



Making Sustainability Count

Sustainability Report 2024





Making Sustainability Count

“Making Sustainability Count” underscores Smart’s unwavering commitment to integrating Environmental, Social, and Governance (ESG) principles into its core operations. This approach is not a mere marketing strategy, but a fundamental aspect of how we do business.

The theme reinforces that sustainability is not just about making promises or gaining publicity. It’s about delivering measurable impact, achieving tangible progress, and creating long-term value for the company, its stakeholders, and the wider community. This is driven by a robust strategic framework and Smart’s active role as a catalyst for positive change in the sustainability sector.

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For more information about Smart, please scan the QR code.

Since 2008, Axiata Group Berhad has held a majority stake in Smart Axiata, one of Cambodia's prominent mobile telecommunications operators. At Axiata Group, we are driven by a strong commitment to champion **digital empowerment and inclusivity** across Southeast and South Asia.

As part of the Group, and as we progress along our path toward **sustainable growth**, we remain focused on **delivering lasting value, fostering innovation, and reinforcing our market leadership** within the region.

We aim to do more than achieve financial success — **we strive to create real impact** by expanding opportunities, closing digital gaps, and supporting the aspirations of the people, communities, and countries we serve.



Digital Telcos



To meet the evolving digital needs of our Consumer, Home and Enterprise segments, our digital telcos deliver domestic and international connectivity solutions including mobile, fixed, ICT and converged offerings. These intelligent solutions empower our customers to thrive in an increasingly connected world.

Digital Businesses



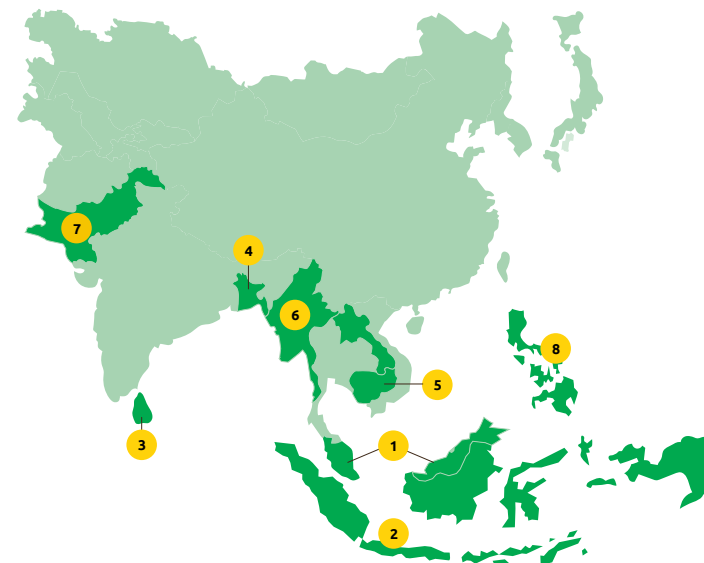
Our digital businesses utilise intelligence, innovation and data to provide digital financial services and facilitate digital and data transformation. Boost, a regional fintech leader, launched Boost Bank Berhad by Axiata and RHB Banking Group to expand financial inclusion and serve the underbanked and unbanked segments in Malaysia. ADA, a pioneer in data and analytics, empowers clients across Asia to leverage data as a strategic asset to drive growth and informed decisionmaking. ADL an innovative software service and solutions provider, assists businesses enhance operational efficiency and navigate the digital landscape.

Infrastructure



Our infrastructure businesses provide end-to-end integrated telecommunications infrastructure solutions and services, including tower leasing, colocations and custom-built sites as well as energy, transmission and Operations and Management (O&M) services. These services drive sustainable value by supporting thriving digital ecosystems. EDOTCO, the world's sixth largest tower company, owns and manages over 55,000 towers across Southeast and South Asia, while Linknet focuses on scaling fibre wholesale access service for Fibre to-the-Home (FTTH) in Indonesia.

Our Footprint Across ASEAN and South Asia



- | | | | |
|---|------------|---|-------------|
| 1 | Malaysia | 5 | Cambodia |
| 2 | Indonesia | 6 | Myanmar |
| 3 | Sri Lanka | 7 | Pakistan |
| 4 | Bangladesh | 8 | Philippines |

Smart Axiata Co., Ltd. is part of Axiata Group Berhad, one of the largest digital and telecommunications groups in ASEAN and South Asia. Smart is one of the prominent companies driving the advancement of digital and mobile technology in Cambodia. Sustainability is at the core of Smart's business decisions and activities, enabling us to create long-term positive impacts on the digital landscape, the lives of our employees, and our communities and businesses. Guided by our robust sustainability framework and that of Axiata Group, we will continue to create value and contribute towards a sustainable future for all, ensuring that no one is left behind.



► OUR VISION

To be the nation's **most trusted tech brand** for consumers and businesses by 2026

► OUR MISSION

We Connect.
We Make Lives Better.

► OUR VALUES

- Obsession for **CUSTOMERS**
- Courage for **CHANGE**
- Passion for **COLLABORATION**
- **COMMITMENT** for results

Our Sustainability Framework



Advancing Digital Society



Advancing Green Economy



Advancing People & Communities



Driving Governance & Risk

Making Sustainability Count



"At Smart Axiata, sustainability is not a side initiative—it's at the heart of how we operate and grow. We go beyond providing connectivity by embedding sustainability into our core business strategy and everyday decisions. We believe that true sustainability must be measurable, actionable, and impactful. And we're committed to inspiring our partners, communities, and the industry to do the same — because meaningful progress happens when we all make sustainability count."

Ritesh Kumar Singh
Chief Executive Officer
Smart Axiata

► **Sustainability is not a side initiative — it is the foundation of how we grow, operate, and contribute**

Dear Stakeholders,

We believe that progress is only meaningful when it is shared. As Cambodia continues its journey into the digital era, we stand not only at the forefront of innovation, but at the heart of national transformation. The rapid pace of technological advancement—from AI to cloud computing to 5G—is unlocking new frontiers for growth, but the true impact of these technologies lies in how they uplift people and communities.

That's why at Smart Axiata, sustainability is not a side initiative —it is the foundation of how we grow, operate, and contribute. We don't just connect people—we empower them. We don't just deploy technology —we make it count.



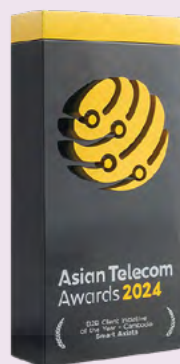
Cambodia is experiencing a pivotal moment in its digital evolution. While digital services continue to expand and benefit more segments of society, we recognize that **ensuring equitable access and participation remains a shared responsibility**. Progress must be inclusive, and sustainability must be intentional.

That's why this year's theme, "**Making Sustainability Count**," resonates deeply with us. While sustainability is sometimes seen as a branding exercise, at Smart, it is a core part of our strategy. It's not just the right thing to do for society—it's essential to our long-term success. Guided by our four sustainability pillars, we are driving meaningful progress in digital inclusion, climate action, community empowerment, and strong governance.

1. Advancing Digital Society

In today's world, connectivity is a gateway to opportunity. At Smart Axiata, expanding our network means empowering the communities we serve. In 2024, we extended **our 4G coverage to reach 93.1% of the population, deploying 429 new base transceiver stations to deliver fast, reliable access nationwide**. This continued investment ensures that more individuals, families, and businesses across Cambodia have the digital tools they need to thrive in an increasingly connected world.

Recognizing that **digital literacy is just as essential as digital access**, we launched the **Digital Literacy Guidebook**—a user-friendly, bilingual resource available both in print and online. Distributed widely to students and schools across the country, the guidebook helps Cambodians begin their digital journey with confidence. As part of our broader commitment to digital education and inclusion, our **CSR initiatives, under the EDISON Alliance, have reached over 64,823 beneficiaries**, breaking down accessibility barriers and enabling more people to actively participate in the digital society.



Asian Telecom Awards 2024
B2B Client Initiative of the Year
- Cambodia



Our **Smart for Business** initiative continues to expand, supporting enterprises of all sizes—especially **Small and Medium Enterprises (SMEs)**—with **affordable, scalable digital solutions**, from cloud tools and cybersecurity to IoT technologies. Backed by a dedicated team with deep industry knowledge, we help Cambodian businesses access cutting-edge ICT tools **without the burden of large upfront investments**, enabling them to embrace digital transformation, enhance competitiveness, and accelerate their journey toward growth and innovation.

We believe that building a **digital society** is not just about **megabits and machines**—it's about **equity, opportunity, and empowerment**. True inclusion goes beyond coverage and numbers; it means ensuring that a farmer in Kampong Cham can access real-time weather data, a student in Battambang can join virtual classes, and a small business in Siem Reap can compete in the digital marketplace.

These efforts are not just corporate social responsibility; they are investments in Cambodia's human capital and digital infrastructure that allow the nation to unlock its young and dynamic economy for decades to come.

2. Advancing Green Economy

As we advance in technology, we also take responsibility for our planet. We believe that **economic growth and environmental care must go together**, which is why our **net-zero 2050 commitment** is already in motion.

In 2024, we deployed **150 new solar-powered network sites** (totaling 1,684), upgraded our data centers to **save 11,000 kWh annually**, and improved waste management—**diverting over a ton of single-use plastics** from landfill.

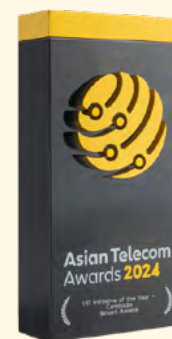
Beyond our own operations, we are proud to collaborate with the Ministry of Environment to advance climate action, including our support for the **Green Sprouts initiative**, which aims to grow **1 million saplings annually**. We also continue to champion nationwide sustainability through supporting initiatives such as the **Inland Ocean Festival** and the **National Eco-Pagoda Program**, helping to amplify green practices across communities in Cambodia.



Eurocham Cambodia
Technology Leader Award on
ESG Contest and Award 2024



3. Advancing Our People and Communities



Guided by our Winning Culture—centered on customer focus, adaptability, collaboration, and results—we continue to recognize and uplift our people, creating a company where every voice matters and everyone has the opportunity to succeed.

We extend our care beyond our team, **committed to ensuring that the benefits of technology reach everyone**. In 2024, we **empowered over 280,000 Cambodians** through digital skills training, education, and entrepreneurship programs, supported by more than **450,000 USD in community investment**.

We also take seriously our role in protecting Cambodia's youngest digital citizens. In partnership with **APPLE Cambodia**, we launched an **online reporting link** for child online abuse on Smart Axiata website and formally integrated **Child Online Protection** into our Code of Conduct—reinforcing our commitment to a safer digital environment for all.

To us, our people are not just employees, they are the heart of our company. We are committed to ensuring they are fairly treated, protected, and supported—through competitive benefits, inclusive policies, and a workplace culture that values diversity and wellbeing.

With 36% female leadership and over 34,000 hours of training delivered in 2024, we are building an inclusive, skilled, and future-ready workforce. Through global learning opportunities and continuous engagement, we empower our teams to grow, lead, and thrive.

4. Driving Governance and Risk

As digital adoption grows, so do the risks. Cyberattacks are now a top concern for businesses and individuals alike. By adopting **NIST Cybersecurity Framework 2.0** and achieving **ISO/IEC 27001:2022 certification** for our network and data center, we've set new benchmarks for digital trust.

Recognizing the critical importance of cybersecurity, we launched AI-powered security solutions and our **Global Security Operation Center (GSOC)** to detect and respond to threats, helping keep Cambodia's digital ecosystem secure and resilient.



As CEO of Smart Axiata, I firmly believe that cybersecurity requires more than just technology—it calls for strong governance, a steadfast commitment to data privacy, ethical leadership, and close collaboration across all stakeholders. We are dedicated to doing what is right to protect our users, partners, stakeholders and our business.

Looking ahead, our focus remains on delivering real impact and continuous improvement, guided by the theme **"Making Sustainability Count."** This reflects how we lead, operate, and create lasting value for everyone we serve.

Thank you for being part of this transformative journey with us. Our progress is a testament to the trust of our customers, the unwavering dedication of our team, and the strong support of our partners and government. Together, let us commit to embedding sustainability at the core of Cambodia's future—creating a greener, more inclusive nation where everyone can thrive.

PILLAR 1

Advancing Digital Society



Amid the rapid growth of the digital economy, Smart Axiata acknowledges the persistent digital divide—widened by limited connectivity and skills gaps—that continues to leave many behind. We are committed to bridging this divide to ensure everyone can thrive in a more connected world. Despite the challenges, our dedication to advancing digital inclusion remains steadfast. Our holistic approach focuses on expanding access to essential services like education, equipping individuals with the 21st-century skills they need, and supporting entrepreneurs to foster sustainable growth.

Sustainable Development Goals





Network Quality & Connectivity

We continue to strengthen network quality and connectivity to meet rising demand and support national development goals. Our focus remains on expanding coverage, improving reliability, and advancing digital infrastructure through innovation, automation, and sustainable practices.

Network Convergence, Digitization, and Automation

Total number of customers	Technology deployed	Number of base stations	Network coverage (by population)
7.5 million	GSM/Edge/LTE/LTE-A/eSIM	2G: 3,934 4G: 3,990	2G: 99.5% 4G: 93.1%

Expanding Coverage, Connecting Communities



In 2024, we deployed 429 new Base Transceiver Stations to expand 4G coverage. This effort enhances nationwide connectivity, improves service quality, and expands high-speed data access to more underserved communities across Cambodia.



Smart streamlined its fixed broadband and home internet process by automating fiber provider selection, cutting connection time from over a day to just second.



Network Quality & Connectivity (Continued)

Network Resilience and Reliability

► Network Availability and Incident Response

We maintain a 99.5% network availability rate by managing the installation, maintenance, and repair of core infrastructure, including towers, antennas, power systems, fiber cables, and generators. We will continue to leverage AI in our internal operations to enhance efficiency and strengthen network reliability by identifying and addressing network anomalies.

Impact:

Reduces downtime and provides customers with reliable access to keep operations running and maintain communication across devices, services, and networks.

► Enhances Network Reliability through Geographic Redundancy and Optimized Resource Distribution

We establish geographically redundant data centers and mesh-designed transmission systems with multiple paths, supported by strategically placed resources for swift preventive and corrective response.

Impact:

We power nearly 99% of off-grid sites using solar systems and standby generators to ensure continued service during outages.

► Energy Resilience at Off-Grid Sites

We power nearly 99% of off-grid sites using solar systems and standby generators to ensure continued service during outages and reduce reliance on the main grid.

Impact:

Reduces dependency on the national power grid in off-grid areas, minimizing the risk of service interruptions. Ensures continuous operations while advancing the use of sustainable energy solutions.



► Upskilling and Workforce Resilience

We deliver ongoing training to our field operation engineers to close skill gaps and equip them with the capabilities required for emerging technologies and systems.

Impact:

Improves work accuracy and reduces repair time. Supports employee development and strengthens staff retention.

► Organizational Structure Supporting Resilience

We structure Field Operations into four units covering transmission, regional field teams, radio and power systems, and data center operations to ensure continuity and effective network management.

Impact:

Improves coordination and speeds up issue response. Increases capacity to manage network challenges effectively.



Customer Experience

We improve customer satisfaction through enhanced digital channels, streamlined processes, and expanded nationwide retail presence. Our upgrades are guided by direct customer feedback to ensure faster, more secure, and accessible service delivery.

Customer Satisfaction

**Smart
ranked 1**

**in the market for three
consecutive years: 2022, 2023,
and 2024**

NPS Score for 2024

38%

NPS Score for 2022: 33.09%
NPS Score for 2023: 34.37%

tNPS for call center

80%

Digital Reputation Score

45%

Enhancing Customer Experience

Enhanced the SmartNas app by simplifying the top-up process, introducing gamification features, and integrating electronic Know Your Customer (eKYC) using facial recognition, AI, and machine learning across digital platforms.

**SmartNas's monthly active users
+31%.**

**Streamlined customer onboarding,
enabled faster in-app transactions,
and strengthened security through
digital identity verification without
requiring in-person checks.**

Launched Smart DakLuy, a service that allows prepaid users to request top ups from family or friends when unable to recharge.

**Enabled continued access to services
during low-balance periods and
supported uninterrupted connectivity
for prepaid customers.**

Introduced a redesigned Smart Axiata website with improved structure, faster page load time, mobile-friendly layout, and easier navigation.

**Increased accessibility to services
and information for customers across
all digital devices and improved
overall online experience.**

Opened 23 new Smart Shop Express stores, securing coverage across 21 provinces and expanding availability of customer support beyond major cities.

**Strengthened nationwide presence,
improved service delivery in
underserved areas and enhanced
customer convenience at physical
touchpoints.**



Customer Experience (Continued)

Enhancing Customer Experience

Upgraded Smart electronic Subscriber Identity Module (eSIM) with the capability to support up to five activations using a single QR code across multiple devices.

Enabled users to switch devices more easily, removed reliance on physical Subscriber Identity Module (eSIM) cards, and improved flexibility for mobile usage.

Deployed eKYC across the SmartNas app, Smart website, Smart Shops and dealer channels using facial recognition, AI, and machine learning for remote identity checks.

Reduced the need for physical verification, increased security of customer registration processes, and ensured compliance with regulatory requirements.

Installed connected queue machines in Smart Shops to manage walk-in customer flow and automate ticketing.

Reduced waiting times, improved service order handling, and enhanced in-store operational efficiency.

Rolled out over 300 Shop-in-Shop (SiS) locations through authorized dealers to provide basic services in community-based retail environments.

Extended Smart's reach into local areas, increased access to essential customer support, and strengthened retail network coverage.

Implemented Customer Day as a recurring quarterly program where Smart employees interact directly with customers at shops and call centers.

Collected direct feedback from customers, improved service understanding at all levels and supported faster resolution of service-related issues.

Redesigned the IVR system to feature proactive announcements that address common issues, introduced new flows for enterprise, home internet, and mobile users, and provided direct access to agents for high-value segments such as postpaid and home internet customers.

Improved routing of customer calls, allowed faster access to live support without repeated IVR prompts and led to a significant drop in call escalations since implementation.

Customer Feedback and Complaints

Smart reviewed existing policies and SOPs to identify gaps in customer complaint handling and is taking action to address the issues found.



Digital Inclusion

We expand access to digital education and services by supporting learning platforms, digital literacy programs, and inclusive technologies. Our efforts reach underserved groups, reduce the digital divide, and build capabilities across rural and marginalized communities.

EDISON Alliance

We focused on digital education as our main contribution to the EDISON Alliance by combining relevant programs with a digital learning platform. We also continue to strengthen the digital ecosystem through initiatives such as the Mekong Farm App and the Cambodia Digital Awards.

Under the “Education” focus area, we supported access to education that builds innovation and equips youth and women with essential digital skills. In 2024, our programs reached a total of 64,823 beneficiaries through the initiatives below:

BEEP	Code-C	Cambodia Digital Awards	Child Online Protection with APLE Cambodia through a reporting link	Digital Government Forum
1,440	2,300	210	15	10,609
Digital literacy program	Kid Kathon	Mekong Farm App	Online Safety Forum	STI Day
1,129	210	542	218	31,268
SmartStart ULP	Technovation Girls	Techno Preincubation	18th Annual Cambodian Science, Technology, Engineering, and Mathematics (STEM) Festival and Cambodia Robotics Olympiad	
1,330	662	125	14,765	

Total Number of Direct Beneficiaries* in our Digital Education Program: 64,823*

*Note: Direct Beneficiaries are the individuals, groups, or communities who immediately and directly receive the goods, services, or opportunities provided by the program.



Digital Inclusion (Continued)

Inclusive Access



Connectivity

Since the inception of the Universal Service Obligation Fund (USO) framework, we have successfully commissioned 84 base transceiver stations in close collaboration with the Ministry of Post and Telecommunications (MPTC) and the Telecommunication Regulator of Cambodia. These installations have strengthened connectivity and enhanced network access in rural communities across Cambodia.

Improved coverage and service quality have enabled better communication, easier access to information, and expanded opportunities for local businesses—contributing significantly to broader socio-economic development. We remain committed to partnering with MPTC to continue expanding connectivity in underserved areas.

Access to Vital Services – Education

Promoting Digital Education through Dedicated Products and Services

We introduced new product offerings tailored for learners to access educational content at a lower cost.

We introduced Digital Learning Add-Ons on the **SmartNas app**, allowing students to subscribe to plans designed for studying on the **EBC** and **Onesala platforms**. These plans are priced 60% lower than standard packages.

We also introduced **Smart Laor!** Rean Monthly, a monthly tariff plan that gives subscribers worry-free access to the **Educational Broadcasting Cambodia (EBC)** platform as well as other benefits.

Offering 1GB Daily Data through Educational Broadcasting Cambodia Partnership

We partnered with EBC to bridge the educational divide using our infrastructure and data offerings. The initiative promotes lifelong learning through digital platforms, enabling Cambodians to study at their own pace.

We provide 1GB data free to Smart Laor! users to access the EBC platform to **Smart Laor!** users.

Students registered on the **EBC** website can access the free data through **SmartNas**.

The initiative began at Hun Sen Serey Pheap High School, targeting 5,000 students, with plans to expand nationwide in the future.

Memorandum of Understanding (MoU) Signing

On 7 June 2024, we formalized our partnership with the EBC through an MoU signing ceremony at the Hyatt Regency Phnom Penh. This partnership supports students by improving access to quality education and narrowing the education gap between rural and urban areas through technology that lowers the barrier to learning.

More information: www.khmertimeskh.com/501509740/smart-axiata-ebc-sign-mou-for-digital-education-in-cambodia



Digital Inclusion (Continued)

Training for Digital Skills – Education



The Basic Education Equivalency Program (BEEP)

We supported BEEP, which provides flexible alternative education and skills training to out-of-school youth through digitally equipped learning centers, aligning with the government's TVET enrolment goal of 300,000 annually.

Since 2019, BEEP has expanded to 32 learning centers across 17 provinces, reaching over 3,338 learners.

Our 2024 contributions included 200 smartphones, 50 tablets, internet service to 10 BEEP centers, and data access for approximately 141 learners.

Total beneficiaries in 2024 : **1,017**

BEEP Project In Brief

BEEP supports school dropouts, individuals with disabilities, inmates and those unable to continue their education due to financial constraints by providing access to learning equivalent to a Grade 9 education.

The program helps learners build skills, gain a recognized certification, socially reintegrate, and qualify for Technical and Vocational Education and Training (TVET) programs.

As of 2024, BEEP operates 33 learning centers across 15 provinces and cities, including one correctional facility and 12 TVET centers, and has reached over 105 inmates and around 4 learners with disabilities through digital education.





Digital Inclusion (Continued)

Training for Digital Skills – Education (Continued)

Kid-KATHON

We partnered with Tech for Kids Academy to run Kid-KATHON 2024, a two-day program that engaged students from grades 7 to 9 in developing technology-based solutions to address global and local issues using micro:bit devices. The initiative aimed to promote critical thinking, teamwork, and innovation through problem-solving aligned with the UN SDGs.



The program received 104 applications, with 40 students shortlisted and grouped into eight teams. Participants received training in prototype development and explored global challenges within the SDG framework.

The event concluded with a public exhibition and live demo presentations attended by over 50 visitors.

Two teams received awards: Best Creative Team for developing a smart sensor that detects and alerts during forest fires and Best Innovative Team for creating a smart robot designed to sweep trash from public roads.

Total beneficiaries: **40**

Digital Literacy Program 2024

We partnered with the Ministry of Education, Youth and Sport, the Ministry of Post and Telecommunications, and TikTok to launch a digital literacy program that supports youth digital readiness.



This culminated in a series of workshops across four provinces, where 51 trainees, comprising volunteer students and Smart employees, were trained and later facilitated sessions for 1,268 high school students.

The program covered digital literacy, responsible online behavior, TikTok community guidelines, and video editing. Students worked in teams to produce 85 educational videos, strengthening both their practical skills and awareness of safe digital practices.

Total beneficiaries: **1,129**



Digital Inclusion (Continued)

Training for Digital Skills – Education (Continued)

Code-C Program

We partnered with the Cambodia Academy of Digital Technology (CADT) to support Cambodia Coding Festival (CODE-C) 2024, a national platform advancing digital skills and innovation among Cambodian youth.



2,300 participants from various sectors attended the event, including software development, digital technology, private enterprises, development partners, startups, and students.

The event featured 6 digital product demos, 68 expert speakers, 50 exhibitors, and 40 workshops and masterclasses.

These sessions provided access to emerging trends, practical skills, and industry knowledge, helping participants build digital capabilities and expand career opportunities.

More information: <https://cadt.edu.kh/news/code-c-developer-conference-2024/>

Total beneficiaries: **2,300**

BarCamp Battambang 2024

We partnered with the CADT to expand digital opportunities for youth in Battambang and surrounding provinces, where access to advanced digital skills remains limited. The program equips young people with competencies in emerging fields such as generative AI, career development, agritech, data analytics & data literacy, smart city solutions, cybersecurity & blockchain technologies, and digital marketing & content creation.

Over 2,000 students from 11 schools and universities attended the event.

The event offered exposure to learning, networking, and exploring career pathways.

More information: <https://cadt.edu.kh/news/barcamp-battambang-2024/>

Total beneficiaries: **2,000**

The 18th Annual Cambodia STEM Festival and Cambodia Robotic Olympiad

We supported the 18th Annual Cambodia STEM Festival (ACSF) and the Cambodia Robotics Olympiad (CRO), held on 10 and 11 May 2024, brought together around 10,600 students, educators, industry professionals and government representatives under the theme "Sustainability through Green Innovation." This was followed by the CRO on 14 September 2024, which gathered over 4,000 attendees, including students who competed in robotics competitions.

More information: <https://stemcambodia.ngo/services/annual-cambodian-stem-festival/>

Total beneficiaries: **14,600**



Digital Inclusion (Continued)

Innovation and Inclusive Services

Smart Axiata Digital Innovation Fund (SADIF)



Nham24

In December 2024, Smart Axiata Digital Innovation Fund (SADIF) facilitated the merger between Nham24 and Grab, a landmark transaction expected to inspire future tech entrepreneurs and attract international investment to Cambodia's startup ecosystem.

Okra

SADIF's seed round investment supported the successful delivery of Okra's mesh-grid solar electrification pilot project in Cambodia. The project became the basis for Okra's expansion to four countries and 124 villages, providing more than 37,000 people with access to clean and affordable energy.

Morakot

Morakot provides core banking systems and other digital solutions to 44 enterprise customers in Cambodia and Myanmar. Its platform has helped enable over 300 million USD in loans and supported more than 250,000 borrowers, contributing to improved access to finance.

Note: SADIF exited Nham24 in December 2024 through a regional merger, while its remaining four investees continue to drive impact across energy access, financial inclusion, and digital solutions.

Number of customers served under SADIF investment: **1,287,000**

Innovation for Social Impact

ចូលរួមលើកកម្ពស់វិស័យកសិកម្មកម្ពុជា
ដោយប្រើដំណោះស្រាយឌីជីថល



Mekong Farm App

Smart Axiata supports the Mekong Farm App to strengthen Cambodia's agricultural sector by providing farmers with access to expert content, community discussions and weather updates. As of now, the app has 1,034 registered users, 328 Q&A discussions and 1,461 views on farming guidelines. To expand its reach, Smart partnered with Greenovator to send Short Messaging System (SMS) alerts guiding farmers on how to use the platform.

More information: <https://www.greenovator.co/products/mekong-farm>
Total beneficiaries: **1,034**



Digital Inclusion (Continued)

Digital Services for Business and Entrepreneurs

We aim to be the preferred Information and Communications Technology (ICT) partner for businesses of all sizes.

For large enterprises, we deliver added value through services ranging from broadband and dedicated internet to managed services, cybersecurity, and analytics.

For SMEs, we offer one-stop solutions with productivity tools such as Smart CheckinMe for workforce management, Virtual Desktop Infrastructure to lower capital costs and Mobile Device Management (MDM) to secure mobile assets and corporate data.

The services we provide are as follows:



Managed Wi-Fi

We reduce upfront network investment by shifting capital expenses to operational costs, allowing businesses to allocate budgets more effectively and focus on core operations without the need to manage their local network infrastructure.

Cybersecurity and Mobile Device Management

We protect digital assets such as customer data, business performance data, and digital touchpoints from cyber threats, giving businesses confidence that their information is secure and operational risks are minimized.

Analytics

We help businesses identify the right market segments and locations, ensuring marketing efforts are directed where they bring the most value and avoiding unnecessary investment losses.

Push-to-Talk over Cellular for Mission Critical Communication

We improve employee safety during mission-critical situations, enable real-time group communication across retail stores and allow business owners to monitor team activity for better operational control.

Virtual Desktop Infrastructure

We enhance operational efficiency by centralizing data security, reducing the cost of fixed hardware, and software, supporting remote access and improving user experience through over-the-air system deployment.

Smart CheckinMe

We enable business owners to manage employee attendance, monitor daily productivity, and access performance reports remotely, improving workforce efficiency and visibility.



Digital Inclusion (Continued)

Empowering Marginalized Communities

Women and Girls

Technovation Girls Cambodia

In 2024, we supported 622 female students from more than 12 provinces to develop their skills in technology, business, and digital innovation.

Over 12 weeks, participants took part in sessions covering idea development, coding, business fundamentals, presentation skills, and artificial intelligence. At the end of the program, 57 teams made up of 237 students submitted their final projects internationally.

The program ended with a national showcase, where 12 teams were selected to present their work. Four were awarded across core categories: overall winner, young entrepreneur, new entrant, and audience choice.

The National Grand Prize Winner, GCodey, was rewarded with a three-day study trip to Singapore to explore the city's technology and entrepreneurship landscape. The visit included learning engagements at Grab Headquarters, Kaplan Higher Education Academy, and Block 71.



Safe and Responsible Use of Technology

GSOC

We launched our GSOC service to help businesses of all sizes and sectors protect against cybersecurity threats and safeguard customer data. The service includes threat penetration testing, vulnerability assessment, and network monitoring, with operations aligned to ISO 27001 data security standards.





Digital Inclusion (Continued)

Safe and Responsible Use of Technology (Continued)



MoU on Child Online Protection with APLE Cambodia

We partnered with Action Pour Les Enfants (APLE) to help protect children online, following findings from the “Cambodia Disrupting Harm” report that over 11% of children aged 12 to 17 face online sexual exploitation or abuse. The partnership includes a reporting link on Smart’s website and resources to equip children with safe online practices.

More information: <https://cambodiainvestmentreview.com/2024/07/31/smart-axiata-ministry-of-post-and-telecommunications-join-forces-for-safer-internet/> and <https://www.smart.com.kh/protect-cambodian-children>

Educational Content to Users

We work with the Telecommunication Regulator of Cambodia (TRC) to promote digital safety and raising awareness on child online protection, the ban on explicit content, and child rights under Cambodia’s labor laws.

Sharing Awareness Content on Social Media

We use our official Facebook and LinkedIn platforms to raise awareness on online safety and cybersecurity via practical tips such as creating strong passwords and recognizing phishing attempts, helping users protect their personal data and stay secure in the digital space.

Child Online Protection

We focus on protecting children from online threats by helping parents and caregivers understand the importance of digital safety and how to support safe internet use for children.

Prohibition of Explicit Materials

We work to prevent the distribution of harmful content by running awareness campaigns that reinforce the legal and ethical responsibilities of online users, promoting safety and respect across digital platforms.

Supporting Child Rights and Labor Laws

We advocate for the protection of children's rights by ensuring they are not exposed to digital exploitation and are supported in their access to education and development in a safe environment.



Digitization and Innovation

We modernize legacy platforms through containerized architecture and introduce advanced features across core systems to improve service performance. We also invest in AI experimentation and data governance to ensure secure, scalable, and responsible digital transformation.

IT Transformation

Our aim is to modernize outdated platforms by adopting containerized architecture and introducing new features, such as:

- ▶ Modernizing the digital Customer Relationship Management (CRM) platform with containerization and added features such as Internet of Things (IoT), SMEs support, multi-SIM capability, and machine learning.
- ▶ Upgrading the enterprise CRM to enhance the web portal with full end-to-end self-service.
- ▶ Adopting eKYC across all touchpoints including retail, dealer, web, and the SmartNas self-care app.
- ▶ Upgrading the Interactive Voice Response/ Unstructured Supplementary Service Data (IVR/USSD) platform with containerization and implementing full redundancy disaster recovery.
- ▶ Enhancing the campaign platform to enable real-time, event-based campaign execution.
- ▶ Implementing the first Vector DB for face search and eKYC fraud detection.

Maximizing Value through AI

Generative AI Experimentation

We provide sufficient resources for in-house talent to explore and test generative AI technologies. This has led to the development of a proof-of-concept solution, marking a concrete step toward realizing AI's intended impact within our operations.

Establishment of Data Governance Council

We are establishing a Data Governance Council to ensure data is treated as a corporate asset and consumed responsibly to support our goal of achieving data maturity where all stakeholders understand how to handle data securely and in line with relevant regulations.

Smart Enterprise Solutions for Sustainable Development

Big Data Service

We provide mobility insights and heatmap data to identify hotspot locations, helping government agencies focus efforts on public service planning and enabling SMEs to determine optimal business locations.

Internet and Private Line for Banks and Other Companies

We support nationwide digitalisation to enhance financial performance monitoring by the government, enable businesses to connect multiple locations and reduce the financial divide between urban and rural areas.

SME Productivity Tools

We enable businesses to increase productivity through digital tools such as Smart CheckinMe, Push-to-Talk and Fleet Management, contributing to higher Gross Domestic Product (GDP). Improved business outcomes lead to greater community returns, including higher employment rates and access to practical skill-building opportunities.

PILLAR 2

Advancing Green Economy



Smart Axiata is dedicated to advancing a green economy by actively promoting climate action and embracing the principles of a circular economy. This commitment reflects the company's recognition of the urgent need to address environmental challenges and foster sustainable development.

Sustainable Development Goals



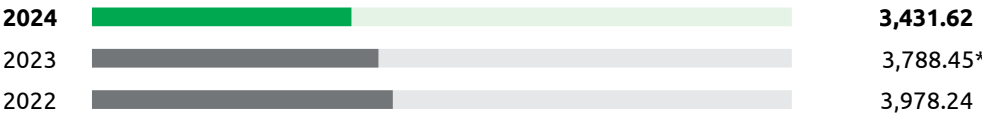


Climate Change

We are committed to becoming a net-zero carbon company by 2050 by monitoring and reducing our greenhouse gas (GHG) emissions. This includes assessing our climate risks, advancing circular economic solutions, and aligning our disclosures with global emissions reporting standards, reflecting our support for GSMA's goals for the mobile sector while championing the transformation of connectivity and digitalization.

GHG Emissions by Year (tCO₂e)

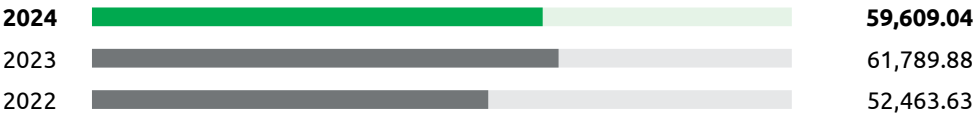
Scope 1 (tCO₂e)



Scope 1:
-9.4% against 2023 due to solar energy utilization

*Adjusted based on audited number

Scope 2 (tCO₂e)



Scope 2:
-3.5% against 2023 despite higher electricity usage due to the national grid's shift toward greener source of energy

Scope 3 (tCO₂e)



The 2024 data are currently undergoing verification.

Total Emissions of Scope 1 & 2



*Audited number.



Scope 1 & 2:
-3.8% against 2023 despite an annual increment of data consumption of over 10% annually

Source of Conversion Factor



Electricity
Grid Emission Factor (tCO₂e) for Cambodia:
0.0003973 tCO₂e/kWh
per International Energy Agency (IEA) Emission Factor 2022



Diesel
0.00291 tCO₂e/liters
per conversion emission factor database of the Intergovernmental Panel on Climate Change



Petrol
0.002288 tCO₂e/liters
per conversion emission factor database of the Intergovernmental Panel on Climate Change



Climate Change (Continued)

Turning Climate-Related Risks into Opportunities

As part of our climate journey, we identify climate-related risks and capture opportunities to adapt to climate change, enabling us to decarbonize our network operations while contributing to the transition to a low-carbon economy.



IMPACT STORY

Reducing Network Energy Consumption

To lower our network energy consumption and reduce carbon footprint, we optimize energy usage by enhancing energy efficiency and increasing the usage of renewable energy.

PowerCubes

We deploy PowerCubes at telecommunication sites to establish reliable power infrastructure efficiently, supporting the operations of network equipment and ensuring seamless service delivery to customers. This saves operational costs including manpower, materials and project management. PowerCubes, which serve as a primary power source in regions with inconsistent or non-existent grid power, ensure that network services are not disrupted during power outage.



Number of sites deployed with PowerCubes as of 2024: **168**

iPowerStar 2.0

We have been collaborating with Huawei since 2023 to implement iPowerStar 2.0, an AI-powered energy optimization solution that regulates power consumption of base stations based on real-time user demand. This system is an upgrade of iPowerStar 1.0, which has been used to enhance energy efficiency in Smart's network operations since 2018. It reduces energy consumption by using intelligent algorithms to predict traffic patterns and prioritize active cells during peak demand.



Energy saved with iPowerStar 2.0: **6%**

Intelligent Digital Management Unit (iDMU)



We implemented iDMU, which dynamically manages network capacity by shutting down low-traffic cells during nighttime, enabling substantial energy saving.

Number of sites with iDMU: **74**

Modernized Data Centers



We modernized our data centers by upgrading the cooling system from downflow to in-row, lowering our energy consumption, and operational costs.

Reduction of energy consumption: **~11,000 kW/year**



Climate Change (Continued)

Increasing Solar Energy

We continue to utilize clean energy by expanding our renewable energy initiatives. In 2024, we deployed another 150 new solar sites as part of our commitment to increasing network renewable energy consumption.



Number of Solar Sites within Smart's Network

2024		1,684
2023		1,534
2022		1,239

Raising Suppliers' Awareness

We engage with our suppliers to increase their sustainability awareness and promote collaborations in environmental stewardship. During the launch of Smart Axiata's 2023 Sustainability Report, we invited our top five suppliers whose operations have a significant environmental impact on the materials we use in our products. The event enabled the suppliers to better understand our challenges featured in the report, apart from the best practices related to climate change and sustainability.



Say No to Child Labour

Together, we work towards a future where every child is empowered to thrive, free from exploitation.



Enhancing Carbon Removal and Carbon Avoidance

Energy Efficiency

We relocated equipment from the data center to the containment area to optimize energy consumption and cooling efficiency.



Waste Heat Recovery

We installed advanced in-row cooling systems to cool targeted areas where heat is generated, reducing the need to cool the whole containment area, leading to energy savings and lower operational costs.

Off-Grid to Grid Initiative

We are shifting from off-grid to grid connections for a reliable and uninterrupted power supply, reducing our diesel consumption and carbon footprint. The transition also increases scalability and flexibility to meet growing telecom network demand and avoid the high costs of maintaining off-grid systems.

Number of sites converted:

2024: 23 sites
2023: 30 sites



Environmental Management

Smart Axiata champions environmental stewardship through collaboration, partnerships, and implemented sustainability practices such as managing waste responsibly, conserving water and protecting biodiversity to drive progress toward a circular economy and a greener future for Cambodia.

Sustainability Week

In conjunction with the launch of Smart Axiata's 2023 Sustainability Report, a Sustainability Week was organized in August 2024 to raise sustainability awareness and promote sustainable behaviors among employees and customers. The initiative was held at four stores in high-traffic locations: Smart Shop Monivong, Smart Shop Nehru, Smart Shop Takhmao, and Smart Shop Steung Meanchey.

Among the highlights of the events were:

- ▶ A Sustainability Awareness Cube was set up at each store to promote Smart Axiata's sustainability agenda to employees and customers.
- ▶ A Sustainability Impact Video was showcased to highlight the importance of eco-friendly practices.
- ▶ Encouraged Smart office teams to rethink their everyday habits by challenging norms and embrace sustainable practices.
- ▶ Encouraged employees and customers to conserve water and energy.
- ▶ Encouraged employees to bring their own meals to work, order food from eco-friendly eateries, and use reusable water bottles.
- ▶ Employees wore T-shirts with key messages from Smart Axiata's Sustainability Report, emphasizing our commitment to green initiatives.

The Youth Debate on Environment 2024

The Youth Debate on Environment 2024 was aimed at promoting environmental awareness and encouraging youth to contribute to a sustainable future. Jointly organized by Smart Axiata, the Ministry of Environment, and the Ministry of Education, the event saw high school students debating on urgent environmental issues while sharing their knowledge about environmental behavior.



Number of beneficiaries: **> 450 students, 8 high schools, 5 provinces**

National Eco-Pagoda with the Ministry of Environment



The National Eco-School and Eco-Pagoda Guideline Dissemination 2024 aimed to promote environmental awareness and sustainable practices across Cambodia. Held under the themes "Today, I Don't Use Plastic Bag" and "Clean Cambodia, Khmer Can Do", the initiative educated religious leaders, teachers, students, and relevant stakeholders about the newly published Eco-School and Eco-Pagoda Guidelines, fostering a nationwide shift toward eco-friendly habits, especially on plastic reduction. Smart Axiata collaborated with the Ministry of Environment, and the Ministry of Education, Youth and Sports to promote the initiative.

Number of beneficiaries: **> 45,000 individuals**



Environmental Management (Continued)

Second Inland Ocean Festival

Smart Axiata partnered with BambooShoot Foundation and Ocean Recovery Alliance to organize the second Inland Ocean Festival. The event was aimed at improving the ecosystem and livelihoods of the communities surrounding the Tonle Sap by reducing plastic pollution and recycling.

Impacts of the festival:

- Educational outreach engaged **994 families** in Kampong Phluk, equipping them with essential information and resources to improve household environmental practices. The outreach was complemented by the “Clean Family” certification program, which increased significantly from **32 certified families in 2023 to 239 families in 2024**.
- Supported by the **Harvest Plastic Collection** initiative, which led to the collection of **3,366.3kg** of plastic waste by the local community.

Number of beneficiaries: **16,068 individuals**



IMPACT STORY

Internal Waste Separation and Plastic Recycling Project

As part of our ongoing commitment to environmental sustainability, we continued to tackle the rising problem of single-use plastics by enhancing our waste reduction initiatives in our offices and Smart Shops.



Waste Separation Bins

- Started in October 2024 in collaboration with Gomi Recycle Cambodia.
- Waste separation bins were placed in four main offices and most high-traffic Smart Shops: Smart Shop Phnom Penh Center, Smart Shop Nehru, Smart Shop Monivong, Smart Shop Chrouy Changvar, Smart Shop Takhmao, and Smart Shop Riverside.

Impact: Recycled **1.11 tons** of single-use plastics



Environmental Management (Continued)

Water Management

We remain committed to water conservation by monitoring water usage across all offices nationwide, enabling us to identify trends, improve efficiency, and promote responsible water management.

DO'S AND DON'T WHEN USING WATER



DO'S

- Do keep your shower short, sweet and water saving.
- Do inspect your pipes for leakage.
- Do keep an eye on the water bill. It'll help you monitor your water usage.
- Do teach your kids or siblings on how to save water and reward them.



DON'T

- Don't flush the toilet excessively.
- Don't let your tap flow while brushing your teeth.
- Don't waste food. It takes a lot of water to grow them.
- Don't use water excessively. You should be able to evaluate how much is too much.

SUSTAINABILITY WEEK



Total water consumption (liters)

2024:
approx. 13,400,000*

*Across 70 shops and facilities. Water consumption increased due to the expansion of Smart Shops across Cambodia.

2023:
10,848,732**

**Across 40 Smart premises, including Smart offices, warehouses, and Smart Shops throughout the country.

Tree Planting Campaign with the Ministry of Environment

Tree Planting Campaign with the Ministry of Environment

In our commitment to preserving the environment, we continue to work closely with the government and promote national green campaigns through our digital platforms, including Short Messaging System (SMS) blasts, mobile app notifications, and social media channels. In 2024, we collaborated with the Ministry of Environment to continue fostering a positive environmental change.

- ▶ We participated in the National Orchid Forum and Tree Distribution Exhibition in July 2024 to celebrate National Tree Planting Day on 9 July. **35,000** individuals took part and supported Cambodia's national greening efforts.
- ▶ We signed a MoU with the Ministry of Environment on 19 December 2024 to support the government in generating **1 million** saplings annually through the Green Sprouts initiative.



PILLAR 3

Advancing People & Communities

Smart Axiata is committed to fostering positive change within our organization and communities. We empower our workforce through inclusive development anchored in Diversity, Equity, and Inclusion (DEI), while our *Advancing People & Communities* agenda equips Cambodians with digital skills, knowledge, and entrepreneurial capacity to unlock opportunities, strengthen resilience, and thrive in a sustainable, inclusive future.

Sustainable Development Goals





Fair, Diverse, and Inclusive Employment

Fairness, diversity, and inclusion are critical to fostering a Winning Culture where every employee feels valued and supported. To foster a culture of diversity and inclusivity, we provide equal opportunities for all, regardless of age, gender, nationality, culture, or religion.

Winning Culture

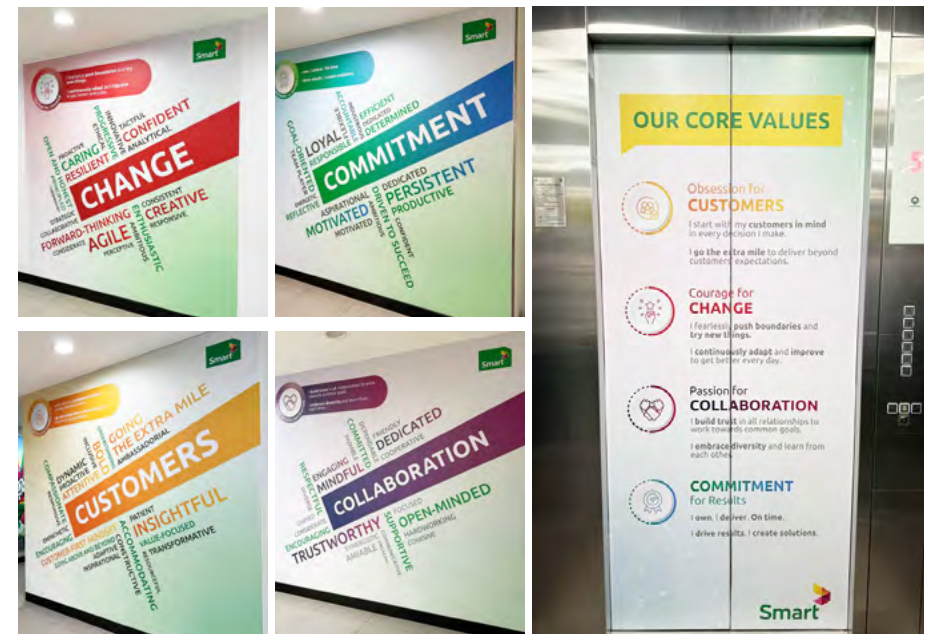
In March 2024, we adopted Axiata Group's Winning Culture with refreshed core values—Obsession for Customers, Courage for Change and Passion for Collaboration—while adding our own value, "Commitment for Results".

- The framework guides our efforts to embed fairness, inclusivity, and diversity in the workplace, building a high-performing team.
- We implemented initiatives such as embedding the core values into onboarding, daily behaviors, peer recognition, leadership engagement, and a new Behavior Recognition Program to firmly integrate these values into our culture.



► Integrating Core Values into Smart Axiata's Premises

Our core values are prominently displayed on various floors of the Smart Axiata headquarters and other offices to remind employees to behave in accordance with these values. We have designed a framework that helps employees to integrate core values into how they conduct business operations, make decisions, and communicate.





Fair, Diverse, and Inclusive Employment (Continued)

Employee Code of Conduct (CoC)

Smart Axiata's Code of Conduct serves as a compass for ethical and responsible behavior, guiding our employees to act with integrity, respect, and accountability while upholding the trust of customers, communities, and stakeholders.

We are committed to maintaining the highest standards of ethical and professional conduct. All employees are required to review, understand and adhere strictly to our CoC.

Diversity, Equity, and Inclusion

► **17%** women's board representation

► **36%** women's representation in senior management

► Female staff: **35%** (479)

► **1,347 Cambodian** employees

Building an Inclusive Culture across Smart Axiata

We believe diversity fuels innovation by integrating a wide range of perspectives and ideas. Building an inclusive workplace ensures employees feel a sense of belonging and appreciation, empowering them to maximize their potential and contribute meaningfully.

Promoting Gender Equality and Women Empowerment

We support women's advancement in society through initiatives designed to build their confidence and skills in critical areas necessary for future success.

- Smart Axiata celebrated International Women's Day on March 8, 2024, honoring the remarkable women in our workplace and worldwide.
- During the 2024 Pchum Ben festival, we celebrated Smart Cultural Day, an event designed to highlight the power of diversity and unity in our workplace. Employees from over 10 countries participated by wearing traditional attire and sharing their traditional cuisines, creating a vibrant atmosphere.





Fair, Diverse, and Inclusive Employment (Continued)

Employee Engagement



We give our employees a voice through platforms such as surveys, pulse checks, town halls and feedback sessions to collectively improve the workplace. Listening to our employees and addressing their key concerns is more important than ever. Our Employee Engagement Survey enables us to continually refine our practices by allowing our workforce to communicate what works and should be maintained to create a conducive workplace. In 2024, we achieved a **100%** participation rate, reflecting our employees' care for our collective welfare and confidence that they will be heard by management.

We utilize Employee Engagement Score (EES) to measure employee satisfaction and identify their needs. In 2024, our EES was **80%**, a high score compared with industry benchmarks.

2024
80%

2023
84%

2022
79%

We integrate our Winning Culture into our staff engagement and communications initiatives through several initiatives that include:

► Appreciation Week

Appreciation Week was held from May 20 to June 2, 2024 to recognize the valuable contributions of all employees on International Labor Day. This initiative emphasize the importance of collaboration, encouraging colleagues to express gratitude for each other's dedication to Smart Axiata's core values.

During the two-week program, employees were provided with three gratitude cards to share with their colleagues, with additional cards available from the Employee Engagement & Culture team. Employees wrote down how their colleagues upheld Smart Axiata's core values in their daily actions.

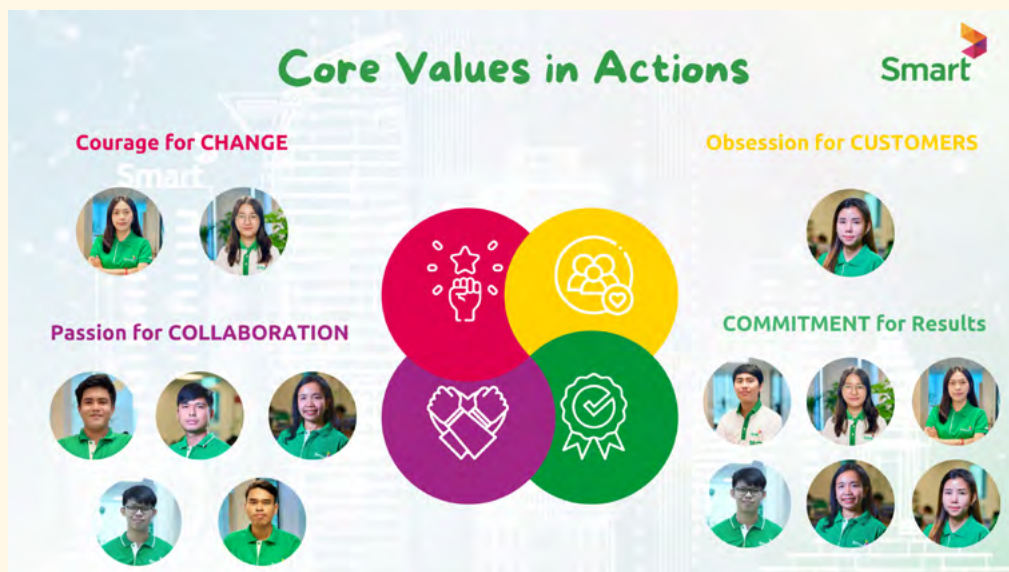
The cards were distributed by department heads at headquarters and Smart Shop supervisors in other locations, while E-Gratitude Cards was also provided for expressing gratitude to colleagues in different locations.





Talent Development and Attraction

Performance Management and Recognition



We believe that our people are our greatest asset. To bring out the best in our workforce, we equip them with skills, tools and guidance to motivate them to excel. Our support begins at the point of onboarding and continues throughout their journey in Smart Axiata.

We drive performance through a structured framework encompassing clear Key Performance Indicator (KPI) alignment, continuous performance monitoring, mid-year and annual reviews, promotion assessments, and outcome-based rewards including bonuses and salary increments.

Talent Factory: Leadership Development and Talent Growth

We equip our managers and supervisors with the necessary skills to demonstrate daily leadership and build high-performing teams through targeted programs focused on coaching, trust-building and feedback.

- **Advanced coaching:** Our senior leadership learned about the importance of coaching and how they can embed the practice into their team's day-to-day operations.
- **Coaching skills:** Heads of departments, managers, supervisors, and anyone with team members were taught to coach effectively and help their teams to grow.
- **Experienced leaders:** Heads of departments were trained in building trust, developing high-performing teams, and giving feedback.





Talent Development and Attraction (Continued)

Learning and Development

We are committed to ensuring that our people continue to upskill and remain relevant with the latest industry knowledge and demands. This includes providing them with essential technical and functional skills to navigate current and future challenges.

Total training hours:
over 34,000

Total employees that received training:
1,177 (86%)

Total Training Hours by Employee Category

Senior Management
(CEO, CXOs, and CEO direct reports):
over 290

Mid-management:
over 3,400

Executive:
over 20,300

Non-executive:
over 10,000

Other:
1*

*"Other" refers to employees who are not assigned to specific job bands.

Mandatory Compliance Training

All employees, both new joiners and existing staff, are required to complete the following mandatory courses:

- For New Joiners:
 - CoC
 - Whistleblowing
 - Introduction to Information Security
 - Malware Awareness
 - Mobile security
 - Responsible browsing
 - Social engineering
 - Data privacy
 - Risk and Business Continuity Management (BCM)
 - Ethics and compliance
- For Existing Employees (Ethics and Compliance Related Courses):
 - Whistleblowing
 - Data privacy
 - Risk Management
 - Cybersecurity



Targeted Training Initiatives

In 2024, Smart Talent and the Organizational Development team introduced the following initiatives:

- **Tech & IT Training:** Covered automation, cloud, CRM systems, Development and Operations (DeVOps), and electronic Customer Relationship Management (eCRM), alongside hands-on coaching in agile project management and AI-driven customer service innovations.
- **Brown Bag Sessions:** Fostered a culture of sharing and learning in Smart Axiata, increasing cross-functional collaboration. Beginning in March 2024, **17** sessions were organized, involving **428** participants who shared their various job functions over 18.5 learning hours.
- **Toastmasters Sessions:** Enhanced employee confidence in public speaking and conversational English across six months for **20** learners in bi-weekly sessions.
- **Smart Education Sponsorship Program:** Revamped to support employee-led upskilling, with increased funding for short-term courses and expanded access to international programs for long-term professional development. In 2024, we sponsored **five** employees for long-term professional development and **13** employees for skills development.



Talent Development and Attraction (Continued)

Employer Branding

Our Life@Smart social media platforms on LinkedIn, Telegram, and Facebook play a key role in projecting our dynamic work environment, core values, and achievements. These platforms help us form meaningful connections with prospective candidates while reinforcing our employer value proposition and Smart's image as a top employer in the country.

over 45,000

followers on Facebook
by end-2024

over 6,000

followers on LinkedIn
by end-2024

over 5,200

followers on Telegram
channel

Smart Digital Intern Program

Five cohorts have successfully completed the program, and it continues to serve as a critical pipeline for emerging talent. Many interns have transitioned into full-time roles, reflecting our commitment to developing future-ready professionals across key business functions.



Smart x University Experience Tour

Through immersive on-site visits, we provide university students—from local institutions such as CamEd Business School to international partners like the National University of Singapore—with firsthand exposure to Smart's operations, work culture, and career opportunities. These visits bridge the gap between academic learning and industry practice, positioning Smart Axiata as an employer of choice among young professionals.



Smart Career Workshop and Fair

Designed to creatively expand our recruitment reach, this program equips participants with foundational sales knowledge and product insights. It enhances our recruitment experience while preparing candidates to integrate seamlessly into roles at Smart Axiata.



Employee Health, Safety, and Wellbeing

We believe that ensuring employee health, safety, and wellbeing is fundamental to building a conducive workplace. In prioritizing our people, we implement comprehensive safety measures, protocols, and initiatives to prevent accidents, illness, and promote overall wellness.

Health and Safety

We are forming an Occupational Safety and Health (OSH) committee to fulfill a necessary role in our health and safety agenda. We aim to completely establishing this committee in the first quarter of 2025.

Number of fatalities:

0

Lost time incident frequency rates (LTIFR):

- Q1: **89.74** hours
- Q2: **30.48** hours
- Q3: **3.19** hours
- Q4: **0** hours

Number of employees trained on health and safety standards:

154



Employee Wellness and Wellbeing

We promote a holistic approach to healthy lifestyles that encompass physical and mental wellness.

- **12th Phnom Penh International Half Marathon:** **80** of our employees participated in this public event held in June 2024.
- **Smart Blood Donation:** We held **two** blood donations drives in July and November 2024 that were open to internal and external volunteers.





Community Development

We aim to create enduring, positive change within our communities by understanding local needs and empowering the underserved by offering digital skills, educational opportunities, and financial and non-financial support. We aspire to shape Cambodia's next generation of leaders and build a digitally inclusive future through STEM.

Amount invested in local communities*:

461,592 USD

Number of direct beneficiaries:

281,374

*Target beneficiaries are external parties.

Employee Volunteerism

Second Inland Festival



On 8 June 2024, **39** Smart Axiata employees volunteered their time at the Second Inland Festival, where they helped to clean up villages, plant trees, and run public campaigns to reduce plastic pollution and promote recycling.

During the festival, our partners taught employees about the negative impacts of single-use plastics. In addition, our employees learned about how the residents of Kampong Phluk started their waste separation journey, obtaining valuable insights into what helps and hinders community-driven sustainability initiatives.

Smart Tree Planting

We gathered **130** employees to take part in a mangrove tree planting activity on 24 August 2024 at a coastal area within the Kampot province. The project aligns with Smart Axiata's mission of becoming a net zero company by 2050, demonstrating our commitment to both people and the plant.



Kid-KATHON

To empower our youth and nurture new digital leaders, we volunteered **two** coding experts to mentor **two** teams of **five** high school students each. The students were given hands-on guidance in micro:bit technology and basic coding, gaining essential skills to develop innovative tech solutions to social and environmental problems.



Community Development (Continued)

Uplifting the Quality of Life for Communities

SmartStart Unipreneur Learning Platform (SmartStart ULP) is an innovative program that equips young Cambodians with entrepreneurial skills through a blended, project-based learning approach integrated into university curricula. Accessible via computer or mobile devices, the platform offers interactive content including case studies, instructional videos and collaborative tools for students and lecturers. On 28 May 2024, Smart Axiata, Impact Hub Phnom Penh, and 17 universities signed an MoU to formally incorporate SmartStart ULP into academic programs.

Since launch:

Amount invested in 2024:
101,783.53 USD

Total beneficiaries in 2024:
1,330 students

35
lecturers trained to
deliver entrepreneurship
curriculum

1,553
students from 61 classes
participated

14
pitch events hosted at
universities



The program's highlight was the 2024 National Hackathon in Siem Reap, where top students pitched startup ideas, with five teams emerging as winners. The Overall Excellence Award team earned a regional exposure trip to Jakarta to explore its vibrant startup ecosystem. Additionally, Smart Axiata contributed one business mentor and one User Experience User Interface (UX/UI) designer to support student teams, reinforcing our commitment to youth empowerment and volunteerism.



"SmartStart ULP gave us access to entrepreneurial knowledge and skills that we never thought possible. The program helped us cultivate both technical capabilities and a problem-solving mindset, enabling us to create digital solutions. Competing at the national level in Siem Reap was a once-in-a-lifetime opportunity. Standing on stage to present our tech solution was a moment of pride and inspiration. Our team is now more determined than ever to turn our ideas into reality and make a positive impact on our community" —One SmartStart ULP participant



Community Development (Continued)

Nurturing Future Leaders and Providing Quality Education

Techno Preincubation Program 2024

Smart Axiata supported the Techno Pre-Incubation Program by the Institute of Technology of Cambodia, a national initiative fostering innovation, digital education and entrepreneurship in key growth sectors such as food processing, agriculture, digital technology, energy and manufacturing. The program brings together students from various universities to form diverse teams and develop sustainable startup ideas. Key components include university seminars, Techno Innovation Challenges, a 10-week bootcamp for business development and prototyping and a final pitch.

In 2024:

26

teams participated

10

teams were chosen to join
a 10-week training program

17

teams advanced to the
final pitching round

8

teams were awarded
500 USD
each to support their projects


Basic Education Equivalency Program (BEEP)

BEEP is an inclusive and transformative initiative targeted at learners from underprivileged and marginalized backgrounds. Aiming to uplift these individuals, BEEP serves inmates, disabled individuals, school dropouts, and those who cannot afford to continue their education. Participants can obtain recognized certification, improve their career prospects and pursue higher education and TVET. The program offers these learners the chance to gain knowledge and skills equivalent to a Grade 9 education, bridging educational gaps and paving the way to brighter futures and social re-integration.

33

BEEP centers across
15 provinces and cities, including

- ▶ **1** in a correctional facility
- ▶ **12** in TVET centers



By leveraging digital education,
the program has supported

- ▶ **4** learners with disabilities
- ▶ Over **105** inmates in their
reintegration into society



Community Development (Continued)

Building a Healthier Planet through Collaboration and Advocacy

National Eco-Pagoda with the Ministry of Environment

Smart Axiata was a key supporter of the National Eco-School and Eco-Pagoda Guideline Dissemination 2024 initiative, in partnership with the Ministry of Education, Youth and Sports. The initiative is aimed at enabling a nationwide shift towards environmentally positive behaviors, particularly plastic reduction and cleanliness. The guidelines were released in campaigns themed “Today, I Don’t Use Plastic Bag” and “Clean Cambodia, Khmer can Do”, focused on educating religious leaders, teachers, students and relevant stakeholders about sustainable practices.



Over **45,000** individuals across Cambodia reached

More than **300** participants attended the inaugural event in Siem Reap



Together Actions for SDGs Event

Smart Axiata was a silver sponsor for the Together Actions for SDGs 2024 event in AEON MALL Cambodia. The event was held to raise awareness and inspire concerted efforts to achieve the UN SDGs, especially Goal 17 (Partnerships for the Goals). Key stakeholders such as the United Nations, government entities, local businesses, and educational institutions came together to foster collaboration and sustainable practices across various sectors.



Fostering collaboration and sustainable practices across various sectors,
116,219 individuals were engaged over three days





Emergency and Disaster Response

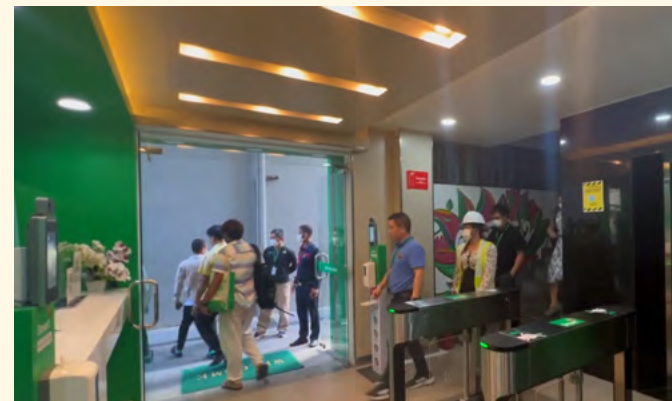
As a telecommunications and digital business, Smart Axiata recognizes it plays a crucial role in providing connectivity and communications necessary or providing support, ensuring information and coordination efforts can be carried out to help communities affected by disasters. We improve disaster responses and community resilience through preparedness, early warnings, and robust infrastructure.

Smart Axiata's operations and processes are aligned with Axiata Group's approach, in that we identify risks, establish early warning systems, form crisis management plans, and hold regular training. We ensure preparedness, minimize disruptions, and enhance resilience by clarifying roles, communication protocols, and recovery strategies.

Disaster Management

Smart Axiata is committed to disaster preparedness and resilience through proactive, responsive, and post-event measures.

- We partnered with People in Need and government agencies to launch Early Warning System (EWS) 1294, a flood early warning system that leverages SMS broadcasting to alert over 8 million users nationwide, covering over 99% of the country and enabling timely evacuations even in remote areas.
- We also have a BCM program aligned with ISO 22301:2012, ensuring uninterrupted telecommunications services during crises through structured response and recovery plans, resource readiness, and simulation exercises.



During a disaster, our crisis management and business recovery teams activate response procedures tailored to the severity and type of event, ensuring continuity of critical operations. Post-disaster, we maintain ongoing network monitoring until full-service restoration and compile a comprehensive report to evaluate our response and identify areas for improvement.

PILLAR 4

Driving Governance & Risk

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At Smart Axiata, we are committed to advancing governance and risk management to enhance business integrity and compliance. By implementing sophisticated practices and procedures, we ensure robust oversight and proactive risk mitigation. This dedication not only fortifies our operational resilience but also reinforces trust with stakeholders and aligns with industry best practices.

Sustainable Development Goals





Digital Integrity

As part of Smart Axiata's commitment to Digital Integrity, we strengthened third-party risk management, cybersecurity safeguards, and data privacy awareness in 2024.

We revisited our list of third parties from 2023 to ensure a broader and more inclusive scope of vendors was covered in our risk assessments, regularly reporting it to the Risk and Compliance Management Committee (RCMC) and the Board Risk and Compliance Committee (BRCC) and escalating any significant risks as necessary.

We also advocated for internet safety by leveraging Smart Axiata's official social media platforms to share online safety, cybersecurity, and data privacy content, targeting a wide range of internet users who face daily exposure to online risks.

Internally, we implemented key controls and raised employee awareness:

Upholding cybersecurity and privacy protection

- Implemented Data Loss Prevention (DLP) protocols, achieving 100% compliance with telco security standards;
- Formalized and implemented the Data Protection Impact Assessment (DPIA) process.



Enhancing employee awareness

- All existing employees completed mandatory training (100% completion), while over 90% of new joiners also successfully completed the required training.
- Circulated monthly updates on cybersecurity and data privacy topics to keep employees informed.



Data Privacy

In 2024, we adopted Axiata Group's data privacy strategy, #ASH3.0: 2024–2026 Roadmap. Guided by the themes of Augment, Integrate, and Automate, we implemented the following initiatives

Augment

- Enforced the use of a standard reporting template to the BRCC.
- Implemented a revamped Privacy Maturity Framework in alignment with the General Data Protection Regulation (GDPR), regional laws, and privacy standards; updated the critical process inventory template.
- Conducted monthly induction training sessions for trainees to ensure early familiarity with data privacy policies and practices.
- Attained 100% employee participation in the annual refresher training.
- Enhanced employee awareness through interactive and engaging monthly newsletters, focusing on practical applications.
- Promoted customer awareness via Smart's Facebook page, supplemented by Corporate Social Responsibility (CSR) initiatives that educate youths across various provinces on the importance of protecting personal data.

Integrate

- Integrated privacy considerations into product development through Privacy by Design (PbD) and DPIAs.
- Embedded vendor due diligence within the procurement procedure.
- Aligned the Data Subject Rights (DSR) procedure with the customer service process for improved response and compliance.
- Fostered cross-functional collaboration to ensure data privacy considerations are integrated across departments.

Automation

- Automated the DPIA process.



Digital Integrity (Continued)

Achieved

Data Privacy Maturity Level of 3.13

based on KPMG assessment (December 2024)

Other Initiatives to strengthen data privacy:

- ▶ **Regular Induction, Training, and Awareness Program**
Ensured 100% employee participation in training to empower employees with the knowledge to identify and respond to potential threats.
- ▶ **Adoption of PbD**
Integrated privacy considerations from the outset and throughout the lifecycle of initiatives involving the collection and handling of personal data.
- ▶ **Implementation of DPIAs**
Conducted DPIAs across all relevant processes to identify and mitigate privacy risks at an early stage.
- ▶ **Vendor Due Diligence and Assessments**
Performed third-party risk assessments to ensure that vendors adhere to strong privacy and security practices, thereby minimizing third party privacy risks across the business.
- ▶ **Incorporation of Privacy and Security Clauses**
Incorporated privacy and security clauses into contracts, the employee CoC and the Supplier CoC.
- ▶ **Assessment of Critical Processes and Digital Platforms**
Reviewed 26 critical processes as well as customer-facing web and mobile applications. In addition, we maintained a personal data repository and developed Critical Process Data Inventories (CDPIs), outlining the lifecycle of personal and sensitive data, including collection, use, transfer, retention, and deletion, along with associated retention schedules and security controls.
- ▶ **Strengthening of Technical Safeguards**
Deployed DLP, Vulnerability Assessment and Penetration Testing (VAPT) and regular system backups. The Information Security (IS) team also implemented access control, patch management, change management and in-motion encryption to protect personal data and prevent unauthorized access, theft, and loss.

Cybersecurity



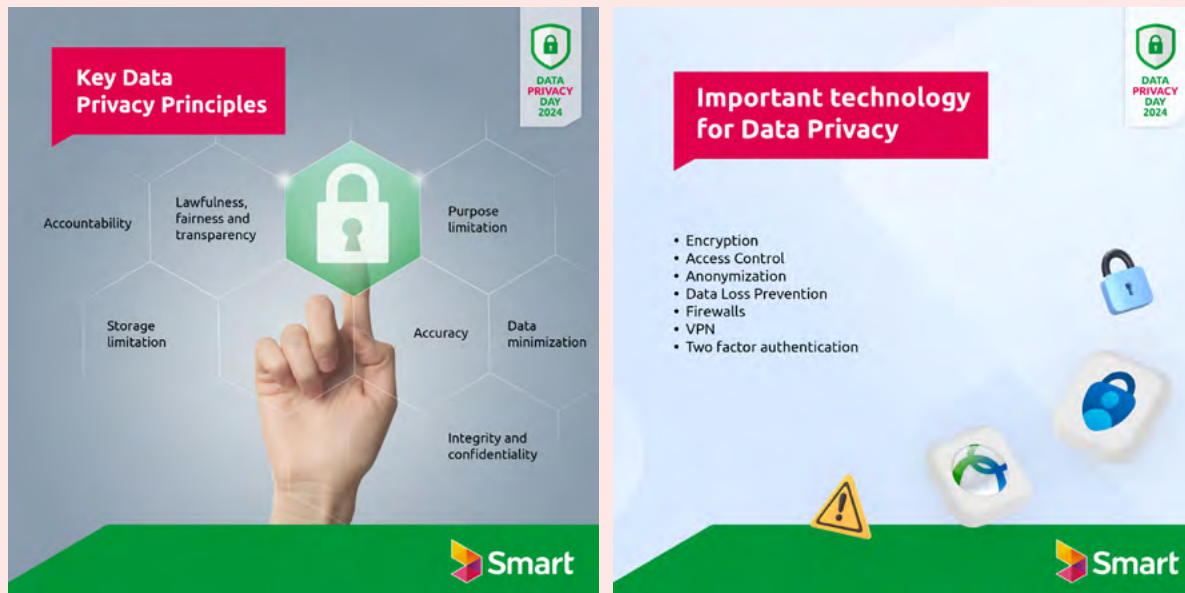
Smart Axiata continues to strengthen its cybersecurity and digital resilience posture under the Digital Trust and Resilience (DT&R) program. Our key progress highlights for the 2024–2026 cycle include:

- ▶ Adopted the National Institute of Standards and Technology (NIST) Cybersecurity Framework (CSF) 2.0, achieving an improved cybersecurity maturity score of 3.25 for FY2024, validated by Axiata Group Cybersecurity.
- ▶ Completed the transition and recertification to ISO/IEC 27001:2022 Information Security Management Systems (ISMS).
- ▶ Improved Zero Trust (ZT) Phase 1 hygiene and initiated the implementation of ZT Phase 2
- ▶ Enhanced endpoint protection by upgrading Endpoint Detection and Response (EDR) tools, expanding GSOC monitoring capacity and strengthening Privileged Access Management (PAM) capacity and functionality.
- ▶ Secured all external-facing web applications with Web Application Firewall (WAF) and conducted regular VAPT to maintain application security.
- ▶ Implemented a Signaling Firewall, addressing all remaining Signaling System 7 (SS7) vulnerabilities and strengthening subscriber protection.
- ▶ Modernized the Security Information and Event Management (SIEM) platform by migrating from LogRhythm to Microsoft Sentinel, improving threat detection and response capabilities.



Digital Integrity (Continued)

Cybersecurity Initiatives and Outcomes



Smart Axiata benefits from Axiata Group's enhanced cybersecurity frameworks, including its successful recertification of the ISO 27001 standards and transition to ISO/IEC 27001:2022. This ensures alignment with global standards and strengthened data protection in Cambodia. To elevate its cyber security maturity and support Axiata Group's cyber security enhancement efforts, Smart Axiata undertook the following measures:

- ▶ Engaged a third-party vendor to support the enhancement and implementation of the ISMS program.
- ▶ Strengthened EDR capabilities alongside the GSOC to improve asset protection, threat detection and incident response.
- ▶ Rolled out a DLP solution to safeguard sensitive information and minimize the risk of data breaches.
- ▶ Implemented Microsoft Baseline Security Standards (MBSS) and Centre for Internet Security (CIS) benchmarks to improve overall system security posture.
- ▶ Upgraded and expanded the PAM solution to its latest version, adding advanced features for better access control.
- ▶ Enhanced the Threat and Vulnerability Management (TVM) process by conducting regular vulnerability assessments, penetration testing, red teaming exercises and phishing simulations.

Customer Data Breaches

During the reporting period, there were **zero substantiated complaints** concerning breaches of customer privacy or loss of data, according to Smart Axiata's incident response team, data privacy email, and various customer service channels.





Business Ethics and Governance

Corporate Framework

We maintain a robust governance structure to uphold strong business ethics and governance practices. Our governance consists of:

Gift, Donation, Sponsorships
Committee (GDSC)

Smart Investment Management
Committee (SIMC)

Risk and Compliance
Management Committee (RCMC)

Board Risk and Compliance
Committee (BRCC)

Board Audit Committee
(BAC)



In 2024, we continued enhancing our business ethics and governance practices through the following:

Establishing a new Disciplinary Committee, ensuring fair and consistent enforcement of the Employee CoC, policies, and procedures.

- This committee is tasked with investigating and adjudicating alleged violations as well as recommending appropriate disciplinary actions, thereby reinforcing compliance maturity and business ethics across the company.

Completed the company-wide Statement of Risk Management and Internal Controls (SORMIC).

- This exercise helped assess the adequacy of existing controls, validate our structured governance framework, and evaluate the effectiveness of our internal controls across all functions.



Business Ethics and Governance (Continued)

Compliance, Ethics, and Integrity

We are committed to enhancing our compliance, ethics, and integrity framework, in line with Axiata Group's Anti-Bribery and Anti-Corruption (ABAC) Plan 2024–2026. In 2024, our Risk and Compliance team defined our strategic priorities for 2024 to 2026, with a key focus on:

Cultivate Robust Governance

Foster Culture of Accountability

Effectiveness of the Initiatives/Process

Integration (Process Efficiency)

Driving Digital Transformation

To mitigate bribery and corruption risks, the following initiatives were implemented in 2024:

Strengthening Governance Instruments and Declarations

- Ensured ABAC-related policies and governance instruments, including the Employee CoC, Branding, Advertising, Marketing, and Sponsorship (BAMS) Policy, and Gifts, Donations, Sponsorship (GDS) Policy, were reviewed and updated.
- Introduced quarterly Conflict of Interest declarations from Q3 2024 onwards.

We achieved **100% completion rate** for the annual **Conflict of Interest** and **CoC** declarations

Communication, Awareness, and Capacity Building

- Successfully rolled out the 2024 Compliance Month and launched the “Let’s Talk Compliance” internal talk show.
- Quarterly compliance communications were sent to external partners.
- Monthly inductions for new joiners included ABAC and CoC awareness.
- Annual mandatory compliance training was conducted for all employees and freelancers.
- Enhancements were made to the Smart official website, particularly the corporate governance section.





Business Ethics and Governance (Continued)

Compliance, Ethics, and Integrity (Continued)

Monitoring, Evaluation, and Digitalization

- ▶ Internal audits and compliance monitoring were carried out on ABAC-related programs.
- ▶ A group-wide integrity survey was launched to assess ethical culture and behaviors.
- ▶ The BAMS checklist was automated to improve process consistency and traceability.

Enterprise-Wide Bribery and Corruption Risk Assessment

A comprehensive assessment was conducted across all 273 internal processes to identify bribery and corruption risks under the new company structure. Mitigation measures include:

- ▶ Regular ABAC training for employees.
- ▶ Due diligence and performance evaluation of vendors and third parties.
- ▶ Ongoing communications on anti-corruption principles to third parties.
- ▶ Enhanced compliance monitoring and evaluation.
- ▶ Operationalization of the GDS Committee overseeing BAMS and CSR-related transactions.
- ▶ Strengthening of the procure-to-pay process with stricter monitoring of goods and service acceptance.
- ▶ Tighter Conflict of Interest procedures.
- ▶ Reinforcement of a “zero tolerance” tone from the top on non-compliance.

273 internal processes of 7 divisions

assessed for bribery and corruption risks under the new company structure.*

* Taken into account a new company structure.

There were
zero confirmed incidents of bribery or corruption
reported through our whistleblowing channels. All whistleblowing cases received were investigated and none were found to involve corruption

Governance, Risk, and Compliance Training

During the reporting period, we conducted the following training modules for our employees, focusing on governance, risk, and compliance:

▶ ABAC	1,331 out of 1,359 eligible personnel, including freelancers (Q4 new joiners)	98%
▶ Whistleblowing	1,172 out of 1,200 employees (excludes freelancers)	98%
▶ Enterprise Risk Management (ERM) & BCM	1,170 out of 1,200 employees	97.5%
▶ Data Privacy Refresher	942 out of 943 eligible employees; one excluded due to prolonged medical leave	99.89%
▶ Cybersecurity	1,171 out of 1,200 employees	98%



Business Ethics and Governance (Continued)

Speaking Up

BRCC

We maintain a confidential whistleblowing channel as part of our commitment to ethical conduct and the protection of human rights. This platform enables employees, stakeholders and members of the public to report suspected misconduct or unethical behavior anonymously. An independent third party oversees the channel to ensure impartiality, and all reports are investigated promptly and thoroughly.

Whistleblowing Awareness and Engagement Initiatives

We also undertook the following initiatives in 2024 to strengthen awareness and accessibility of our whistleblowing framework. Going forward, we plan to conduct a group-wide pulse survey to gather feedback and assess awareness on whistleblowing for 2025.

- ▶ Disseminated a Group CEO message via email in conjunction with Whistleblowing Day.
- ▶ Translated the whistleblowing policy and procedure from English to Khmer to enhance staff understanding.
- ▶ Conducted one mandatory training session for all staff through the central learning platform.
- ▶ Held four online classroom sessions to reinforce awareness and application.
- ▶ Delivered one public sharing during the launch of Smart Axiata's 2023 Sustainability Report.
- ▶ Posted on Yammer to further promote whistleblowing awareness.



Anti-Competitive Behavior

We recognize the importance of customer protection and ensure that we comply with the necessary laws and regulations to emphasize anti-competitive behavior.

- ▶ Adhere to the TRC's tariff framework.
- ▶ Implement the Employee CoC – Outlines clear principles for employees when engaging with competitors, promoting fair and responsible business practices .
- ▶ Incorporated anti-competitive conduct clauses into our Supplier CoC to ensure transparency and legal compliance across our ecosystem.
- ▶ Comply with consumer protection.



Business Ethics and Governance (Continued)

Risk Management

We uphold robust risk management by ensuring our employees are actively involved in managing risks. This is crucial to the effectiveness of Smart Axiata's ERM. In 2024, we:

- Provided training to Smart Axiata's risk champions in each department. This improved our ERM culture, particularly in risk identification and registration.
- Incorporated ESG into our ERM framework.
- Conducted a self-assessment of Smart Axiata's ERM maturity based on the globally recognized Gartner framework.

Human Rights

We prioritize human rights in all our operations and business activities.

There were **zero** substantiated complaints on human rights violations received through the Speak Up channel.

Tax Transparency

Tax Reporting

- We place a high value on transparency and accountability, particularly in relation to our tax obligations.
- We ensure that our tax reports are accurate, timely and fully compliant with local, national and international regulations.
- By maintaining clear communication with relevant tax authorities, we promote trust with our stakeholders and demonstrate our commitment to responsible corporate governance.

Zero outstanding tax liabilities for FY2020-FY2023 with the GDT.

Fulfillment of Tax Obligations

- Our efforts to meet all tax obligations go beyond just legal compliance. We reflect our corporate responsibility to contribute fairly to the communities in which we operate.
- We believe that fulfilling our tax obligations is not only a legal requirement but also a vital part of supporting sustainable development and fostering economic growth.
- Through diligent planning, rigorous reporting and ongoing internal audits, we strive to meet all our tax responsibilities in a timely and efficient manner.
- By ensuring transparency and full tax compliance, we aim to contribute positively to both the economy and society, reinforcing our role as a responsible corporate citizen.

Tax Audit

- As part of our commitment to maintaining transparency and adhering to the highest standards of financial integrity, we have successfully concluded the comprehensive tax audit with the General Department of Taxation (GDT) for the FY2020-FY2023.
- The audit revealed no outstanding tax liabilities, confirming our consistent effort to complying with tax regulations and fulfill our financial obligations.



Smart Axiata

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Political and Regulatory Considerations

Regulatory Alignment and Compliance Strategy

To mitigate risks and leverage opportunities in a dynamic regulatory environment, Axiata Group has established a regulatory framework that is being implemented at the operational companies (OpCos) level, including Smart Axiata. Among the key measures included under this framework are:

Regulatory Affairs as an Internal Consultant

- ▶ The regulatory team provides pre-launch compliance assessments for new products and services.

Quarterly Compliance Reporting

- ▶ Updates on compliance status are reported to Axiata Group, RCMC, BRCC and the Board.
- ▶ Escalation of any regulatory challenges faced by the business.

Regulatory and Legal Conformity Assessments

- ▶ Smart Axiata has initiated Regulatory/Law Conformity Assessments to proactively identify potential compliance gaps and assist management in risk mitigation.

As Cambodia's regulatory landscape evolves, Smart Axiata remains attentive to both the opportunities that arise and the compliance requirements that accompany these changes. Ongoing government reforms are fostering a more business-friendly environment while also introducing areas that require continued adaptation.

Outlined below are the key regulatory changes and Smart Axiata's corresponding responses:

Restrictions on SIM Card Registration for Prepaid Users

- ▶ Individuals using prepaid services are not allowed to register more than five SIM cards under a single identification number.
- ▶ This regulation does not apply to enterprise users or to postpaid M2M or IoT users, who may register SIM cards as needed for business or operational purposes.

Compliance Challenges

- ▶ Non-compliance on SIM registration will be facing with severe monetary fines by the regulator.
- ▶ Consumer need to be aware of the importance of using the valid ID. Consumer need to supply the valid ID at all time of SIM registration.
- ▶ Some dealers haven't respected and complied to the SIM registration regulation.

Our Response

- ▶ Implemented an eKYC system for SIM card registration.
- ▶ Issued official directives to dealers to ensure compliance with regulatory requirements.
- ▶ Conducted mystery shopping exercises to assess and monitor compliance levels across segments.
- ▶ Carried out public awareness campaigns through online platforms, SMS notifications, and direct customer engagement.



Political and Regulatory Considerations (Continued)

Regulatory Alignment and Compliance Strategy (Continued)

Quality of Service Compliance Challenges

- ▶ Securing locations to erect towers in urban area has become a greater challenge as the available locations are limited.
- ▶ There are concerns by the public in some areas about health impact, which leads to refusal of leasing their land space, terminating the contract and or refuse to renew the contract.
- ▶ There are some rural areas facing floods during the raining season.
- ▶ Fiber optic gets cut, and frequency electric outages.
- ▶ Some users are being misled by the seller/distributor to use the illegal repeater in some areas which cause severe interference to the network.

Compliance Challenges

- ▶ The regulation mandates that all telecom operators must meet minimum Key Performance Indicator (KPI) thresholds, which include, but are not limited to:
 - Minimum internet speed requirements
 - Network service coverage standards

Our Response

- ▶ Assessed Quality of Service (QoS) performance on an ongoing basis and expanded network sites.
- ▶ Provided regular progress updates on network roll-out plans to the TRC.
- ▶ Engaged with the MPTC and TRC at the management level to enhance communication and transparency.



Impact Case: Delivering Health Message Nationwide



Messages on drug misuse/abuse prevention and HIV awareness were disseminated nationwide, reaching diverse communities across all regions of Cambodia.

At Smart Axiata, we are dedicated to making a positive and lasting impact on the lives of our community. We believe in leveraging our resources and platforms to promote social well-being and public health. As part of our commitment, we support the TRC in raising awareness on critical health issues, including the prevention of drug abuse and the spread of HIV.

Through our partnership with the TRC, we have actively contributed to the distribution of awareness messages aimed at preventing drug abuse. Our efforts have helped extend these important messages to a wide audience by sending more than 79 million SMS to Cambodian citizens across various regions. This furthers the mission to educate and protect our communities from the harmful effects of substance abuse.

Similarly, we have collaborated with the TRC on campaigns to promote HIV awareness and prevention. These efforts have been integral in sending more than 82 million messages, helping to inform and empower individuals with the knowledge necessary to protect themselves and reduce the spread of Human Immunodeficiency Virus (HIV).

Our continued collaboration with the TRC reflects our ongoing commitment to creating meaningful social change and fostering a safer, healthier future for all.

Geopolitical Risk Monitoring and Mitigation

At Smart Axiata, we actively monitor geopolitical risk as an emerging threat through our enterprise risk radar. While Cambodia’s geopolitical landscape is expected to remain relatively stable in 2024, we continue to take proactive measures to stay ahead of potential disruptions. We focus on key areas and adopt corresponding risk mitigation strategies to safeguard our operations.

▶ Bribery and corruption risks	ABAC Program: We adhere to Axiata Group's ABAC framework to ensure compliance with anti-corruption regulations.
▶ Money laundering threats	Due Diligence in Business Partners: We conduct rigorous vetting and risk assessment of business partners to prevent exposure to financial crimes or reputational risks.
▶ Geopolitical alignments that may lead to sanctions, reduced international aid or changes in tariffs	Continuous Political and Regulatory Monitoring: Our Regulatory Affairs team closely monitors political developments and regulatory changes to anticipate and address potential impacts.





Sustainable Supply Chain

Supplier Engagement and Capacity Building

Smart Axiata engages regularly with its suppliers and implement capacity-building to uphold responsible practices, compliance and integrity. These efforts aim to foster long-term partnerships built on trust, transparency, and shared values.

► Smart Axiata Integrity – Zero Tolerance

We communicate our zero-tolerance approach for all forms of bribery and corruption to all suppliers through our anti-bribery and corruption policies and for them to promptly report any concerns or suspected violations through our strictly confidential whistleblowing channel.

► Smart Axiata Supplier Code of Conduct and Pre-Third-Party Due Diligence Assessment

We require all suppliers to review and sign off on the Smart Axiata supplier CoC to formally acknowledge their compliance. We also mandated the completion of the Pre-Third-Party Due Diligence (Pre-TPDD) assessment to gain visibility into suppliers' operations and activities.

285

suppliers signed off the supplier CoC

265

suppliers completed
the pre-TPDD assessment

► Supplier Engagement

We conduct site visits to the warehouses, production facilities and offices of local suppliers to assess their conditions and ensure compliance with Cambodian labor laws and the supplier CoC. These visits also reinforce Smart's expectations to minimize activities with negative environmental and social impact.

► GDS and SpeakUp Channel

We raise awareness about our GDS policy and the SpeakUp channel by emailing all our suppliers, reinforcing our commitment to integrity and transparency.

► Child Online Protection

We raise supplier awareness of child online protection through an email blast to all suppliers.

Spending on Local Suppliers

Smart Axiata directed **37.54%** of its total USD expenditure to local suppliers.

A

- Action Pour Les Enfants (APLE)
- Annual Cambodia STEM Festival (ACSF)
- Anti-Bribery and Anti-Corruption (ABAC)
- Axiata Digital Labs (ADL)

B

- Basic Education Equivalency Program (BEEP)
- Board Audit Committee (BAC)
- Board Risk and Compliance Committee (BRCC)
- Branding, Advertising, Marketing, and Sponsorship (BAMS)
- Business Continuity Management (BCM)

C

- Cambodia Academy of Digital Technology (CADT)
- Cambodia Coding Festival (CODE-C)
- Cambodia Robotics Olympiad (CRO)
- Centre for Internet Security (CIS)
- Code of Conduct (CoC)
- Corporate Social Responsibility (CSR)
- Critical Process Data Inventories (CDPIs)
- Customer Relationship Management (CRM)
- Cybersecurity Framework (CSF)

D

- Data Loss Prevention (DLP)
- Data Protection Impact Assessment (DPIA)
- Data Subject Rights (DSR)
- Development and Operations (DeVops)
- Digital Trust and Resilience (DT&R)
- Diversity, Equity and Inclusion (DEI)

E

- Early Warning System (EWS)
- Educational Broadcasting Cambodia (EBC)
- Electronic Customer Relationship Management (eCRM)
- Electronic Know Your Customer (eKYC)
- Electronic Subscriber Identity Module (eSIM)
- Embedded SIM (eSIM)
- Employee Engagement Score (EES)
- Endpoint Detection and Response (EDR)
- Enterprise Risk Management (ERM)
- Environmental, Social, and Governance (ESG)

F

- Fiber to the Home (FTTH)

G

- General Data Protection Regulation (GDPR)
- General Department of Taxation (GDT)
- Gifts, Donations, Sponsorship (GDS)
- Global Security Operation Center (GSOC)
- Greenhouse Gas (GHG)
- Gross Domestic Product (GDP)
- Gift, Donation, Sponsorships Committee (GDSC)

H

- Human Immunodeficiency Virus (HIV)

I

- Information and Communications Technology (ICT)
- Information Security (IS)
- Information Security Management Systems (ISMS)
- Intelligent Digital Management Unit (iDMU)
- Interactive Voice Response/Unstructured Supplementary Service Data (IVR/USSD)
- International Energy Agency (IEA)
- Internet of Things (IoT)

K

- Key Performance Indicator (KPI)
- Kilowatt (kW)
- Kilowatt-Hour (kWh)

L

- Lost time incident frequency rates (LTIFR)

M

- Memorandum of Understanding (MoU)
- Microsoft Baseline Security Standards (MBSS)
- Ministry of Post and Telecommunications (MPTC)
- Mobile Device Management (MDM)

N

- National Institute of Standards and Technology (NIST)

O

- Occupational Safety and Health (OSH)
- Operations and maintenance (O&M)

P

- Pre-Third-Party Due Diligence (Pre-TPDD)
- Privacy by Design (PbD)
- Privileged Access Management (PAM)

Q

- Quality of Service (QoS)

R

- Risk and Compliance Management Committee (RCMC)

S

- Science, Technology, Engineering, and Mathematics (STEM)
- Security Information and Event Management (SIEM)
- Shop-in-Shop (SiS)
- Short Messaging System (SMS)
- Signaling System 7 (SS7)
- Smart Axiata Digital Innovation Fund (SADIF)
- Smart Investment Management Committee (SIMC)
- Small and Medium Enterprises (SMEs)
- SmartStart Unipreneur Learning Platform (SmartStart ULP)
- Statement of Risk Management and Internal Controls (SORMIC)
- Subscriber Identity Module (SIM)
- Sustainable Development Goals (SDGs)

T

- Technical and Vocational Education and Training (TVET)
- Telecommunication Regulator of Cambodia (TRC)
- Threat and Vulnerability Management (TVM)
- Tonnes of Carbon Dioxide Equivalent (tCO₂e)

U

- United Nations (UN)
- United Nations Sustainable Development Goals (UN SDGs)
- Universal Service Obligation Fund (USO)
- User Experience/User Interface (UX/UI)

V

- Vulnerability Assessment and Penetration Testing (VAPT)

W

- Web Application Firewall (WAF)

Z

- Zero Trust (ZT)

STATEMENT OF USE	Smart Axiata has reported the information cited in this GRI content index for the period January 1, 2024, to December 31, 2024 with reference to the GRI Standards.
GRI 1 USED	GRI 1: Foundation 2021
APPLICABLE GRI SECTOR STANDARD	Not Applicable

GRI Disclosure	GRI Disclosure Title	Page Number	Remarks/Omissions
GRI 2: GENERAL DISCLOSURES 2021			
The organisation and its reporting practices			
2-1	Organizational details	Pg. 1-2	
2-2	Entities included in the organization's sustainability reporting	Pg. 2	
2-3	Reporting period, frequency and contact point	-	This Annual Sustainability Report covers the period from 1 January to 31 December 2024. For any inquiries or feedback, please email sustainability@axiata.com
2-4	Restatements of information	-	No restatements were made during the reporting period
2-5	External assurance	-	No external assurance was conducted for this report
Activities and workers			
2-6	Activities, value chain and other business relationships	Pg. 1-2	Refer also to Axiata Group Berhad IAR 2024
2-7	Employees	Pg. 31	
2-8	Workers who are not employees	-	Information not available
Governance			
2-9	Governance structure and composition	-	Refer to Axiata Group Berhad IAR 2024
2-10	Nomination and selection of the highest governance body	-	Refer to Axiata Group Berhad IAR 2024
2-11	Chair of the highest governance body	-	Refer to Axiata Group Berhad IAR 2024
2-12	Role of the highest governance body in overseeing the management of impacts	-	Refer to Axiata Group Berhad IAR 2024
2-13	Delegation of responsibility for managing impacts	-	Refer to Axiata Group Berhad IAR 2024

GRI Disclosure	GRI Disclosure Title	Page Number	Remarks/Omissions
2-14	Role of the highest governance in sustainability reporting	-	Refer to Axiata Group Berhad IAR 2024
2-15	Conflicts of interest	-	Refer to Axiata Group Berhad IAR 2024
2-16	Communication of critical concerns	-	Refer to Axiata Group Berhad IAR 2024
2-17	Collective knowledge of the highest governance body	-	Refer to Axiata Group Berhad IAR 2024
2-18	Evaluation of the performance of the highest governance body	-	Refer to Axiata Group Berhad IAR 2024
2-19	Remuneration policies	-	Refer to Axiata Group Berhad IAR 2024
2-20	Process to determine remuneration	-	Refer to Axiata Group Berhad IAR 2024
2-21	Annual total compensation ratio	-	Refer to Axiata Group Berhad IAR 2024
Strategy, policies and practices			
2-22	Statement on sustainable development strategy	Pg. 3-6	
2-23	Policy commitments	-	Refer to Axiata Group Berhad IAR 2024
2-24	Embedding policy commitments	-	Refer to Axiata Group Berhad IAR 2024
2-25	Processes to remediate negative impacts	-	Refer to Axiata Group Berhad IAR 2024
2-26	Mechanisms for seeking advice and raising concerns	Pg. 49	
2-27	Compliance with laws and regulations	-	Zero fines and non-monetary sanctions received in 2024
2-28	Membership associations	-	Refer to Axiata Group Berhad IAR 2024
Stakeholder engagement			
2-29	Approach to stakeholder engagement	-	Refer to Axiata Group Berhad IAR 2024
2-30	Collective bargaining agreements	-	Refer to Axiata Group Berhad IAR 2024
GRI 3: MATERIAL TOPICS 2021			
3-1	Process to determine material topics	-	Refer to Axiata Group Berhad IAR 2024
3-2	List of material topics	-	Refer to Axiata Group Berhad IAR 2024

STANDARD DISCLOSURES

ADVANCING DIGITAL SOCIETY

GRI Disclosure	GRI Disclosure Title	Page Number/Remarks
Focus Area: Network Quality and Connectivity		
GRI 3: MATERIAL TOPICS 2021		
3-3	Management approach	Pg. 8
GRI 203: INDIRECT ECONOMIC IMPACTS 2016		
203-1	Infrastructure investments and services supported	Pg. 9
203-2	Significant indirect economic impacts	Pg. 9
Focus Area: Customer Experience		
GRI 3: MATERIAL TOPICS 2021		
3-3	Management approach	Pg. 10
GRI 203: INDIRECT ECONOMIC IMPACTS 2016		
203-1	Infrastructure investments and services supported	Pg. 10-11
203-2	Significant indirect economic impacts	Pg. 10-11
Focus Area: Digital Inclusion		
GRI 3: MATERIAL TOPICS 2021		
3-3	Management approach	Pg. 12
GRI 203: INDIRECT ECONOMIC IMPACTS 2016		
203-1	Infrastructure investments and services supported	Pg. 12-20
203-2	Significant indirect economic impacts	Pg. 12-20

GRI Disclosure	GRI Disclosure Title	Page Number/Remarks
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GRI 3: MATERIAL TOPICS 2021		
3-3	Management approach	Pg. 21
GRI 203: INDIRECT ECONOMIC IMPACTS 2016		
203-1	Infrastructure investments and services supported	Pg. 21

ADVANCING GREEN ECONOMY

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3-3	Management approach	Pg. 23
GRI 305: EMISSIONS 2016		
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305-2	Energy indirect (Scope 2) GHG emissions	Pg. 23
305-3	Other indirect (Scope 3) GHG emissions	Pg. 23
Focus Area: Climate Change		
GRI 3: MATERIAL TOPICS 2021		
3-3	Management approach	Pg. 26
GRI 303: WATER AND EFFLUENTS 2018		
303-5	Water consumption	Pg. 26

ADVANCING PEOPLE AND COMMUNITIES

GRI Disclosure	GRI Disclosure Title	Page Number/Remarks
Focus Area: Fair, Diverse, and Inclusive Employment		
GRI 3: MATERIAL TOPICS 2021		
3-3	Management approach	Pg. 30-32
GRI 405: DIVERSITY AND EQUAL OPPORTUNITY 2016		
405-1	Diversity of governance bodies and employees	Pg. 31/Refer to Axiata Group Berhad IAR 2023 for diversity of governance bodies
GRI 401: EMPLOYMENT 2016		
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	-/ Refer to Axiata Group Berhad IAR 2024
Focus Area: Talent Development and Attraction		
GRI 3: MATERIAL TOPICS 2021		
3-3	Management approach	Pg. 33-35
GRI 404: TRAINING AND EDUCATION 2016		
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	-/ Refer to Axiata Group Berhad IAR 2024
404-1	Average hours of training per year per employee	Pg. 34
404-2	Programmes for upgrading employee skills and transition assistance programmes	Pg. 34
Focus Area: Employee Health, Safety and Well-Being		
GRI 3: MATERIAL TOPICS 2021		
3-3	Management approach	Pg. 36
GRI 403: OCCUPATIONAL HEALTH AND SAFETY 2018		
403-9	Work-related injuries	Pg. 36
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GRI 3: MATERIAL TOPICS 2021		
3-3	Management approach	Pg. 37-40
GRI 413: LOCAL COMMUNITIES 2016		
413-1	Operations with local community engagement, impact assessments, and development programs	Pg. 37-40
413-2	Operations with significant actual and potential negative impacts on local communities	Pg. 37-40
Focus Area: Emergency and Disaster Response		
GRI 3: MATERIAL TOPICS 2021		
3-3	Management approach	Pg. 41

DRIVING GOVERNANCE AND RISK

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GRI 3: MATERIAL TOPICS 2021		
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GRI 418: CUSTOMER PRIVACY 2016		
205-1	Operations assessed for risks related to corruption	Pg. 48
205-2	Communication and training about anti-corruption policies and procedures	Pg. 48
205-3	Confirmed incidents of corruption and action taken	Pg. 48
GRI 406: NON-DISCRIMINATION 2016		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Pg. 45

GRI Disclosure	GRI Disclosure Title	Page Number/Remarks
Focus Area: Business Ethics and Governance		
GRI 3: MATERIAL TOPICS 2021		
3-3	Management approach	Pg. 46
GRI 205: ANTI-CORRUPTION 2016		
205-1	Operations assessed for risks related to corruption	Pg. 53
205-2	Communication and training about anti-corruption policies and procedures	Pg. 48, 54
205-3	Confirmed incidents of corruption and action taken	Pg. 48
Focus Area: Political and Regulatory Considerations		
GRI 3: MATERIAL TOPICS 2021		
3-3	Management approach	Pg. 51-52
Focus Area: Sustainable Supply Chain		
GRI 3: MATERIAL TOPICS 2021		
3-3	Management approach	Pg. 54
GRI 204: PROCUREMENT PRACTICES 2016		
204-1	Proportion of spending on local suppliers	Pg. 54



**No. 464A Monivong Blvd., Sangkat Tonle Bassac,
Khan Chamkarmorn, Phnom Penh, Cambodia.**

Tel : +855 10 200 888

Email : info@smart.com.kh

sustainability@smart.com.kh