

Policy Title	Anti-Corruption, Corporate Gift & Hospitality
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1 Policy Statement

This policy sets out the StarHub Group's policy and framework pertaining to anti-corruption as well as the giving and receiving of any form of gratification. In order to make this commitment clear to employees, suppliers, customers and other stakeholders, this policy shall be publicly available on the Group's corporate website. All Group policies are communicated to employees upon hiring and can be readily accessed through StarHub's intranet. The Group will also ensure that employees refresh their awareness of Group policies periodically and conduct training where necessary.

The Group adopts a zero-tolerance approach towards any form of corruption and bribery in the conduct of its business activities and is committed to fair business conduct in all dealings and relationships with External Parties (defined below). Employees (defined at Clause 1.2(a) below) are expected to demonstrate the highest level of professional conduct when conducting business activities for and on behalf of StarHub Ltd or any of its subsidiaries and/or related companies and/or designated associate companies (hereinafter collectively and severally referred to as the "**Company**").

Employees must exercise prudence and integrity at all times in the exercise of their duties and shall undertake not to engage in any corrupt or improper practices in their dealings with existing and/or potential persons/entities with whom the Company conducts or is looking to conduct business activities with, including but not limited to:

- (a) suppliers, service providers, consultants, business partners, customers and their respective officers, employees, agents, representatives and/or contractors; and
- (b) officers or employees of a governmental agency or instrumentality, permitting agencies, customs officials, candidates for political office and officials of public international organisations ("**Government Officials**") and political parties,

(collectively, "**External Parties**").

Employees must at all times guard against putting themselves at risk of any actual or perceived positions of compromise or conflict of interests. Employees are reminded to act in the best interests of the Company at all times in all dealings with External Parties.

1.1 Objective

This policy reaffirms the Group's commitment to maintaining high standards of business conduct and ethics, which are paramount to its long-term success. The Group does not tolerate ethical or legal violations, including corruption and bribery. This policy also provides clear limitations and guidelines to employees in relation to (a) the giving and receiving of any form of gratification (defined at Clause 2.2 below) to / from External Parties and (b) the receiving of any form of gratification from the Company which is outside the scope of their terms of employment with the Company.

1.2 Scope

- (a) This policy applies to all directors and employees in the Company, which include full-time, part-time, contract and temporary employees, as well as agency employees retained by the Company on a temporary basis ("**Employees**").
- (b) It also applies to all suppliers who have a business relationship with the Company.

2 Employees

The Group has in place an Employee Code of Conduct and Ethics ("**Employee Code**"), which sets out the standards of behaviour and business conduct that address, amongst other matters, corruption issues. The Employee Code is supplemented by other policies which reinforce certain aspects of business conduct and procedures when dealing with customers, External Parties and other stakeholders, including this Anti-Corruption, Corporate Gift & Hospitality Policy.

Under the Employee Code, Employees are responsible to comply with anti-bribery and anti-corruption laws, regulations and standards. In addition, Employees are responsible for reporting concerns/information on any fraud in connection with StarHub. The Whistle Blowing Policy sets out the procedure for reporting and investigating fraud cases in connection with StarHub's operations.

2.1 Laws on Giving and Receiving of Gifts & Hospitality

Employees should exercise good judgement when offering or accepting gifts and hospitality from External Parties as it could result in a situation of actual or perceived position of compromise or conflict of interest.

Employees shall comply with all applicable laws and regulations relating to the giving and receiving of any form of gratification (including but not limited to gifts, hospitality and favours) including the Penal Code 1871 and the Prevention of Corruption Act 1960 (and their successor legislations), which is the main piece of legislation which seeks to curb and penalise corruption and bribery practices in Singapore.

Under the Prevention of Corruption Act 1960, it is an offence for a person to corruptly solicit, receive or agree to receive, give, promise or offer any gratification as an inducement or reward to a person to do or not do any act. Any person convicted of an offence under the Prevention of Corruption Act 1960 can be fined up to S\$100,000 or imprisoned for a term not exceeding 5 years, or both.

2.2 Definition of Gratification

Gratification has been defined very broadly under the Prevention of Corruption Act 1960 and captures both tangible and intangible items of value, including but not limited to money, gifts, loans, fees, rewards, vouchers, commissions, valuable security, office, employment, contract, kickbacks, favours, benefits in kind, advantage of any description whatsoever, as well as any offer, undertaking or promise of any gratification.

2.3 Prohibition on Giving of any form of Gratification to External Parties

To avoid creating an appearance of being engaged in any improper behaviour, Employees are prohibited from:

- (a) giving any form of gratification (including gifts, hospitality and favours) of substantial value to such External Parties with whom the Company has ongoing, pending or potential business transaction(s); and
- (b) making any political donations or giving any other form of gratification (including gifts, hospitality and favours) to such External Parties who are Government Officials or political parties.

If in doubt, Employees are to seek approval from their immediate supervisors.

Employees are reminded to avoid any circumstances which may create an appearance that such gift, hospitality or favour is used to influence a competitive selection process, and unfairly affect a contract negotiation, procure preferential treatment or retain business.

Please note that it amounts to an offence under the Penal Code 1871 and Prevention of Corruption Act 1960 to corruptly give, promise or offer to any person any gratification as an inducement or reward for any person doing or forbearing to do anything in respect of any actual or proposed matter or transaction.

2.4 Prohibition on Solicitation & Acceptance of any form of Gratification from External Parties

Subject to the limited exceptions below, all Employees are strictly prohibited from soliciting and/or accepting any form of gratification from:

- (a) such External Parties with whom they may have ongoing, pending or potential dealings with in their capacity as Employees of the Company; and
- (b) such External Parties who are Government Officials or political parties.

If Employees have been offered any form of inducement or gratification by External Parties, they must report to their immediate supervisors without delay.

Gratification of any form must also be refused in any of the following circumstances:

- (i) if there is an ongoing, pending or potential business tender, negotiation, contract renewal or dispute with the External Party;
- (ii) if the gratification is intended to exert influence on the Company's ongoing, pending or potential business transactions involving the External Party (or its affiliates);
- (iii) the acceptance of such gratification would place the recipient Employee under an expectation to reciprocate or grant any preferential treatment to the External Party; or
- (iv) the acceptance of such gratification may unnecessarily create an appearance that the Company may be directly or indirectly involved in some form of improper practices.

All attempts must be made to refuse the gratification (whether in the form of a gift, hospitality or favour, etc.) or return the same to the External Party. However, if it is impracticable or

discourteous to return the same to the External Party, the recipient Employee must declare and surrender the gratification (whether a gift, hospitality or favour, etc.) to his/her immediate supervisor and Human Resource without delay.

2.4.1 Limited Exception to Prohibition: External Parties' branded mementos / souvenirs / perishables with no or minimal commercial value

The only category of gifts which may be accepted and retained by Employees without declarations are mementos/souvenirs/perishable items which have no or minimal commercial value such as External Parties' branded stationery, diaries, calendars, souvenirs, mementos, perishable items (for e.g. fruits, pastries and mooncakes). If in doubt, Employees must declare such gifts to their immediate supervisors without delay.

2.4.2 Limited Exception to Prohibition: Business Courtesies

Employees may, at the invitation of External Parties, accept business courtesies such as meals, public entertainment or refreshments at the External Parties' expense, provided that:

- (a) such meals, public entertainment or refreshments are not lavish or extravagant or exceed the reasonable value generally expected for such meals, public entertainment or refreshments;
- (b) reciprocity of any kind is not expected of the Employees accepting such business courtesies, whether directly or indirectly; and
- (c) Employees shall not accept invitations to or be involved in any private entertainment of any Government Official or political party.

While Employees are not required to declare occasional hospitality invites from External Parties, Employees must be mindful of the cumulative effect of accepting multiple hospitality invitations from the same External Parties, which could raise concerns as to the said Employee's objectivity and integrity.

Employees must be careful to avoid any circumstances which may create an appearance that such business courtesy is used to influence a competitive selection process, and unfairly affect a contract negotiation, procure preferential treatment or retain business. In particular, Employees must be mindful not to put themselves in any potential position of compromise or conflict of interest or create an appearance that the business courtesy has been extended as a condition to obtain business or any favours.

2.4.3 Express Prohibition on Trips Sponsored by External Parties

Employees must not accept sponsored trips (whether partial or in full) from External Parties.

All invitations of sponsored trips (whether partial or in full) must be brought to the attention of the Employee's Head of Division. Further, the CEO's approval must be sought before the Employee accepts such trips. As with all overseas business travel, the usual Business Travel Request Form must be completed and submitted accordingly. It is the Employee's responsibility to ensure that such trips are work-related and consistent with the Company's best business interest.

The sponsorship must not in any way influence, prejudice, create or be perceived to create a conflict of interest in any business negotiation or arrangement. The sponsorship must also not create an undue preference or compromise the competitive selection of any External Parties for the provision of any goods or services to the Company. If overseas travel is necessary, the trip shall be undertaken with the Company's prior knowledge and approval, and be in whole or in part at the Company's expense or as an integral part of the contractual obligation acceptable to the Company.

2.5 Allocation and Disposal of Gratification Received from External Parties

All gratification received from External Parties (whether in the form of gifts or hospitality) shall be properly accounted for. Human Resource will maintain a log that keeps track of the movement of the same declared and surrendered by Employees.

Human Resource shall safekeep any gifts surrendered by Employees, except where such gifts may be accepted and retained by Employees in accordance with the terms of this policy. The surrendered gifts may be donated to charitable organisations or given away during the Company's functions and/or on other occasions, at the absolute discretion of Human Resource.

In the event that the gift is personalised, the relevant Approving Officer shall have the absolute discretion to determine if the recipient Employee is entitled to retain the gift.

Value of Gift	Approving Officer
Less than S\$50	Head of Department / Division
S\$50 to S\$1,000	Head, Human Resource
More than S\$1,000	CEO

2.6 Acceptance of any form of Gratification from the Company

The receiving of any form of gratification from the Company (whether for value or otherwise) which is outside the scope of the recipient Employee's terms of employment with the Company shall be subject to the prior approval of the relevant Approving Authority under Section D (Disposals/Transfers/Asset Write-Offs) of the prevailing StarHub Group Operational Approval & Authority Limits.

2.7 Compliance with Policy

Employees found in breach of the Employee Code, this Anti-Corruption, Corporate Gift & Hospitality Policy or other applicable policies will face appropriate disciplinary and legal actions, including dismissal where required.

If an Employee has any doubt as to whether the giving or receiving of any gratification (including any gift or hospitality) would amount to an infringement of this policy, the Employee should not hesitate to seek guidance from his/her Head of Department / Division before giving or accepting any gratification.

If an Employee requires any further clarification on this policy, the Employee should contact his/her Department / Division's HR Business Partner.

3 Suppliers

All StarHub suppliers need to adhere to StarHub's Supplier Code of Conduct and other applicable local laws. The Supplier Code of Conduct is available on StarHub's intranet and corporate website for easy access by all employees and the public.

Under StarHub's Supplier Code of Conduct, suppliers shall adhere to the highest standards of ethical requirements to business integrity to prohibit corruption and bribery. Suppliers shall comply with all applicable laws and regulations in relation to the giving and accepting of gifts, including the Penal Code 1871 and the Prevention of Corruption Act 1960 (and their successor legislations).

Under this Anti-Corruption, Corporate Gift & Hospitality Policy, it is not acceptable for Employees to receive gifts, entertainment, hospitality or other gratuities from people with whom the Company does business, which may put Employees in actual or perceived positions of compromise or conflict of interests.

The Group prohibits the giving, soliciting or receiving of kickbacks, favours, hospitality, gratuities, entertainment, preferential terms or anything of value by Employees for their personal benefit from suppliers or their respective officers, employees, agents and/or representatives, which may or may be construed to influence the Employee's performance of his duties and affect his ability to act in the best interests of the Company.

Suppliers shall avoid any circumstances which might create an appearance that they have offered gifts, entertainment, hospitality or other gratuities to Employees to influence their contract negotiations or dealings with the Company.

4 Reporting Channels

- (a) In accordance with the Group's Whistle Blowing Policy, when an Employee, a supplier or an individual who is not an Employee or supplier has witnessed or becomes aware of a reportable incident involving ethical and legal violations or inappropriate behavior, he or she may raise the matter via any of the following reporting channels:

Email	whistleblow@starhub.com or AC_Chair@starhub.com
Mail	67 Ubi Avenue 1 #05-01 StarHub Green Singapore 408942 Attention: General Counsel or Audit Committee Chairman

All complaints will be promptly and thoroughly investigated, and the investigation will be dealt with in confidence and on a need-to-know basis in accordance with the Group's Whistle Blowing Policy.

- (b) Apart from the reporting channels above, Employees can also report any actual or potential violations of this policy to their immediate superior or escalate their concerns

to their next-level superior or to the Chief Human Resource Officer. All such complaints raised will be reviewed and appropriate follow-up action will be taken.

5 Exceptions to this Policy

Apart from the express terms of this policy, exceptions to this policy may be granted, on a case by case basis, in special circumstances. Any exceptions to this policy shall require the written approval of the CEO.