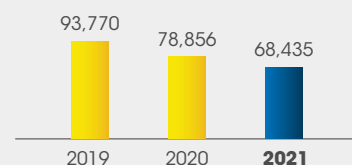


##### Waste Recycled (tonnes)

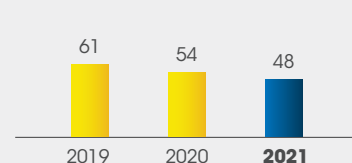


#### Water consumption

##### Water Consumed (m<sup>3</sup>)



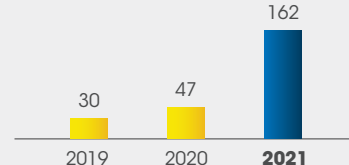
##### Water Consumed per Employee (m<sup>3</sup>)<sup>1</sup>



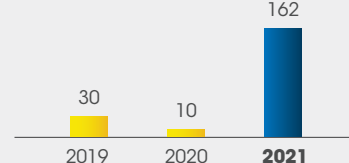
<sup>1</sup> total employees -1,438

#### E-waste (obsolete electrical and electronic waste)\*

##### E-waste Collected (tonnes)



##### E-waste Resold and Recycled (tonnes)



- E-waste directly produced from our operations are managed under the Environment Quality (Scheduled Wastes) Regulation 2005 and our internal guidelines
- 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 off safely by a licensed vendor
- Under our refreshed ESG guidelines, Recycled shall include e-waste treated by professional service provider who guaranteed that the waste is processed, sorted, resold, recycled or disposed in an environmentally sound manner

#### Network modernisation and cleaner energy innovations for sustainable growth

Since the movement control order (MCO) began in March 2020, Digi has seen an exponential increase of data usage. With more data being transferred across the network, demand for energy is increasing, putting pressure on our energy consumption and carbon reduction targets. While energy costs are a significant proportion of our Operating Expenditure (OpEx), it is also an area with many opportunities for OpEx savings with targeted Capital Expenditure (CapEx) on energy efficiency measures.



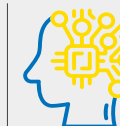
**31**

Fuel powered  
off-grid sites  
converted to grid  
power



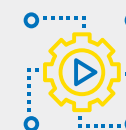
**15**

Off-grid sites on  
hybrid with lithium-  
ion battery



**102 sites**

CSON<sup>1</sup> AI pilot  
initiative



**> 4000 sites**

Site Battery Autonomy  
Prediction Tool<sup>2</sup> to reduce  
downtime and drive  
greater efficiencies



**3G Sunset**

Progressive efforts to shutdown  
remaining 30 Core Base  
Station Control (BSC) and  
41 Radio Network Controller  
(RNC) in 2022

## Chapter 3: Environment

### **1<sup>st</sup> CSON AI initiative**

In 2021, Digi worked with ZTE through the Centralised Self Organising Network (CSON) Artificial Intelligence (AI) pilot initiative, deploying tools to automatically analyse and implement power-saving mode at our Radio Access Network (RAN) sites. 102 sites were involved in the pilot over the course of a month and demonstrated 3.77% energy reductions (kWh consumed) per site, on average. We will be taking a phased approach in scaling the initiative, targeting to equip more than 50% of our sites to be equipped with this capability in 2022.

### **2<sup>nd</sup> Site Battery Autonomy Prediction Tool**

The 'Site Battery Autonomy Prediction Tool' is another AI-based initiative deployed to automatically monitor and record usage information of backup batteries at Digi's network sites. This information is crucial for timely sites restoration and battery replacements planning to ensure minimal service disruptions.

### **SUSTAINABLE WORKPLACE**

Digi's headquarters and Technology and Operations Centre (TOC) has been accredited with Gold certification by LEEDs in 2017, and by Green Building Index (GBI) in 2012 and 2016 respectively. We will continue to monitor and maintain high quality and healthy work spaces to boost productivity, optimise energy usage and implement responsive heating and cooling measures.

In adherence to LEEDs standards, we have embarked on the following energy efficiency and conservation efforts in 2021.

- Replaced old Air-Cooled chiller to a higher efficiency model, resulting in 50% reduction in energy use (from 1.2 kW/RT to below 0.6kW/RT)
- Optimised office facility setting to cater to lower demand due to remote working and work-from-home (WFH) arrangements, resulting in 15.6% reduction (savings of up to 1,015,000 kWh)
- Other energy conservation efforts include;
  - Balancing of chiller load and chilled water balancing
  - Heating, ventilation, and air conditioning (HVAC) temperature setting and scheduling
  - Lighting setting and scheduling

### **OTHER INITIATIVES**

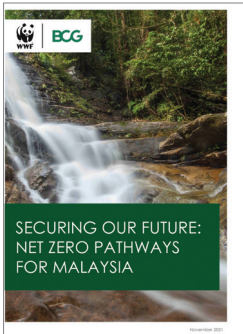
#### **Digi Yellow Heart #MYBAIKHATI**



We took part in an industry-led effort organised by MCMC, to crowdsource used devices including laptops, refurbish and donate it back to students in need. For this purpose, Digi provided the service of picking up the used devices from the donor's location besides making several Digi stores as drop-off points. Donated devices were sorted for refurbishment and unusable ones will be recycled as e-waste. In addition to this, we also committed Prepaid NEXT starter packs and recurring reloads, to be given out complimentary to communities in need to facilitate their digital learning needs.

## Chapter 3: Environment

### Net Zero Pathways for Malaysia 2050 Report



Digi supported WWF Malaysia and BCG Malaysia, and provided telecommunications specific insights in the development of the study on **Net Zero Pathways for Malaysia 2050**.

This report is meant to catalyse stronger and more cohesive climate action amongst all stakeholder groups. Digi will continue to collaborate with WWF Malaysia and BCG Malaysia, delving deeper into industry specific topics.

The report is available at [www.wwf.org.my/our\\_work/climate\\_and\\_energy/towards\\_net\\_zero\\_emissions\\_by\\_2050/](http://www.wwf.org.my/our_work/climate_and_energy/towards_net_zero_emissions_by_2050/)

### CEO Action Network



As a member, we are committed to engage with various stakeholders including our supply chain, regulators and policy makers, government, as well as our peers across various sectors to forge partnerships that are committed to responsible business practices and sustainable development.

In 2021, Digi, CAN and Climate Governance Malaysia (CGM) organised a Telco CEO Roundtable with six CEOs for conversations and sharing on various climate initiatives, challenges and aspirations to decarbonise the mobile sector.



Digi is a steering committee member in the CEO Action Network (CAN) which is a closed door peer to peer informal network of over 50 corporate CEOs and Board members, focused on sustainability advocacy, capacity building, action and performance.

To learn more about CAN, visit <https://www.ceoactionnetwork.com/>

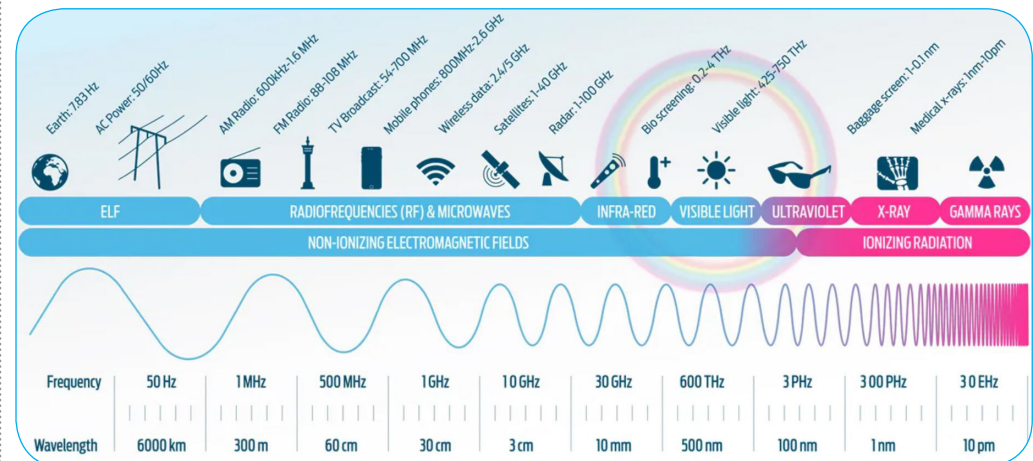
### Electromagnetic and Radiation Safety Programs

Mobile phone networks and other wireless communications sources emit low-level radiofrequency (RF) electromagnetic energy (EME). There has been concerns arising on the effects of EME, particularly with the growth of 5G, Internet of Things (IoT) and wearable devices.

Digi continues to work strictly in accordance with the guidelines provided by national regulations and the science based International Commission on Non-Ionizing Radiation Protection (ICNIRP) for network equipment and mobile phones sold through Digi.

Furthermore, Digi will maintain its public education and transparency efforts to keep public informed about the scientific facts related to radio waves and its radio base stations. This is often done through programmes in collaboration with the relevant authorities and/or regulators. Further information on facts and the guidelines that we adhere to can be found here:

<https://www.telenor.com/sustainability/responsible-business/safe-services/mobile-phones-and-health>



## Chapter 4: Social

As the nation continues to recover from the impact of the COVID-19 pandemic, Digi in support of the national sustainable development agenda continues to deepen its responsible business commitments in empowering societies towards reducing inequalities.

### PEOPLE

Digi is committed to high standards to serve our customers credibly, to care for our employees, and supply chain. We respect human and labour rights, including adopting best practices in health, safety and security for our employees and partners, both within our operations and supply chain. Additionally, we aim to attract and retain the best talent through learning and development programmes while strengthening our commitment to building a diverse and inclusive workplace.

### 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 is further broken down to Employee Experience, Learning & Development, Employee Benefits, Talent Recruitment and Diversity & Inclusion, led by line managers who oversees the respective portfolios.

### Initiatives & Performances

- Developing a future-ready workforce through continuous upskilling
- Provide access to physical, mental health and wellbeing support to employees of all levels
- Promote advanced mindset and culture on health and safety for employees and business partners

### #FreedomtoInspiretheNext

With the employer brand promise of '**Freedom to Inspire the Next**', we aim to ensure that Digi is a workplace where employees have the freedom to chart their own growth story. Collectively, we term it as the 'Digizen Experience' and this is based on 4 pillars (Freedom): to Grow, to Innovate, to Care, and to Engage.





## Chapter 4: Social

### Diversity and Inclusion (D&I)

Digi is committed towards creating a diverse and inclusive workforce, anchored on the 'Freedom to Engage' pillar. Going beyond gender balance, age or ethnicity, we employ diversity across all people related matters such as recruitment, selection, promotion, and retention strategies. By providing equal access and flexibility to engage with one another and the resources that they need, we believe this could strongly nurture a collaborative environment that enables employees to contribute their best.

#### Our diverse and inclusive organisational demographics

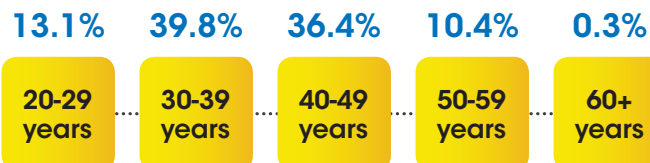
Balanced gender diversity



45%

Female in leadership positions (FY2020: 47%)

#### Percentage of workforce by age



### Accreditation



#### Bloomberg Gender Equality Index (GEI) 2021

Recognition in gender reporting and advancing women's equality



#### Corporate membership to drive leadership in gender diversity

Member of UN Women Empowerment Policies and Malaysia's 30% Club



#### UN Women Malaysia WEPs Awards 2021

2<sup>nd</sup> Runner Up in the Gender-inclusive Workplace Category

## Chapter 4: Social

### Learning and Development

We strongly believe in giving our employees the Freedom to Grow by providing employees with the tools and resources to develop and grow alongside the business. Learning and development at Digi is conducted via a mixture of on-the-job training, classes and face-to-face workshops in addition to online learning facilitated via Telenor Academy, an integrated online learning system with access to external platforms such as LinkedIn Learning, Linux Academy, Coursera and Udacity. In fact, beyond just providing avenues for employees to learn, we encourage them with incentives should they complete certain learning programs early.

Workshops	Number of participants	Workshops	Number of participants
<b>Tight-Loose-Tight (TLT)</b> - A leadership concept for People Managers	125	<b>NLP Associate Virtual Presenter Certification</b> - Training for effective storytelling	33
<b>Stepping Up</b> - To help in the leadership transition process	47	<b>Quarterly Security Training</b> - To increase cyber security awareness amongst all employees	100% completion
<b>LEAP</b> - To promote awareness about the role of a senior executive leader, within the context of a VUCA business environment	5	<b>Privacy Training</b> - To increase awareness on protection of personal data and privacy amongst all employees	98% completion
<b>Accelerate Expert</b> - To promote thought leadership amongst functional experts	4		
<b>Transform</b> - To explore habits and behaviours developed during participant's own leadership journey	15		
<b>Intermediate Expert Journeys</b> - A self-led expedition to upskill in critical skills of the future	143		
<b>Advanced Expert Journeys</b> - A guided expedition to upskill in critical skills of the future	43		

In 2021, we have successfully achieved

**52.6 hours**  
of average learning per employee\*  
(versus target of 40 hours)

*This is the accumulated hours clocked in from digital learning platforms only, such as Telenor Academy, Udacity, Coursera, and LinkedIn Learning, among others, and does not account for face-to-face or guided learning sessions.*

\* Employee average learning hours has been independently assured by KPMG PLT (This accounts for accumulated learning hours FY2021 and unaccounted learning hours from 1 October 2020 to 31 December 2020)

### Health and Safety

The employer promise of *Freedom to Care* emphasises for Digi employees to prioritise their work-life priorities and wellbeing. Digi sets high standards in health, safety, and people security for employees as well as in-house contractors, and suppliers.

Digi is committed to utilising a risk-based approach to our operations and implementing the relevant mitigations. This, while building an open culture where everyone has the right and duty to stop unsafe activity and intervene should there be any grievous health and safety violations. Additionally, we aim for continuous improvements by implementing ISO 45001 requirements that includes integrating Occupational Health and Safety (OHS) practices as a core aspect of Digi's culture. We constantly raise the competence and awareness of leaders and employees by implementing health and safety training programmes to achieve this ambition.

## FIRE SAFETY

A few minutes can make a big difference...

30 secs
60 secs
3 mins

IN CASE OF AN EMERGENCY  
**FIRE SAFETY**  
CALL 999

- Central region: Emergency hotline (24 hours)
- Central region: Chief Officer (24 hours)
- Northern region: Thamirah A.J. Khatib
- Southern region: Capt. Mohd Khair
- East coast region: Khairul Anwar
- Selangor: Major Jaafar
- Selangor: Captain Chai

**REMEMBER THIS!**

- Know the location of fire extinguisher and how to use it
- Know the fire escape route and able to reach assembly point safely
- Ensure all electrical appliances have been secured to prevent sparks
- Ensure proper storage of flammable items
- Smoking only at designated area
- Be sensitive to burning smell
- Report all unsafe conditions to HSE

**READ THIS TODAY!**

Digi's fire safety quick guide available in D'Health app

## Chapter 4: Social

### Employee's Training On Health and Safety

Number of employees that received training

**All employees**

Number of health and safety training programmes conducted

**Two programmes**

- Covid-19 Awareness training
- Covid-19 Return To Office training

Total training hours on health and safety

**2,411 hours**

In 2021, we recorded Zero Lost Time Injury Frequency (LTIF) score and zero fatality. Digi keeps track of work-related injuries and accidents, and sickness absence days for its permanent and contract employees, in-house contractors and third-party vendors.



**0**  
Lost Time Injury Frequency (LTIF)\* score Recorded



**0**  
Fatality Recorded

\* Lost Time Injury Frequency (LTIF) score (limited to permanent and contract employees) FY2021 has been independently assured by KPMG PLT

### Engagement Survey

In 2021, we introduced a 'Pulse Survey' to better understand the needs of our employees. This survey replaces the annual Employee Effectiveness Survey moving forward. The survey registered an 87% response rate.

#### Outcomes of Pulse Survey



**80%**

Believes that working from home works well for them



**84%**

Appreciates Digi's physical and mental well-being initiatives



**91%**

Believes that communications are sufficient and timely, which helps to keep them connected to Digi



**85%**

Acknowledges that managers are doing a good job in guiding, communicating and engaging



**87%**

Believes that Digi prioritises employee's well-being during Covid-19



**92%**

Agrees that Digi's compliance initiatives help them better understand the Code of Conduct

## Chapter 4: Social

### HUMAN RIGHTS

Human Rights are embedded into our Code of Conduct and our policies are based upon the Universal Declaration of Human Rights (UDHR). Furthermore, Digi is committed to respecting Human Rights as set out by the United Nations Guiding Principles on Business and Human Rights (UNGPs).

We have taken considerable measures to address current and potential human rights risks, such as conducting periodic Human Rights Due Diligence (HRDD) exercise, constant engagement with stakeholders, and training and capacity-building for partners and suppliers.

### Governance

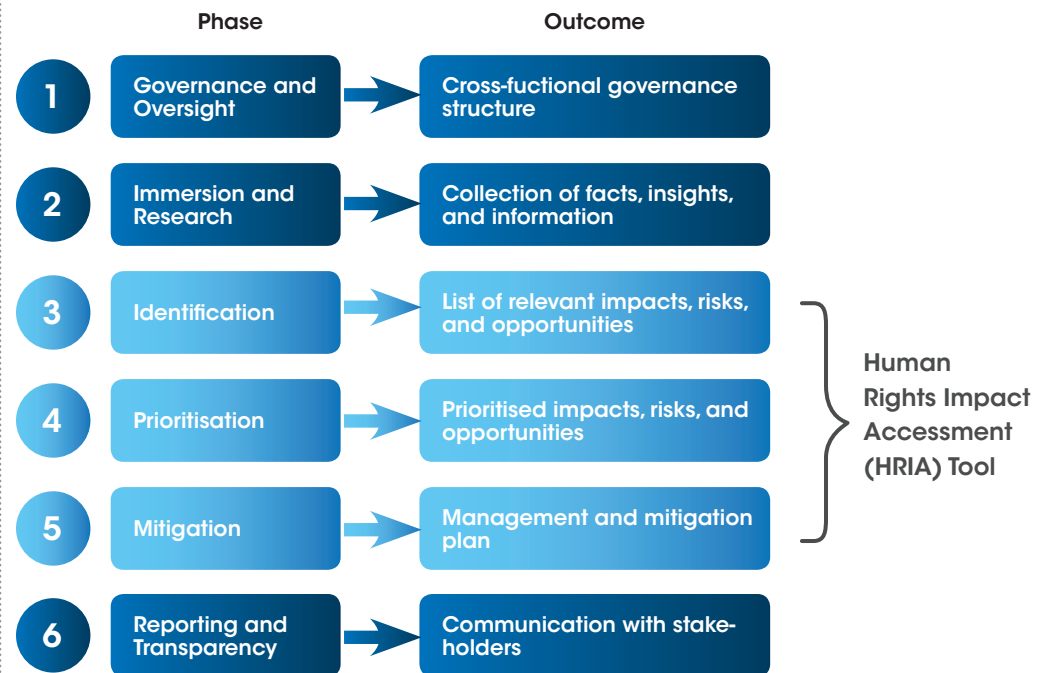
Human Rights is a cross cutting issue and followed up by several different functions within Digi, including Sustainability, Supply Chain Sustainability, Privacy (Local Authority Requests), Compliance and Labour Law, and Human Resource.

### Human Rights issues most salient for Digi

- Ensuring the **privacy and security** of customers' and partners' data
- Protecting the **freedom of expression, association, and assembly** of users
- Online safety and other steps to protect the rights of **vulnerable populations**, such as children and minorities
- Safeguarding the mental and physical **health, safety and wellbeing** of employees and those working for suppliers and subcontractors
- Increasing **access to information and technologies** especially for **education**
- Compliance with **labour standards** requirements

### Human Rights Due Diligence (HRDD)

Every alternate year, we conduct a Human Rights Due Diligence exercise to identify, prevent, and monitor human rights risks and impacts. The exercise is followed by a set of mitigating actions to address any current and potential risks. We use the Human Rights Impact Assessment (HRIA) tool to assess and validate human rights related risks across the organisation. The chart below summarizes the process undertaken.



The 2021 exercise evaluated a total of 19 areas of the business which were categorised (High, Medium and Low) based on business priorities and urgency of risks to be addressed. The comprehensive exercise involved 12 departments across Digi with 2 workshops and 7 focused group meetings with relevant stakeholders being conducted.



## Chapter 4: Social

### Human Rights Topics in Due Dilligence Process

Data Access  
and Intercept Legal  
Authority Requests



Collective Bargaining  
and Freedom  
of Association



Child Safety Online



Privacy and  
Data Security  
(Customers and Partners)



Use of Impacts and  
disruptive Technologies



Non-Discrimination  
and Equity



Grievance and Remedy



Freedom of Expression,  
Association, and Assembly  
- Network and Content  
Legal Authority Requests



Working Conditions:  
Wages, Hours  
and Benefits



Worker Wellbeing  
and Safety Working  
Environments



Human Trafficking  
(including child  
trafficking)



Modern Slavery,  
Forced Labour and  
Child Labour



Online Speech and  
offline harm



Land Rights  
(including indigenous  
people)



Corruption and  
bribery



High-risk and Conflict-  
Affected Contexts



Digital Inclusion  
and Literacy



Access to  
Education



Environmental and  
Infrastructure Impacts



Digi maintains active engagements with its stakeholders, both internal and external including civil society organizations, the government and industry peers to ensure that Human Rights concerns are addressed in a timely manner.

## Chapter 4: Social

### Grievances

In our efforts to uphold respecting human rights, Digi's Integrity Hotline is made available to all stakeholders to address any grievances. For more information, visit [telenorgroup.integrityline.com](https://telenorgroup.integrityline.com)

### Labour Rights

We are committed to Freedom of Association and Collective Bargaining. This is managed through Labour and Employee representation via two platforms - Digi Employees Union (DGEU) and the Best on People Council (BOPC). Both councils are formed via a democratic process by election of representatives across Digi and have regular dialogues with Digi's Management team.

### Responsible Marketing & Labelling

We strive to develop marketing messages and advertising that helps to keep our customers' trust as we pursue our brand promise to connect customers to what matters most. We have taken considerable efforts to ensure we do not consciously misrepresent or mislead any information regarding our products and services.

### DIGITAL INCLUSION & CORPORATE CITIZENSHIP

Digi aspires to enable all Malaysians with the power of the internet to maximise its positive impacts and to create an inclusive internet experience. In advocating and working towards equitable digital access for all, we expanded our nationwide 4G network and grew our fibre network in line with JENDELA ambitions, and focused our efforts in developing a digitally inclusive and resilient Malaysia through our Yellow Heart programmes.

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 leads in developing customised solutions geared towards helping SMEs and large enterprises accelerate their digital adoption.

### Initiatives & Performances

- Improving accessibility and enabling digital adoption nationwide
- Empowering societies with broader variety and meaningful usage of digital services
- Advancing as a trusted digital business solutions provider
- Implemented and supported nation building initiatives

### Nation Building Initiatives

In 2021, the effects of Covid-19 pandemic coupled with the year-end severe flooding continued to affect the lives and livelihoods of many in the country. As a connectivity provider, we are committed to the national agenda in supporting the rakyat get through difficult times, to build a stronger and resilient Malaysia.



#### Feature Story:

We believe that #connectivity benefits everyone in a community, even in the most remote of places. Our team of engineers worked for over 2 years and braved through harsh conditions to build a tower, providing #4G #network to the people of Mulu, Sarawak.



Scan the QR code to watch the video



**In the remote regions of Mulu, a team of Digi network engineers braved harsh conditions and the pandemic to bring connectivity to the people.**

## Chapter 4: Social

### Yellow Heart Education Data Packages

As the digitisation of education continues, access to online learning has proven to be a challenge, particularly for low-income households. Digi continue to support the Government-led *CERDIK* initiative by providing discounted data packages and connectivity options, benefiting over 11,000 students from low-income households.

### Support for COVID-19 recovery efforts

- **RM 1 Million commitment to GDRN (GLC/GLIC Disaster Response Network)**  
Contributed remaining funds amounting to RM 750,000 in the year through our NGO partner, Mercy Malaysia to support efforts in the on-going COVID-19 response and recovery initiatives. Contributions were used to purchase medical equipments and supplies for public hospitals nationwide, to facilitate door-to-door vaccinations focusing on persons with disabilities (PWDs), those in rural and remote areas, and the homeless, as well as support for post COVID-19 patients' recovery efforts.
- **Support Covid task force and frontline hospitals**  
Sponsored devices with connectivity to the National Rapid Response Task Force (GKVSTF) for contract tracing management, and to multiple frontline hospitals to support the needs of patients in Intensive Care Units and for counselling services.
- **Zero-rated calls to critical service hotlines** including Covid-19 websites, screening and admitting hospitals (as endorsed by the Ministry of Health) and telehealth providers such as DoctorOnCall



#### Feature Story:

Digi deployed portable mobile systems, providing a stable network in vaccination centres all around Malaysia.

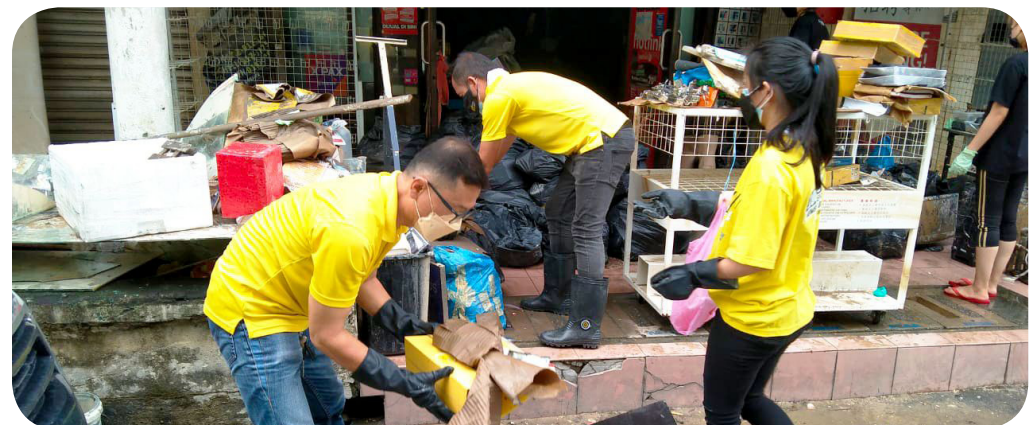


Scan the QR code to watch the video



### Floods relief and recovery efforts

- Provided prepaid subscribers with free internet
- Pledged up to RM500,000 via aid agencies
- Total of 140 employees supported with hotel accommodation, financial aid and home/vehicle repairs
- Rallied up efforts to restore disrupted sites and initiated employee volunteerism to support communities, including recovery of affected Digi retail stores





## Chapter 4: Social

### Accelerating Businesses and SMEs Digitalisation

#### MYDigital SME Programme

In our commitment to support micro SMEs' digitalisation journey, the 2021 MyDigital SME virtual series centered on educating business owners with knowledge and tools that they can adopt in sustaining their businesses during challenging times. Topics discussed included tips on optimising online tools and creating a strong social media presence, assimilating their businesses to e-commerce models.



**7 Episodes**  
**>150,000 Views**

#### Digital solutions to fast track business growth

Providing customised connectivity and managed services for business transformation.

- Dedicated internet access
- IoT solutions
- Cloud PABX
- Leased Line
- SIP Trunking
- IP VPN
- SD-WAN
- Oracle NetSuite Cloud-Based Enterprise Resource Planning System (ERP)
- Digital Solutions – iFleet, Omni, KrytoPOS, Cisco Umbrella, alTHR, AVANA, UltraPOS All-in-1 Payment Terminal

#### #KamiCareMbiz programme

Through the #KamiCareMbiz programme, we offered over **RM500,000** worth of digital solutions and mobile plans to help local micro and small business owners go digital.



#### Penjana SME Digitalisation Grant

In line with the Government's PENJANA initiative to boost digital adoption, we provided a suite of Go Digital bundles comprising all-in-one solutions essential for digitalisation, including digital marketing, connectivity solutions and productivity tools to suit different business needs.



**~9,000 Businesses benefitted**



#### MEF 3.0 Certification

Digi Business joined MEF, a global federation of network, cloud, and technology providers working together to empower enterprise digital transformation. The MEF 3.0 certification is an important milestone as it continues to provide customers with a secured, reliable network that is in compliance with MEF's high technical standards. With Digi Business' connectivity solutions like SD-WAN, Metro Ethernet, Direct Internet Access, and others being MEF certified, businesses are assured that they will get customised solutions supported by certified engineering team that are of global standards.

#### Empowering the Educators and Youth for the Future

Future Skills For All (FS4A) is a multi-stakeholder driven initiative (on-going collaboration with MDEC, UNICEF and ARUS Academy, and supported by the Ministry of Education) to strengthen inclusivity and equity in education by establishing a digital learning environment, focused on making future skills learning accessible for the underserved. In 2021, we continued to drive good momentum with FS4A, prioritising the focus to greater scale to enable more segments of societies to learn and adopt future skills learning. For more information on FS4A, visit [futureskills.moe-dl.edu.my](https://futureskills.moe-dl.edu.my)



**34,582\* Enrolments and counting**

\* Number of FS4A enrolment up to 31 December 2021 has been independently assured by KPMG PLT



## Chapter 4: Social

- **#BolehCode – Coding as a third language**

The #BolehCode initiative aims to increase awareness on the importance of digital skills and to adopt coding as a fundamental skill. The activities held include state level and national level competitions, short coding lessons on TikTok@gurufutureskills, school holiday programmes, workshops for teachers and certification programmes endorsed by the Ministry of Education (MOE) Malaysia.

- **Enabling the differently abled students to learn coding**

In efforts to make digital skills modules more accessible for all, we partnered with the Malaysian Federation of the Deaf (MFD), providing them micro:bit sets and coding training for their teachers. This training will equip the teachers to teach the digital modules to deaf students to prepare them for the future workforce. This pilot initiative helps Digi to better assess the needs of the deaf community and develop a more inclusive line-up of existing FS4A modules.



### A decade long commitment for a safer internet

Digi celebrated the tenth anniversary of its flagship Safe Internet programme in conjunction to the international Safer Internet Day (SID) on February 9. Underscoring the continuous commitment to empower Malaysians with skills to be more resilient and responsible online citizens, we launched the Yellow Heart Safe Internet portal, a one-stop repository of educational material to equip Malaysians with the right tools and knowledge using the internet safely. These include guidebooks for parents and children, video series, national syllabus modules and more. Visit <https://safeinternet.my/>



 > **91,000 Engaged**

## Chapter 4: Social

### • Digital Wellbeing Survey

In partnership with Sunway University, we conducted the "Life Under COVID-19 for Children Online: Values & Challenges (2021)" survey which provided insights to the digital lives of youths during this pandemic. This marks Digi's third Yellow Heart survey to uncover the experiences of young people in the areas of online safety, mental wellbeing and the cultivation of future skills. The survey polled 1,746 students aged below 21 nationwide from August to September 2021. The full findings from the survey can be found here <http://digi.my/syhi>

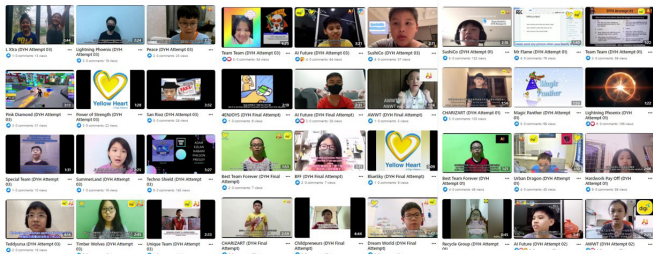
### • Advocating for a safer internet

In collaboration with like-minded partners we participated in several engagement platforms comprising online webinars and panel session to drive greater advocacy and awareness on the topic of child online safety.



Five regional-level safe internet workshops were conducted during the #mydigitalmaker Virtual Fair 2021.

Collaborated with Ai Talent on a series of workshops on safe internet with children. More than 100 short awareness videos were created by the children.



Series of virtual workshops with subject matter experts organised by UNICEF and R.AGE to discuss about healthy relationships, including cyber-grooming. The workshops registered over 950 participants.



Dedicated virtual hotlines to help volunteers and counsellors provide emotional support and counselling services during Covid-19.



'Championing Child Rights In The Digital Age' is a dialogue on protecting children's rights in Malaysia's digital transformation journey.

## Chapter 5: Governance

Governance in Digi pertains to the rules and procedures by which we govern and control the business, from policymaking to the distribution of rights and responsibilities among different participants of the business, including Digi's Board of Directors, the Digi Management Team, employees and stakeholders. Good corporate governance is fundamental for sustainable value creation for Digi's diverse stakeholder groups.

For more information on Digi's approach towards Corporate Governance and practices, visit Section 5 : Corporate Governance Overview Statement (page 94 onwards) from Digi's Integrated Annual Report 2021.



### 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. We strive to raise standards of conduct amongst our business partners through monitoring and mitigation activities while focusing on continuous improvement. Business partners having a direct contractual relationship with Digi are required to comply with Telenor's Supplier Conduct Principles (SCP) and are legally obliged to adhere to the requirements in the Agreement on Responsible Business Conduct (ABC).

#### Governance

Digi's approach to supply chain sustainability is to legally oblige the supplier to uphold responsible business practice according to our policies and Supply Chain Principles (SCP). We follow-up with training and inspections to ensure preventive strategies for Health, Safety and Security (HS&S), anti-corruption, human rights and other sustainability risks are executed across

our downstream value chain, including distribution and sales channels. The Supply Chain in Digi is under the purview of our Corporate Infrastructure Management as well as Procurement and Logistics departments.

#### Initiatives & Performances

- Training and capacity building sessions for suppliers to raise standards on health and safety and responsible business practices
- Industry collaboration to strengthen enforcements in maintaining the highest standards of safety across our supply chain
- Dynamic sourcing and supply chain management to ensure adequate and contingency supply
- Pre-emptively close gaps on potential human rights risk across Digi's supply chain based on findings from Human Rights Due Diligence in 2021
- Safety Advance Project - Advancing HS&S culture for employees and suppliers

Year	FY 2019	FY 2020	FY 2021
New suppliers signing Digi's ABC	112	130	<b>179*</b>
Total number of suppliers who signed Digi's ABC	1790	1920	<b>2099</b>
Total number of Inspections conducted	459	511	<b>510</b>
Number of inspections Unannounced	429	463	<b>509</b>
Number of inspections announced	30	48	<b>1</b>
Number of major findings	9	5	<b>16</b>
Number of minor findings	203	194	<b>45</b>
Number of suppliers terminated	1	3	<b>2</b>
Total suppliers training hours	2594	2426	<b>5635</b>

\* Number of new suppliers signing Digi's ABC FY2021 has been independently assured by KPMG PLT



## Chapter 5: Governance

Direct suppliers to Digi are assigned as Tier-1, and sub suppliers to Tier-1 are assigned as Tier-2 and so forth. We constantly review and monitor our supplier base and perform risk categorisation based on Digi's risk assessment matrix. The risk categorisation also takes into account results from assessments performed during IDD process, desk review and Supplier Assessment Questionnaire (SAQ), and data points from on-going and historical inspections. Our inspections consist of both announced and unannounced. Non-compliances have been identified on matters-related to health and safety, prohibited business practices, human rights, environment, cyber security and breach of regulatory compliance. We required suppliers to develop corrective action plans based on the outcome of the inspections.

To ensure we manage the risks within our supply chain, we send out the SAQ to our suppliers annually to assess their performances against environmental, social and governance factors. In addition, bi-monthly meetings were conducted with Tier-1 suppliers' safety officers.

To mitigate the rising concerns on human rights risks, we have been actively engaging with our suppliers on our expectations and commitments. Stricter requirements were introduced on suppliers including :

### SUPPLIER REQUIREMENTS:

Produce valid work permit for all workers

Acquired CIDB license

Legal age requirements, including compensation, benefits and living conditions provided in accordance to statutory laws and regulations

Acquired necessary technical and safety certification

Mandatory application via DPTW app prior to commencing work at site

### COMPLIANCE AND ANTI-CORRUPTION

Compliance is Digi's strategic priority and forms an essential element of good 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.

#### 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 and other stakeholders 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 Digi Management Team and the Board on a periodic basis. The Audit and Risk Committee has responsibility over the reported incidents, to review the related policy and manual in addressing such reports, and to ensure investigations are conducted objectively and independently.

#### Initiatives & Performances

- Conducting Compliance risk assessment and monitoring activities besides evaluation of government policies and regulations to identify and manage emerging risks
- Dedicated resources for on-going compliance monitoring across our business value chain
- Integrated governance and holistic business partners and vendor management procedures
- Implement Certification Accreditation for ISO 37001 Anti-Bribery Management System
- Regular capacity building sessions for employees, business partners, management, members of the Board and Audit and Risk Committee (ARC) on the compliance requirements of Digi



## Chapter 5: Governance

### 100%

Acceptance rate by Digizens on the Code of Conduct 2021

### 92%

Agree that Digi's compliance initiatives help them better understand the Code of Conduct  
*Pulse Survey 2021*  
(87% Digizens participated)

### 100%

Completion rate of Digi's Anti-Corruption e-Learning module on Telenor Academy

### Improved Code of Conduct

Earlier this year, we introduced an updated Code of Conduct with the following enhancements :

**Health, Safety and People Security** - To emphasise the importance of building a strong safety culture where not only the acts of employees, but also those of our suppliers are put in focus.

**Human Rights and Labour Rights** - To reflect a more precise and active role in securing the compliance with human rights and labor rights of employees and relevant external parties.

**Languages** - Made available in 10 languages.

The updated Code of Conduct can be found here : <https://www.telenor.com/code-of-conduct>

### Formation of the Governance, Risk and Compliance (GRC) Committee

The GRC Committee provides a platform for governance functions across Digi to deliberate significant GRC matters and subsequently formulate appropriate responses to address them. The Committee meets on a quarterly basis and is chaired by the Compliance Officer. Key functions of the GRC Committee are to:

- Provide guidance on GRC matters in alignment with Digi's corporate governance controls and industry best practices
- Deliberate the adequacy and effectiveness of GRC policies, procedures and initiatives to ensure that enterprise risks are effectively managed
- Promote efficient resource allocation through the holistic oversight of GRC initiatives to minimise overlaps and duplication of effort
- Assist the CEO and ARC in fulfilling its oversight responsibilities on GRC matters

### Digi's Anti-Corruption Day

Digi's Anti-Corruption Day is held annually on 9 December in recognition of International Anti-Corruption Day. Company-wide trainings and awareness were carried out to educate employees and to reinforce our zero tolerance policy towards corruption.



**It's Digi Anti-Corruption Day today!**  
*Join the activities & win exciting prizes*



Dear Digizens,

Today is International Anti-Corruption Day—and we celebrate it by reinforcing our commitment to zero

**Your right, your role: Say no to corruption**

In line with this year's theme, "Your right, your role: Say no to corruption", we emphasize, once again, that ensure that our business and individual conduct are guided by the principles of honesty and integrity. Thus act accordingly when we find ourselves in a situation or dilemma.

To support you, we have our [Anti-Corruption Policy](#) to guide and govern all our actions. You are also encouraged to report any misconduct to your line manager or Compliance department. Do [Whistleblowing Policy](#).

### Governing Documents

As part of Telenor Group, we conducted a simplification project with the aim to streamline and simplify the policy framework, as well as to improve compliance with the policies and manuals within Digi. As part of this initiative, the anti-corruption policy was revised to clearly define specific and measurable requirements for demonstrating that an adequate and risk-based anti-corruption programme is in place.

## Chapter 5: Governance

### DATA PRIVACY AND CYBER SECURITY

Digi prioritises data protection and cyber security to ensure employees' and customers' personal data are safe and secure. Our data privacy and cyber security strategy incorporates strong governance around strengthening of internal controls and in driving a responsible business culture, supported by continuous awareness on best practices.

#### Governance

Digi has a clear privacy and information security position - 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 and security, authority requests and information management. These functions are monitored under the purview of Digi's Data Privacy Officer (DPO), and Heads of Security and Legal.

#### Initiatives & Performances

- Regular scrutiny and data protection impact assessment by dedicated privacy and security teams
- Establish Privacy Control Framework
- Strengthen customers' data protection and practice transparency in the way we collect and use their personal data
- Constant evaluation of our business strategy, new technologies, and processes to protect against cyber threats
- Improve detection and threat prevention through deployment of network security and defendable architecture with robust monitoring, awareness reiteration and up-to-date security training
- Implement identity and privileged access management tool to strengthen access control to critical systems
- Improve cyber security maturity governance to protect Digi against cyber risks

#### Privacy and Cyber Security as a Responsible Business culture

- Launched trainings on the importance of privacy, information management, and data protection as part of new employees' onboarding and awareness for frontlines
- Executed mandatory quarterly privacy and cyber security training for all employees
- Conducted training on topics such as privacy awareness and business partner privacy management
- Produced bite-size materials to raise awareness on privacy and information management

#### Personal data protection

Digi continued to implement adequate measures to protect customers' personal data in view of growing data consumption, heightened awareness on data protection and interventions by regulatory bodies.

*Visit our [Privacy and Data Protection website](#) for more information on how we comply to strictest standards, internal governance processes and enforce security measures in managing our customer data.*

#### Company-wide data mapping exercise

Digi has embarked on a comprehensive and structured privacy mapping programme to catalogue data inventory and flow. This will provide a holistic view on privacy related risks across Digi's value chain.

- Established internal governance controls to protect customers' data
- Executed in three phases, with 84 systems in 12 months
- Documented and recorded all customers, employees, and 3rd party personal data and asset listing
- Completed privacy risk assessment and remediation roadmap



## Chapter 5: Governance

### Improved privacy practices

- Enhanced standard contractual clauses for data protection
- Enabled self-serve option on MyDigi app and Digi's website for customer to opt-out from marketing communications and promotional materials
- Established business partner privacy management process to govern end-to-end privacy compliance
- Updated Privacy Notice, improving on categorisation of data collected for easier customer comprehension

### Strengthening cyber security controls

Digi is committed to reduce the impact of service disruptions by ensuring its infrastructure is protected and services are not interrupted, thereby enabling continuous services to its customers.

The Cyber Security functions are responsible for ensuring confidentiality, integrity and availability of information and information processing facilities, including telecommunication systems and infrastructure and to protect against cyber-attacks, fraudulent activities, information loss and other security risks and threats arising internally and externally. The Fraud Management function manages and mitigates the risk of relevant fraud and related losses. Some of its key activities involve developing and designing internal fraud controls which are regularly reviewed to ensure relevance and effectiveness. Fraud awareness activities, measures and continuous actions are taken to ensure telecommunication fraud is minimised and the requirement for preventive controls are embedded into business processes.

Security Assurance and Maturity Assessment activities in accordance with Information Security Forum standards are performed to ensure network security protection. This includes conducting security awareness sessions, running vulnerability management and security posture assessments, and continuous security monitoring and governance in security compliance audits and risk management. Digi complies with the ISO 27001:2013 – Information Security Management System. Periodic meetings are held with the Digi Management Team and Chief Technology Officer to discuss and approve security initiatives, activities, policies and projects driven by the Security department.

### Business Continuity Management (BCM)

Digi recognises the importance of providing uninterrupted mission critical and time sensitive products and services to its customers. Hence, disruptive incidents are handled and responded to effectively to ensure a structural recovery that safeguards the interests of its stakeholders, as well as to protect the credibility and reputation of Digi. Digi complies with ISO 22301: Business Continuity Management. The Management continuously leads the drive to enhance Digi's Business Continuity processes which encompass emergency response, crisis management, crisis communication, business continuity and Network and IT disaster recovery. In addition, Digi has an annual BCM programme which includes awareness, training, review and validation on the efficiencies and effectiveness of BCM.

## GRI Data

### Environmental

	Unit	2019	2020	2021
<b>Energy Consumption</b>				
Total direct energy used	GWh	40.10	44.12	42.50
Network	GWh	34.31	38.56	37.51
Fleet	GWh	5.76	5.54	4.97
Buildings	GWh	0.03	0.02	0.02
Total indirect energy used	GWh	267.84	281.94	297.21
Network	GWh	260.93	276.40	292.23
Buildings	GWh	6.91	5.54	4.98
Total energy consumption	GWh	315.88	329.18	341.01
Energy use per end use customer	KWh/customer	28.00	31.53	33.05
Solar power generated (Network)	GWh	0.08	0.08	0.01
<b>Carbon Emissions</b>				
Total Scope 1 emissions	Tonnes CO <sub>2</sub> e	9763.92	10750.88	10345.14
Network	Tonnes CO <sub>2</sub> e	8363.12	9400.67	9143.53
Fleet vehicles	Tonnes CO <sub>2</sub> e	1394.03	1345.61	1197.23

	Unit	2019	2020	2021
Building	Tonnes CO <sub>2</sub> e	6.77	4.60	4.38
Total Scope 2 emissions	Tonnes CO <sub>2</sub> e	174044.00	185745.74	196776.12
Network	Tonnes CO <sub>2</sub> e	169552.50	182094.88	193478.86
Buildings	Tonnes CO <sub>2</sub> e	4491.50	3650.86	3297.26
Total Scope 3 emissions	Tonnes CO <sub>2</sub> e	1638.03	734.70	332.79
Air travel	Tonnes CO <sub>2</sub> e	802.67	162.75	24.85
Leased vehicles	Tonnes CO <sub>2</sub> e	835.36	571.95	307.94
Total carbon emissions	Tonnes CO <sub>2</sub> e	185445.95	197231.32	207454.05
Carbon emission per customer	Tonnes CO <sub>2</sub> e/customer	0.016	0.019	0.020
Carbon intensity per data usage	Tonnes CO <sub>2</sub> e/terabyte	0.14	0.11	0.09
<b>Other environment indicators</b>				
E-waste collected	Tonnes	30	47	162
Municipal waste	Tonnes	281	251	148
Water consumption	m <sup>3</sup>	93770	78856	68435



## GRI Data

### Social

	Unit	2019	2020	2021
<b>Gender</b>				
Male	Numbers	777	733	720
Female	Numbers	758	740	718
Total	Numbers	1535	1473	1438
<b>Race</b>				
Bumi	%	2	2	2
Malay	%	29	29	30
Chinese	%	51	51	50
Indian	%	15	15	14
Others	%	3	3	4
<b>Age</b>				
20-29	%	15.8	14.5	13.1
30-39	%	43.0	40.9	39.8
40-49	%	34.1	36.0	38.8
50-59	%	7.0	8.3	8.1
> 60	%	0.1	0.3	0.2

	Unit	2019	2020	2021
<b>Other indicators</b>				
% of women in leadership <sup>1</sup>	%	46	47	45
Employee Effectiveness Index Score (EEIS)	%	65	71	N/A EEIS has been replaced with Pulse Survey
Lost Time Injury Frequency <sup>2</sup>	No/Million hours	0	0	0
% of employees under bargaining agreement	%	33	30	30
Average training hours per employee	Hours	51.3	59.8	52.6
Turnover (Male) <sup>4</sup>	Numbers	122.0	107.0	104.0
Turnover (Female) <sup>4</sup>	Numbers	113.0	135.0	87.0

<sup>1</sup> Up to CXO-2 level managers.

<sup>2</sup> LTIF is based on 9 working hours x actual working days in a year (minus leave and public holidays) x number of employees.

<sup>3</sup> Based on the total training hours divided by number of Digi permanent employees. For the 2021 learning hours, it also includes the unaccounted learning hours from 1 October 2020 to 31 December 2020. Only online learning hours were accounted in.

<sup>4</sup> This includes Digi employees, voluntary and involuntary resignation.

## GRI Data

### Governance

	Unit	2019	2020	2021
<b>Anti-Corruption</b>				
Material Cases of Corruption	Number	0	0	0
<b>Supply Chain Sustainability</b>				
New Signed Agreement on Business Conduct	Number	111	130	179
Inspections conducted	Number	460	511	510
Incidents of major non-compliance	Number	9	5	16
Incidents of minor non-compliance	Number	203	194	45
Contractors suspended <6 months	Number	0	0	0
Contractors terminated	Number	1	3	2
Fatalities	Number	0	0	0
Supplier training	Hours	2594	2426	5635

## 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	Digi Integrated Annual Report 2021 – About Digi - p.4, Our Business Model – p.24
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 2021 – Our Operating Landscape - p.26, Our Business Model - p.24
102-7	Scale of the organisation	Digi Integrated Annual Report 2021 – Corporate Structure - p.5, Our Operating Landscape - p.26, Our Business Model - p.24
102-8	Information on employees and other workers	Digi Integrated Annual Report 2021 – How We Create Value (Human Capital) - p.6 Digi Sustainability Performance 2021 – Diversity and Inclusion, Learning and Development – p.17, p.18
102-9	Supply chain	Digi Integrated Annual Report 2021 – How We Create Value (Social & Relationship Capital) - p.77 Digi Sustainability Performance 2021 – Governance (Supply Chain Sustainability) – p.27
102-10	Significant changes to the organisation and its supply chain	Digi Integrated Annual Report 2021 – How We Create Value (Social & Relationship Capital) - p.77 Digi Sustainability Performance 2021 – Governance (Supply Chain Sustainability) – p.27
102-11	Precautionary Principle or approach	Digi Integrated Annual Report 2021 – Our Identified Key Risks – p.33
102-12	External initiatives	As part of Telenor Group, Digi subscribes or endorses the following initiatives: <ul style="list-style-type: none"> <li>• UN Global Goals for Sustainable Development</li> <li>• GRI</li> <li>• CDP (formerly known as Carbon Disclosure Project)</li> <li>• Principles of the World Economic Forum</li> <li>• Business for Social Responsibility™</li> </ul>

## GRI Table

GRI 102 General Disclosures	Standard disclosure	Digi response
Organisational Profile		
102-13	Membership of associations	<ul style="list-style-type: none"> <li>• Business Integrity Alliance (BIA)</li> <li>• Malaysian Investor Relations Association (MIRA)</li> <li>• CEO Action Network Working Group</li> </ul> <p>As part of Telenor Group, Digi is a member of:</p> <ul style="list-style-type: none"> <li>• GSMA</li> <li>• The Telecommunications Industry Dialogue, which has observer status in the GNI, and the Global e-Sustainability Initiative</li> </ul>
Strategy		
102-14	Statement from senior decision-makers	<p>Digi Integrated Annual Report 2021 – Chair of the Board's Statement - p. 6</p> <p>Digi Integrated Annual Report 2021 – CEO's Statement - p. 10</p> <p>Digi Integrated Annual Report 2021 – CFO's Statement - p. 14</p> <p>Digi Sustainability Performance 2021 – Our View On Managing Sustainability - p.4</p>
102-15	Key impacts, risks, and opportunities	Digi Integrated Annual Report 2021 – Our Key Risks - p.33, Our Emerging Opportunities - p.41
Ethics & Integrity		
102-16	Values, principles, standards, and norms of behavior	<p>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.</p> <p><a href="https://www.digi.com.my/our-company/our-governance">https://www.digi.com.my/our-company/our-governance</a></p>
102-17	Mechanisms for advice and concerns about ethics	<p>Digi Integrated Annual Report 2021 – How We Create Value (Social &amp; Relationship Capital) - p.73</p> <p>Digi Sustainability Performance 2021 – Ethics &amp; Compliance - p.28</p>



## GRI Table

GRI 102 General Disclosures	Standard disclosure	Digi response
Governance		
102-18	Governance structure	Digi Integrated Annual Report 2021 – Corporate Governance Overview Statement - p.94, p.97
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 Integrated Annual Report 2021 - Management Profiles – p.90
102-21	Consulting stakeholders on economic, environmental, and social topics	Digi Integrated Annual Report 2021 – Our Key Relationships - p.30
102-22	Composition of the highest governance body and its committees	Digi Integrated Annual Report 2021 – Board of Directors’ Profiles - p.84 Digi Integrated Annual Report 2021 – Corporate Governance Overview Statement - p.94
102-23	Chair of the highest governance body	Digi Integrated Annual Report 2021 – Board of Directors’ Profiles - p.84
102-24	Nominating and selecting the highest governance body	Digi Integrated Annual Report 2021 – Corporate Governance Overview Statement - p.94
102-25	Conflicts of interest	Digi Integrated Annual Report 2021 – Corporate Governance Overview Statement - p.94
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 2021 – Management Profiles - p.90
102-27	Collective knowledge of highest governance body	Digi Integrated Annual Report 2021 – Corporate Governance Overview Statement - p.94
102-28	Evaluating the highest governance body's performance	Digi Integrated Annual Report 2021 – Corporate Governance Overview Statement - p.94
102-30	Effectiveness of risk management processes	Digi Integrated Annual Report 2021 – Statement on Risk Management and Internal Control - p.119
102-31	Review of economic, environmental, and social topics	Digi Integrated Annual Report 2021 – Statement on Risk Management and Internal Control - p.119

## GRI Table

GRI 102 General Disclosures	Standard disclosure	Digi response
Governance		
102-32	Highest governance body's role in sustainability reporting	Digi Sustainability Performance 2021 is reviewed and approved by Digi Management Team and Digi Board.
102-33	Communicating critical concerns	Digi Integrated Annual Report 2021 – Statement on Risk Management and Internal Control - p.119
102-34	Nature and total number of critical concerns	N/A
102-35	Remuneration policies	Digi Integrated Annual Report 2021 – Directors' Report – p.130
102-36	Process for determining remuneration	Digi Integrated Annual Report 2021 – Directors' Report – p.130
102-37	Stakeholders' involvement in remuneration	N/A
102-38	Annual total compensation ratio	N/A
102-39	Percentage increase in annual total compensation ratio	N/A
Stakeholder engagement		
102-40	List of stakeholder groups	Digi Integrated Annual Report 2021 – Our Key Relationships - p.30
102-41	Collective bargaining agreements	30% of employees are covered by collective bargaining agreement as at 31 Dec 2021.
102-42	Identifying and selecting stakeholders	Digi Integrated Annual Report 2021 – Our Key Relationships - p.30
102-43	Approach to stakeholder engagement	Digi Integrated Annual Report 2021 – Our Key Relationships - p.30
102-44	Key topics and concerns raised	Digi Integrated Annual Report 2021 – Our Key Relationships - p.30
102-45	Entities included in the consolidated financial statements	Digi Integrated Annual Report 2021 – Audited Financial Statements - p.129
102-46	Defining report content and topic Boundaries	Digi Integrated Annual Report 2021 – Our Material Matters - p.38

## GRI Table

GRI 102 General Disclosures	Standard disclosure	Digi response
Stakeholder engagement		
102-47	List of material topics	Digi Integrated Annual Report 2021 – Our Material Matters - p.38
102-48	Restatements of information	Digi restated our climate data for 2019-2020 following the outcome of a Climate Data Integrity exercise undertaken with an independent advisor to improve our methodology in data collection and management approach. Corrective measures have been undertaken to ensure consistency, accuracy and transparency of the data presented, in line with good climate governance practices. Digi Integrated Annual Report 2021 – How We Create Value (Natural Capital) – p.68
102-49	Changes in reporting	Nil
102-50	Reporting period	Calendar year 2021
102-51	Date of most recent report	Previous report published in 2021, covering calendar year 2020
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the report	Philip Ling Oon Hun E-mail: ohling@digicom.my
102-54	Claims of reporting in accordance with the GRI Standards	GRI-referenced claims
102-55	GRI content index	Digi Sustainability Management - <a href="https://www.digicom.my/sustainability/reporting.html">https://www.digicom.my/sustainability/reporting.html</a>
102-56	External assurance	Digi Integrated Annual Report 2021 – Independent Assurance Report - p.218 An independent assurance of selected sustainability indicators from 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.

## GRI Table

GRI 103 Management Approach	Standard disclosure	Digi response
103-1	Explanation of the material topic and its Boundary	<p>All material topics selected are relevant throughout our value chain. We have taken into account the following factors during Digi's materiality assessment process :</p> <ul style="list-style-type: none"> <li>• Reasonable economic, environmental, and/or social impacts identified through sound investigation with external expert bodies such as GSMA, GeSI, CDP, GNI, and BSRTM</li> <li>• The interests and expectations of wide group of stakeholders specifically invested in Digi</li> <li>• 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.</li> <li>• 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</li> <li>• Local laws and regulations, international agreements, or voluntary agreements of strategic significance to Digi and its stakeholders.</li> <li>• Digi's values, policies, strategies, operational management systems, goals, and targets.</li> <li>• 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.</li> </ul>
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 Digi Integrated Annual Report 2021 – How We Create Value – p.50
103-3	Evaluation of the management approach	Material topics are discussed in Digi Integrated Annual Report 2021 – How We Create Value – p.50 and Digi Sustainability Management - <a href="https://www.digi.com.my/sustainability/reporting.html">https://www.digi.com.my/sustainability/reporting.html</a>
GRI 200 Economic Performance	Topic-Specific disclosure	Digi response
201-1	Direct economic value generated and distributed	Digi Integrated Annual Report 2021 – Our Operating Landscape - p.26, Chief Financial Officer's Statement - p.14, 5-Year Financial Summary - p.21 . Audited Financial Statements - p.129
201-2	Financial implications and other risks and opportunities due to climate change	Digi Integrated Annual Report 2021 – Our Operating Landscape - p.26, Our Key Risks – p.33



## GRI Table

GRI 200 Economic Performance	Topic-Specific disclosure	Digi response
202-2	Proportion of senior management hired from the local community	Digi Integrated Annual Report 2021 – Management Profiles - p.90
203-1	Infrastructure investments and services supported	Digi Integrated Annual Report 2021 – 5-Year Financial Summary - p.21. Audited Financial Statements - p.129, How We Create Value - p.50
203-2	Significant indirect economic impacts	Digi Integrated Annual Report 2021 – Our Operating Landscape - p.26, How We Create Value - p.50
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 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 Integrated Annual Report 2021 – The Value We Created (Social & Relationship Capital) - p.73 Digi Sustainability Performance 2021 – Ethics & Compliance - p.28
205-2	Anti Corruption - Communication and training about anti-corruption policies and procedures	
207-1	Approach to tax	Digi Integrated Annual Report 2021 – Notes to Financial Statements - p.147

GRI 300 Environmental Performance	Standard disclosure	Digi response
302-1	Energy consumption within the organisation	Digi Integrated Annual Report 2021 – How We Create Value (Natural Capital) - p.67*
302-3	Energy intensity	
302-4	Reduction of energy consumption	
305-1	Emissions	Digi Integrated Annual Report 2021 – How We Create Value (Natural Capital) - p.67*
305-2	Emissions	
305-3	Emissions	
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 Table

GRI 400 Social Performance	Topic-Specific disclosure	Digi response
403-1	Occupational Health and Safety – Occupational health and safety management system	Digi pioneered the adoption of ISO 45001 Occupation Health and Safety Management System certification.
403-5	Occupational Health and Safety – Worker training on occupational health and safety	Digi Integrated Annual Report 2021 – How We Create Value (Human Capital) - p.62
403-9	Occupational Health and Safety – Work-related injuries	For the indicator 403-9; Digi's Long Term Injury Frequency calculation for 2021 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 2021. Digi Integrated Annual Report 2021 – How We Create Value (Human Capital) - p.62
404-1	Training and Education – Average hours of training per year per employee	For the indicator 404-1; Digi's Employees' Training Hours for 2021 have been independently verified through a limited assurance by KPMG PLT*. Digi Integrated Annual Report 2021 – How We Create Value (Human Capital) - p.62
404-2	Training and Education – Programs for upgrading employee skills and transition assistance programs	Digi Integrated Annual Report 2021 – How We Create Value (Human Capital) - p.62
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 Integrated Annual Report 2021 – How We Create Value (Human Capital) - p.62
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 an annual Self-Assessment Questionnaire (SAQ) are mandatory to be completed by all registered vendors
409-1	Forced or Compulsory Labor - Operations and suppliers at significant risk for incidents of forced or compulsory labor	

## GRI Table

GRI 400 Social Performance	Topic-Specific 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 BSRTM, 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. Additionally, in 2021 we conducted a Human Rights Due Diligence exercise to assess potential human rights risks. Digi Sustainability Performance 2021 – Human Rights - p.20
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 Future Skills programme for 2021 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 future skills learning, and enabling digital inclusion. Digi Integrated Annual Report 2021 – How We Create Value (Social Capital) - p.73 Digi Sustainability Performance 2021 – Digital Inclusion - p.22
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 2021 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 179 were screened using labour practices criteria. Digi Integrated Annual Report 2021 – How We Create Value (Social Capital) - p.73
414-2	Supplier Social Assessment - Negative social impacts in the supply chain and actions taken	In 2021, 2 vendors were terminated for failing to meet our safety standards. Digi Integrated Annual Report 2021 – How We Create Value (Social Capital) - p.73
417-2	Marketing and Labeling - Incidents of non-compliance concerning product and service	Digi is not aware of any incidents or non-compliances concerning product and service information and labelling in 2021.
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 2021.

## GRI Table

GRI 400 Social Performance	Topic-Specific disclosure	Digi response
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 2021. Digi Integrated Annual Report 2021 – How We Create Value (Intellectual Capital) - p.57

\* Assurance in accordance with the approved standard for assurance engagements in Malaysia, International Standard on Assurance Engagements ("ISAE") 3000 "Assurance Engagements Other Than Audits or Reviews of Historical Financial Information". Please view the Assurance report under Digi Integrated Annual Report 2021 – Independent Limited Assurance Report - p.218





**[www.digi.com.my](http://www.digi.com.my)**

**Digi.Com Berhad**

Reg. No. 199701009694 (425190-X)

Lot 10, Jalan Delima 1/1,  
Subang Hi-Tech Industrial Park,  
40000 Shah Alam,  
Selangor, Malaysia  
Email: [invesrel@digi.com.my](mailto:invesrel@digi.com.my)