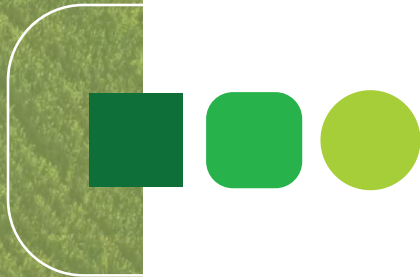




# Sustainable & Equitable Access For All



**SUSTAINABILITY REPORT  
UPDATE 2022**

# Inside This Report

<b>Message from Our CEO</b>	02	<b>Recognition of Our Efforts</b>	
Group wide ESG Highlights	03	EDOTCO List of Awards	18
EDOTCO's Sustainability Strategy and Approach	04	<b>Country Highlights</b>	
EDOTCO's Ambition and Carbon Neutral	06	Malaysia	19
Our Board of Directors	08	Bangladesh	21
Senior Leaders at Headquarters and Countries	10	Pakistan	22
		Philippines	23
<b>Risk Management</b>		Sri Lanka	24
Risk Management Processes and Integration	12	Myanmar	25
Enterprise Risk Management	12	Cambodia	26
Line of Defence	14	<b>Glossary</b>	27
Business Continuity Management	14		
EDOTCO Group's BCM Recovery			
Organisation Structure	15		
Corporate Policy	16		
Climate Change Adaptation	17		

## Message from Our CEO



As EDOTCO commemorates its 10th anniversary, we are proud to have established a significant presence in nine countries across South and Southeast Asia. Today, we stand as the sixth largest global telecommunications TowerCo, committed to bridging the digital divide in the region.

Our recent successful acquisition of telecommunication towers in the Philippines and Indonesia marks a significant milestone in our growth story. With over 58,000 towers in our regional portfolio, we are closer to achieving our mission of providing reliable and accessible digital connectivity to all.

We launched our inaugural Sustainability Blueprint, reinforcing our commitment to ESG and sustainable connectivity across Malaysia and Asia. Our renewed brand purpose of 'Shaping Future Connectivity' and refreshed brand pillars of Connecting the Unconnected, Next Generation Infrastructure, Sustainable and Responsible Solutions and Bionic Organisation culture, will guide us as we strive towards realising a 5G future and accelerating equitable access to digital connectivity across the region.

As part of our sustainability journey, we recognize the importance of conducting regular materiality assessments to identify and prioritize key environmental, social, and governance (ESG) issues. To ensure our efforts are aligned with the evolving needs of our stakeholders, we conduct these assessments once every 2 years. By engaging with our diverse range of stakeholders, including employees, customers, communities, and industry experts, we gain valuable insights into the issues that matter most to them. This proactive approach allows us to address the most pressing sustainability challenges and align our strategic priorities accordingly.

We have set a definitive target with regards to GHG Emission in 2023 and plan to set more targets in 2024 including tracking these targets closely. I am please to confirm that EDOTCO Group continues to reaffirms our support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment, and Anti-Corruption.

Overall, 2022 has been a year of growth for the EDOTCO Group and we look forward to continuing our efforts to shape a sustainable and connected future for all

Sincerely,

**Mohamed Adlan Ahmad Tajudin**  
Chief Executive Officer  
EDOTCO Group

# Group wide ESG Highlights:



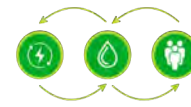
## Environmental

- Developed Environmental Policy Statement, approved by the Board in February 2022, outlining principles for responsible and sustainable business activities
- Sustainable waste management guided by the Green Framework and Supplier Code of Conduct to minimise solid waste generation through source reduction, reuse and recycling to avoid landfill dumping; collected and recycled 489.1 tonnes of e-waste and 761.0 kg of recyclable items
- Obtaining Green Building Index (GBI) certification for Laman EDOTCO that indirectly reduces Scope 1 & Scope 2 emissions of EDOTCO Group
- Scope 1 and 2 GHG emission part of Axiata Group's verification audit
- Kicked off scope 3 GHG emission calculation
- 2R initiative – regional oil recycling programme and trees planting initiative to support Malaysian Government 100m trees programme.



## Social Labour

- Launched a Virtual Reality TowerCo101 training for employees, providing a virtual experience of tower operations, especially useful for field employees working at heights of 60 metres and above
- Introduced EDOTCO Listen Programme via a digital tool (Incognito) to enable employees to provide feedback anonymously
- Practices a non discriminatory recruitment and remuneration policy, promoting gender equality, with a female-to-male ratio of 0.97 to 1.0
- All major subsidiaries have ISO45001 and secured OHS National Award for Malaysia Telecommunication Industry
- Maintained ISO Occupational Health & Safety (OH&S) management system
- Obtained National Award for Occupational Safety and Health 2020 and 2021 (received in 2022)
- Kicked off inaugural regional safety pilot programme in Sarawak.
- Operationalization of all labour related policies to aligned to labour rights within UNGC principles.
- Diversity, Equality and Inclusivity (DEI) programme including retreat to improve regional collaboration based on All Black Championship principles.



## Social Community

- Implemented initiatives to improve sustainable development through three strategic programmes: Tower2Power, Tower2Water and Tower2Community, which provide electricity, clean water and disaster relief
- Additional 10,000 number of lives from our Tower2Power, Tower2Water and Tower2Community programme.
- Formation and launched of EDOTCO Ranger volunteerism programme



## Governance

- Completed all initiatives under the Integrity and Anti-Corruption Plan (IACP), obtained the ISO37001 Anti-bribery Management System certification and introduced new initiatives to strengthen our data privacy and cyber security management
- Completion of Integrity and Anti-Corruption Plan 1.
- Integrity and anti-corruption pledge
- Obtained ISO 22301, security and resilience – Business continuity management systems
- 3 Certified Information Privacy Manager in-house
- Defined rating of National Institute of Standards and Technology (NIST) for cyber security practices
- Head of Cyber awarded Top 10 CSO30 ASEAN 2022
- Top 6 ESG Officer of the year by Women in Governance, Risk and Compliance

## EDOTCO'S Sustainability Strategy and Approach

EDOTCO strategic focus and commitment on sustainability ensures its sustainable growth

### Environment

#### Key Focus Areas



#### Milestone achieved...

- **GHG Reduction**
  - Scope 1 & 2: Carbon Neutral 2030 with 45% reduction
  - Scope 3: Target setting
- **Reforestation - planted >40,000 trees**
  - Across all countries we operate in
- **Recycling site waste**
  - 908.8 tons of e-waste from tower sites, 2,000kg of used oil collected in 2022
  - 85% Green Office implemented, recycled ~0.55 tons of items across 7 countries
- **Tower Build**
  - 1,811 vs 1,622 (2022 vs 2021) renewable sites
  - 120 vs 112 (2022 vs 2021) solar powered AC
- **EDOTCO Environmental Policy**
  - Currently practiced across all National Tower Companies

### Social

#### Key Focus Areas



#### Milestone achieved...

- **T2P, T2W, T2C and Zakat**
  - Benefited > 100,000 people
  - Solarised more than 100 homes, installed 4 communal solar units, illuminated 10 streetlights, provided 2 water filter units, equipped 2 homes with power backup refrigerators, and established solar-powered systems in 2 schools
  - Adopt community programs in Kedah & Pahang
- **Endangered Birds Pledge**
  - Partnership with Malaysia Nature Society (MNS) to protect endangered birds nesting in telco towers
- **Diversity, Equality and Inclusivity (DEI)**
  - DEI committee in place
  - Regional DEI Run: Over the 25 days of the competition with 270 athletes registered, collectively run a total of 38,323 km in distance – more than twice the distance from Malaysia to New York.
- **Minimum Age & Wage**
  - Complied with local laws requirements
- **Training and Education**
  - Min 40 hours per employees at all working levels

### Governance

#### Key Focus Areas



#### Milestone achieved...

- **Anti-Corruption**
  - Integrity & Anti-Corruption Plan 2 & ABMS ISO 37001
- **Occupational Health & Safety**
  - ISO 45001 in key markets & Safety talks in schools
- **Risk Management**
  - ISO 22301 Business Continuity Management
- **Board Composition**
  - Balance and diverse representation
- **Data Security**
  - Alignment to Cybersecurity Framework, NIST

# EDOTCO Ambition to Carbon Neutral 2030

Sustainably connect the world to build an equitable and low-carbon economy



2022

Launch of 1st EDOTCO Inaugural Sustainability Report

2023

## Green Target for Approval Scope 1 & 2

Carbon emission database

Alignment

PAS 2060

2024

SBTi by axiata for Scope 1 & Scope 2

Carbon neutral by 2030 with absolute 45% reduction by 2030

Alignment to SBTi principles

2028

## Green Targets (Scope 3)

Assess customers and supplier readiness / commitment towards SBTi

Alignment

PAS 2060  
SBTi by axiata for Scope 1 & Scope 2  
Alignment to SBTi principles

## Scope 3

Remaining balance of 55% via Offset

PAS 2060

2030

## Our Board of Directors

EDOTCO's Board of Directors is committed to our Sustainability journey



**Dato Dr. Nik Ramlah Nik Mahmood**  
Independent Non-Executive Director

Chairman, Board of Directors

Chairman, Board Nomination and Remuneration Committee



**Abraham Verghese TV Abraham**  
Independent Non-Executive Director

Chairman, Board Audit Committee and Related Party Transaction Committee

Chairman, Board Audit Committee and Related Party Transaction Committee



**Datuk Nik Amlizan Mohamed**  
Independent Non-Executive Director (Nominee of KWAP)



**Roslina Abdul Rahman**  
Independent Non-Executive Director

Note:  
As at June 2023

## Our Board of Directors



**Dr. Hans Wijayasuriya**  
Non-Independent Non-Executive  
Director (Nominee of Axiata Group  
Berhad)



**Osamu Itabashi**  
Non-Independent Non-Executive  
Director (Nominee of INCJ, Ltd.)  
  
Member, Board Audit Committee  
and Related Party Transaction  
Committee



**Kenneth Shen**  
Non-Independent Non-Executive  
Director (Nominee of Khazanah  
Nasional Berhad)  
  
Chairman, Board Risk and  
Compliance Committee



**Asuka Sato**  
Non-Independent Non-Executive  
Director (Nominee of Investors)



**Lila Azmin Abdullah**  
Non-Independent Non-Executive  
Director (Nominee of Axiata Group  
Berhad)



**Mohamed Adlan Ahmad  
Tajudin**  
Member, Board Risk and  
Compliance Committee

## Senior Leaders at Headquarters and Countries

### Executive Leadership



**Mohamed Adlan Ahmad Tajudin**  
Chief Executive Officer



**Annis Sheikh Mohamed**  
Chief Financial Officer



**Ramon Chelvarajasingam**  
Chief People Officer



**Gayan Koralage**  
Director, Strategy



**Kevin Chong**  
Director, Group Digital and Analytics



**Megat Mohd. Zukarlai Meor Zailan**  
Director, Group Commercial Management



**Azizee Abdul Aziz**  
Director, Engineering & Operations, EDOTCO Indonesia



**Nik Kamarul Sharifudin**  
Director, Malaysia Operations & Rollout

### Country



**Abdul Aziz**  
Pakistan



**Gayan Koralage**  
Sri Lanka



**Kieran Rabbitt**  
Cambodia



## Senior Leaders at Headquarters and Countries



**Pradeep De Almeida**  
Director, Group Engineering  
Technology and Innovation (ETI)



**Anthony Kersauson**  
Director, Group Mergers and  
Acquisitions



**Shireen Tan**  
Director, Global Shared Services



**Azzahraa Annuar**  
Director, Group Governance, Risk  
and Compliance



**Azrin Tajuddin**  
Head, Company Secretarial



**Nizam Abdullah**  
Head, Internal Audit



**Noreen Sabrina Mohd. Noor**  
Head, Group Corporate  
Communications & Branding



**Azleen Waris**  
Group Financial Controller



**Lim Wee Queen**  
Head,  
Group Project Management



**Rajaduray Selvaduray  
(Acting)**  
Myanmar



**Sunil Issac**  
Bangladesh



**Suraj Narayanan Kutty**  
Philippines

# Risk Management

Section aligned to TCFD requirement

## Risk Management Processes and integration with overall risk management

We recognise that countries we operate in are prone to natural disasters. Each country requires a tailored approach, depending the kind of climate risks they face. We also understood that one-off management of risks is not sustainable. Our Board of Directors has approved our Enterprise Risk Management Policy Framework (“ERMPF”) that guides us on climate risk management from the top down.

We recognize that while climate-related risks and opportunities are inherently linked, each requires a tailored management approach (e.g., our approach for managing physical resilience will differ from that used to manage transition risk created by a carbon policy). We also know that one-off management of risks is not enough. We have established several enterprise-wide processes that help us review and manage risks from the top down. See the Strategy section for more about our approaches to managing specific risks and opportunities.

## Enterprise Risk Management

The framework for managing risk shall assist EDOTCO Group in integrating risk management into significant activities and functions. The effectiveness of risk management depends on the integration into the governance of EDOTCO Group, including decision-making.

The framework encompasses six (6) components, which is in line with globally accepted risk management standards of the ISO 31000:2018 Risk Management - Guidelines, as depicted in the diagram below:



No.	Framework Component	Descriptions
1	<b>Leadership &amp; commitment</b>	The Senior Management demonstrates leadership as well as ongoing commitment in risk management and is responsible to: <ul style="list-style-type: none"> <li>· Customize and implement all components of framework;</li> <li>· Issue policy statement that establishes risk management plan, approach or course of action;</li> <li>· Ensure that necessary resources are allocated in managing risk; and</li> <li>· Assign authority, responsibility and accountability at appropriate levels within the organisation.</li> </ul>
2.	<b>Integration</b>	<ul style="list-style-type: none"> <li>· Integrating risk management into the Group as a dynamic and iterative process, customised according to the Group's need and culture.</li> <li>· Risk management is embedded in every process with adequate control(s) to mitigate the risk; and</li> <li>· Establish governance structure from management structure to determine risk management strategy, direction, accountability, escalation and oversight roles.</li> </ul>
3.	<b>Design</b>	The Risk Management Framework is designed based on: <ul style="list-style-type: none"> <li>· Understanding of the Group's external and internal context;</li> <li>· Commitment from Senior Management through demonstrating and articulating their support to risk management by formulating a risk management policy;</li> <li>· Authorities, responsibilities and accountabilities for relevant risk management roles are assigned and communicated at all levels;</li> <li>· Allocation of appropriate resources for risk management; and</li> <li>· Establishment of effective communication mechanisms and consultation to support effective risk management implementation.</li> </ul>
4.	<b>Implementation</b>	The Risk Management is implemented through: <ul style="list-style-type: none"> <li>· Developing an appropriate plan which outline the implementation time and resources required;</li> <li>· Ensuring that the arrangement for managing risks are clearly understood and practised;</li> <li>· Periodic risk review or engagement and risk awareness program; and</li> <li>· Implementing risk-based thinking in management activities, decision making and business processes.</li> </ul>
5.	<b>Evaluation</b>	<ul style="list-style-type: none"> <li>· Periodic review and evaluation of the Risk Management Framework is carried out to determine its effectiveness and any changes required; and</li> <li>· Any gaps identified will need to be documented and remediated.</li> </ul>
6.	<b>Improvement</b>	<ul style="list-style-type: none"> <li>· Continuously monitor the Risk Management Framework to adapt and address any external or internal changes; and</li> <li>· Continuous enhancement of the Risk Management Framework to improve the suitability, adequacy and effectiveness of risk management process.</li> </ul>

# Risk Management

Section aligned to TCFD requirement

## Line of Defence

The Three Lines of Defense model reflects the Group’s risk management and control processes. In the model, management control is the first line of defense in risk management, the various risk control and compliance oversight functions established by management are the second line of defense, and independent assurance is the third. Each of these three “lines” plays a distinct role within the Group’s wider governance framework.

Line of Defence	Function	Descriptions
1st Line of defence	Business operations	Risk owners at business units are responsible to inculcate risk-based thinking culture in the day-to-day operations and implement effective operational excellence by embedding inherent risks into its quality management system and manage the emerging risks that could hinder from achieving business objectives.
2nd Line of defence	Risk oversight	The Group Risk Management’s responsibility is to establish, and implement the ERM Policy & Framework, facilitate the risk management process and escalate significant risks to BOD.
3rd Line of defence	Audit oversight	The internal audit is responsible to perform independent assurance over the effectiveness of control.

## Business Continuity Management

We maintain the International Organization for Standardisation (ISO) 23001 at Group and Malaysia, with the same standards being applied throughout our footprint. The Group’s Business Continuity Management (BCM) Programme is implemented in a coordinated and consistent manner. This framework was developed in reference to the following international BCM standards & guidelines:

- **ISO 22301 Societal Security – Business continuity management systems – Requirements**
- **ISO 22313 Societal Security – Business continuity management systems – Guidance**

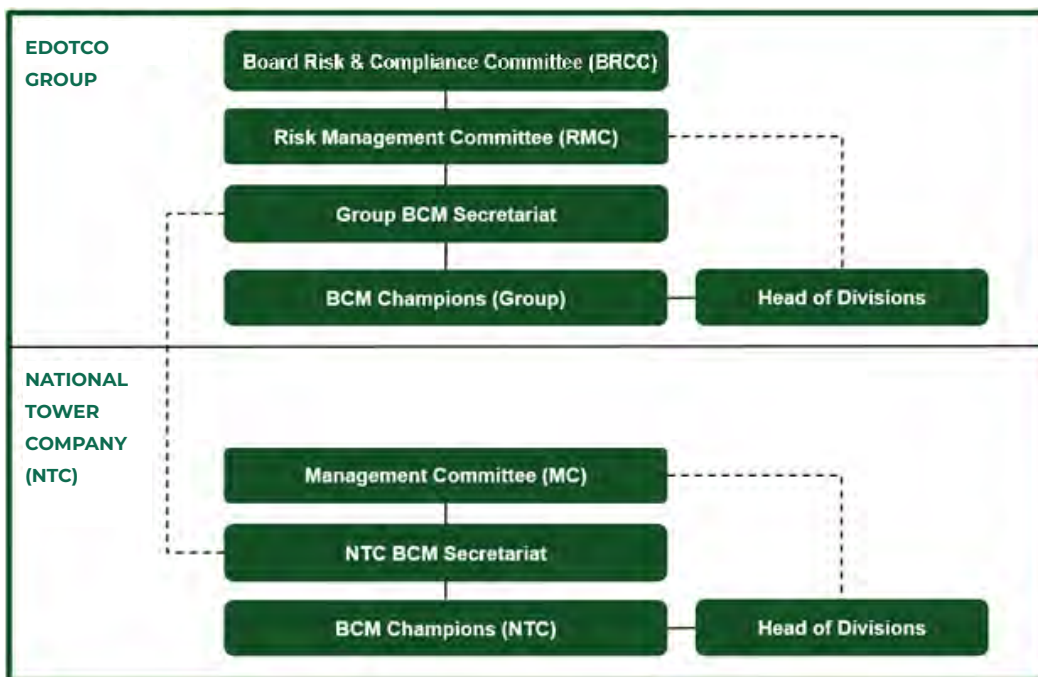
The implementation of EDOTCO Group’s BCM Programme will ensure that edotco Group responds effectively and efficiently to business disruptions by resuming critical operations within the required timeframes and minimise the impact on edotco Group’s overall business operations due to a major crisis or disaster – including climate related.

We are guided by our BCM Policy statement as follows:

***“Through our Business Continuity Management Programme, we are committed to maintain and ensure the continuity of our operation in order to minimise the impact on our stakeholders and customers in the event of a disruption”.***

**EDOTCO Group’s BCM Recovery Organisation Structure is as follows:**

The Three Lines of Defense model reflects the Group’s risk management and control processes. In the model, management control is the first line of defense in risk management, the various risk control and compliance oversight functions established by management are the second line of defense, and independent assurance is the third. Each of these three “lines” plays a distinct role within the Group’s wider governance framework.



As we work to enhance our Business Impact Assessment (“BIA”), we have started analysing climate related impacts in a more structural manner in the annual BIA exercise. Similarly, we have incorporated climate related scenarios in our annual Crisis Simulation and Desktop Walkthrough exercises. We acknowledge that there is more improvements required on the effectiveness of our BCM programs and our BCM team continues to work closely with business unit to ensure climate related risks are adequately addressed.

# Risk Management

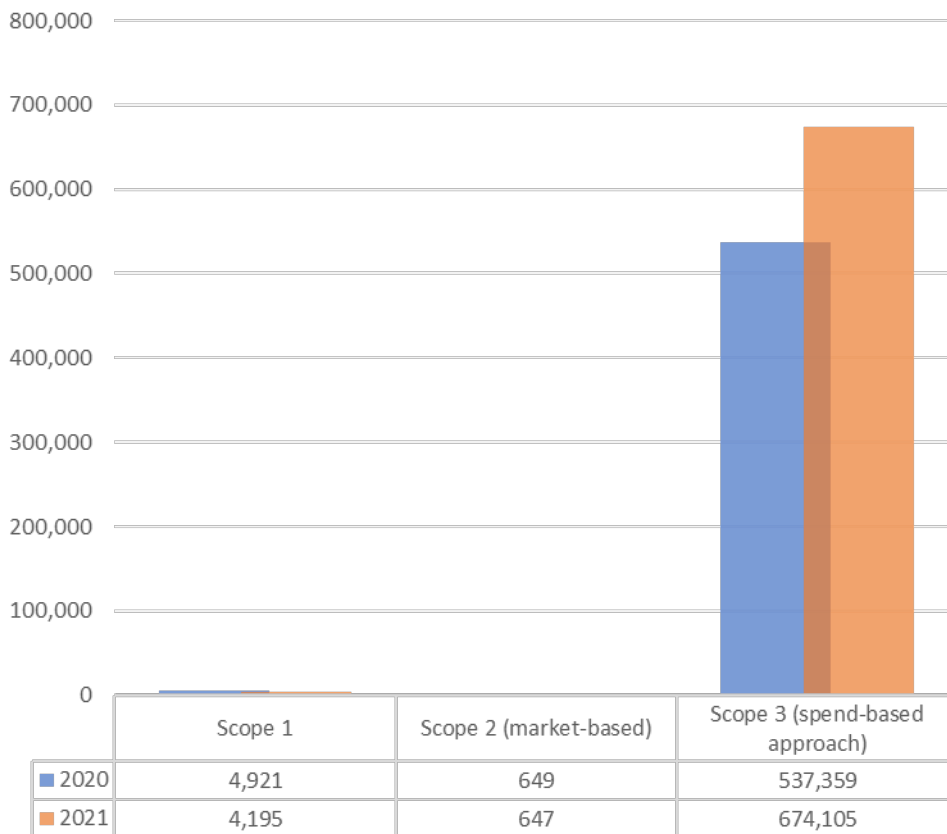
Section aligned to TCFD requirement

## Corporate Policy

All our strategic corporate policy is approved by our Board. On annual basis, as a subsidiary of Axiata Group, even though we are not a listed entity, we also perform a review of Statement on Risk Management and Internal Control in accordance with Paragraph 15.26(b) of the Main Market Listing Requirements of Bursa Malaysia Securities Berhad and guided by the SORMIC – Guidelines for Directors of Listed Issuers.

We continuously calculate our GHG Emission and have set relevant baseline towards our Carbon Neutral journey by 2030.

EDOTCO Group Total Emissions (tCO<sub>2</sub>e)  
2020-2021

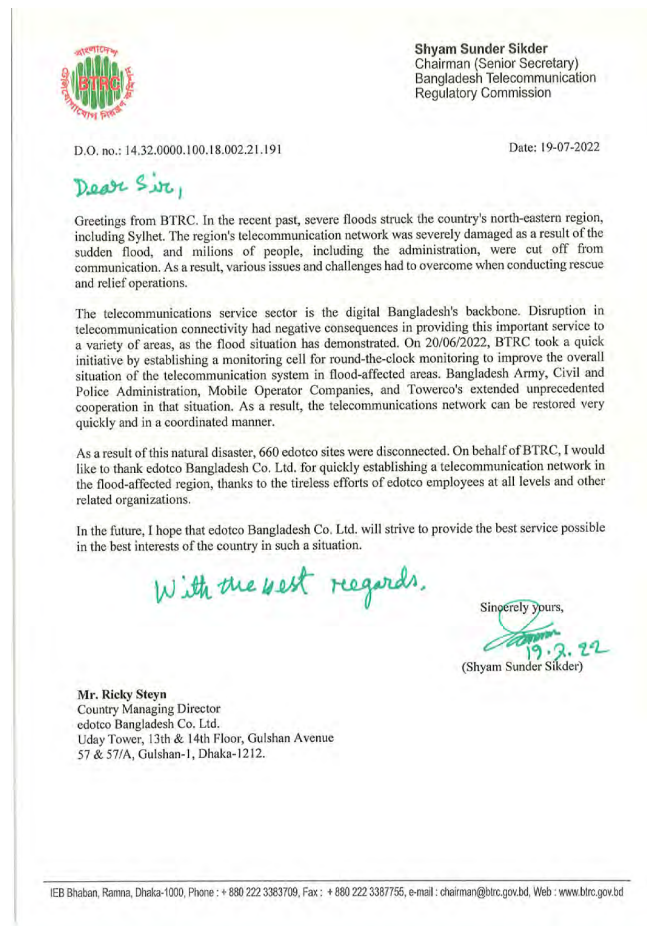


## Climate Change Adaptation

When we plan the construction of new sites or new merger & acquisition activity/transactions, we evaluate the risk of extreme weather conditions as well as risks of typhoon and floods that can be caused by climate change, and reflect the learnings from existing design of current sites.

For our towers in Bangladesh and Malaysia, we analyzed flood risks caused by heavy rainfalls during the flood tides and reflected the results in the site design. For legacy sites which are located in flood prone areas, we ensure adequate business continuity management is in place during the crisis.

We are honoured to receive the recognition from Bangladesh Telecommunication Regulatory Commission for our efforts in Bangladesh during their flood crisis



Recognition letter from Bangladesh Telecommunication Regulatory Commission for flood crisis management

## Recognition of Our Efforts

We are encouraged by the recognitions received for our sustainability journey



### EDOTCO wins 2 awards at the UN Global Compact Network Malaysia & Brunei (UNGCMYB)

- Sustainability Awareness & Employee Engagement Recognition
- Partnership for the Goals Recognition

### EDOTCO secured the National Operational Health and Safety (OHS) Award 2020 & 2021



### Malaysia Technology Excellence Awards 2022- Infrastructure Technology - Telecommunications



### International Finance Awards 2022

Most Sustainable Green Solution Initiatives – Telecom – Malaysia 2022.



## Recognition of Our Efforts



### Employee Experience Awards 2022 by Human Resource

- **Gold**, Best Executive Coaching Programme
- **Gold**, Best Holistic Leadership Development Strategy
- **Gold**, Best HR Digital Transformation Strategy
- **Overall Employee Experience Champion of the Year**
- Overall Engagement Awards
- Overall Leadership Awards
- Silver, Best Cross Functional Leadership Development
- Silver, Best Career Development Programme
- Silver, Best Learning and Development Programme
- Silver, Best Use of Recruitment Technology Tools
- Bronze, Best Soft Skills Training Programme



### EDOTCO Secured Sustainability & CSR Malaysia

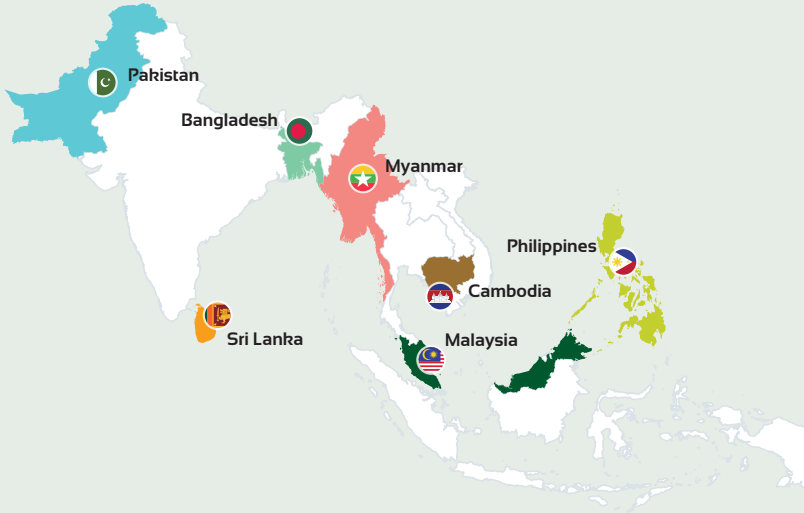
- Company of the year awards for Environment & CSR efforts



### Marketer of the Year in Sustainable Brand Marketing at the Malaysian CMO Award 2022.

# Country Highlights

## COUNTRY: MALAYSIA



### AT A GLANCE

- 21,460 towers owned and managed
- >13,500 lives impacted in the community
- >11,900 trees planted
- 585 employees

### Malaysia's Sustainability Highlights

#### Environment

- Sequestered carbon through tree planting efforts in Malaysia, to date have planted more than 11,900 trees
- Partnership with Malaysia Nature Society (MNS) to protect endangered birds nesting in telco towers

#### Social Labour

- Institutionalised gender diversity and inclusion into policies, practices and standards
- Institution of fair employment and welfare - gender inclusivity: 31 Female:69 Male ratio employment

#### Social Community

- Tower2Community (T2C): more than 13,500 lives impacted to date
- Employee Volunteerism: more than 50% participation

#### Governance

- Employee Health, Safety and Wellbeing
- Certified with ISO 45001 Certification (OHS Management System) in 2020 and maintained standards in 2022
- Certified ISO 37001 Anti-bribery Management System Certification
- Conducted an outreach volunteerism program about Health & Safety Awareness program in schools

### Sustainability Challenges

On our Sustainability journey in Malaysia, we faced the following challenges:

- **Limited land areas for solarisation:** As our new build site cost and design are optimised, the land area required for solar panel installations can be reduced. However, with higher power requirements, land requirement for solar installations will increase
- **Reliable partners for green technology:** Unavailability of rental model partners for green technology is a barrier to the replacement of rental generators at sites

### Forward-Looking Statements

#### Tower2Community

- Rebuilt 11 Orang Asli homes that were swept away by floods.
- Provision of disaster relief aids for flood victims.

#### Tower2Power and Tower2Water

- Provision of electricity and water to orang asli communities in Pahang
- Adoption of Orang Asli villages in Pahang to implement Tower2Power & Tower2Water
- Wakalah Zakat for 37 people
- B40 Asnaf (extreme poor) Entrepreneur Programme (NGO, ABIM) (Benefitting 27 people)
- Motorcycles for B40 Asnaf (extreme poor) to support generation of increased income via Food Panda/Grab Delivery services (Benefitting 10 people)

#### Green Branding

- Implement initiatives in to reduce GHG Scope 1 & 2 emissions
- Collaborate with customers and suppliers to improve GHG Scope 3 emissions

## Country Highlights

### EDOTCO Rangers | Empathy in Motion

EDOTCO, a leading telecommunications infrastructure services company, takes pride in its commitment to corporate social responsibility (CSR). In line with this dedication, EDOTCO has launched the EDOTCO Rangers program, an exciting voluntary initiative that empowers employees to make a difference in their communities. By leveraging their skills, passion, and time, EDOTCO Rangers play an active role in driving positive change and contributing to the betterment of society.

EDOTCO Rangers provides a wide range of engaging volunteer opportunities for employees to choose from. Whether it's environmental conservation projects, educational initiatives, or community development programs. Through these opportunities, employees can contribute their expertise and energy to causes they are passionate about.

The EDOTCO Rangers program not only benefits the communities it serves but also offers personal and professional growth opportunities for participating employees. By engaging in volunteer activities, employees develop essential skills such as leadership, teamwork, communication, and problem-solving. Furthermore, the program fosters a sense of camaraderie and collaboration among employees, as they work together towards a common goal of making a positive impact on society.



#### Jalanan Kasih Murni with axiata

In collaboration with Saora Industries, this initiative provided 617 Orang Asli beneficiaries across four villages in Bentong, Pahang with solar energy-powered systems, clean water filtration and agricultural exploration tools. These essentials will help improve their living conditions, reduce their dependence on external aid, and empower them to lead a self-sufficient life.

#### 2R Recycling & Reforestation

In line with our commitment to the environment, edotco Group in collaboration with Axiata Foundation, Yayasan Hijau Malaysia (YHM) and FatHopes Energy have launched 2R Recycling & Reforestation – starting with the planting of 120 trees in Malaysian nature reserves.

#### Flood Relief Program

In 2022, EDOTCO reconstructing homes for the Orang Asli community in Pahang. These initiatives specifically focused on the restoration of 11 'orang asli' homes located in Kampung Batu 19, Sabai, which were completely devastated by the floods.

In addition to our efforts in reconstructing homes, EDOTCO also undertook an internal clothing donation drive for flood victims. Through this initiative, we collected and donated clothing items to Global Peace Mission Malaysia, benefiting 250 beneficiaries in need.

Immediate rebuilding support is crucial to ensuring the affected families can regain a safe and comfortable living environment and for the community to recover from the aftermath of this disaster.

#### EDOTCO Zakat Wakalah

At EDOTCO, through the Zakat Wakalah program and the provision of tricycles to the 5 identified asnafs, we envision a future where these individuals can break free from the cycle of poverty, enhance their livelihoods, and improve their overall quality of life.

As we move forward, we are committed to fostering more initiatives that positively impact society, championing the cause of those in need, and working hand-in-hand with communities to create a better, more inclusive world for all.

### Pledge on protecting Endangered Birds Nesting on its Towers



In August 2022, The Bird Watch Pledge, which was signed by EDOTCO Group with the Malaysian Nature Society (MNS) at the launch event of EDOTCO's Sustainability Blueprint.

It reflects EDOTCO's commitment towards the conservation of Malaysia's wildlife habitats. According to the Malaysian Nature Society (MNS), telecommunications towers have become a preferred breeding site for wild birds of prey due to their stability, height and location.

However, their nests are often disturbed or destroyed, contributing to a dwindling habitat and reduced population numbers. With over a fifth of Malaysia's 822 bird species classified as Threatened or Near Threatened as of 2020, new conservation strategies are crucial to preserve the ecological balance. experts in the field, and three winners were awarded with cash prizes.

Created in accordance with the Wildlife Conservation Act 2010, EDOTCO's Bird Watch Pledge aims to implement new policies and processes to minimise destruction to bird nests located on its towers, create awareness about the importance of raptor conservation among employees, and collaborate closely with the Malaysian Nature Society (MNS), BirdLife International, Jabatan Perlindungan Hidupan Liar dan Taman Negara Semenanjung Malaysia (PERHILITAN) and similar organisations on relevant bird conservation programmes.

Existing hazard escalation and reporting mechanisms for EDOTCO towers will have to involve the relevant agencies in order to minimise nest management and relocation disruptions. EDOTCO will also work with MNS and PERHILITAN to conduct wildlife monitoring at selected towers in key biodiversity areas and run raptor conservation awareness programmes to educate EDOTCO employees

## Country Highlights

### COUNTRY: BANGLADESH



#### AT A GLANCE

18,998 towers owned and managed

>33,200 lives impacted in the community

>7,000 trees planted

348 employees

#### Sustainability Highlights

##### Environment

- EDOTCO is currently enhancing our green journey & carbon footprint by developing the GHG Inventory and Carbon Roadmap Plan. Supported the GHG Inventory on carbon emissions baseline 2020
- Guided by EDOTCO's Environmental Policy
- Supports EDOTCO Green Office initiatives program
- 486.2 tonne of e-waste collected from site during operations and maintenance work
- Center of design excellence (CoDE) was set up in Bangladesh as a hub of innovation, improvisation, and capacity enhancement for future. CoDE provides structural design related support across the NTCs'
  - Designed and Implemented Tubular tower with approx. savings of 10%.
  - Designed and implemented SPC Street furniture POC with approx. 10% overall savings.
  - Designed and implemented tower design for new wind zone with approx. savings of 4%
  - Designed and implemented new foundation design with approx. savings of 6.7%

##### Social Labour

- Institution of fair employment and welfare - gender inclusivity inclusivity: 5 Female:95Male ratio employment

##### Social Community

- Tower2Community: Provided disaster relief for 2,000 flood affected victims at Sylhet
- Tower2Power: Provided power back up to store vaccines benefitting more than 3200 people.

##### Governance

- Prioritised employee health, safety and well-being
- Certified with ISO 45001 Certification (OHS Management System), obtained in 2020 and maintained in 2022
- Anti-bribery and corruption initiatives in place

#### Sustainability Challenges

On our Sustainability journey in Bangladesh, we faced the following challenges:

- Multiple instances of theft and damage to the equipment, frequently affecting the service we aimed to deliver to these communities.
- Infrequent willingness to cooperate by local communities

#### Forward-Looking Statement

##### TOWER2POWER (T2P)

Installation of Solar panels in 50 Child Development Centres across Bangladesh to ensure power support for >2000 children

##### TOWER2WATER (T2W)

Water Treatment Plant (WTP) to be established within 1 kilometer radius of EDOTCO Bangladesh Tower site in collaboration with BRAC

##### TOWER2COMMUNITY (T2C)

Relief distribution during flood or other natural disasters

##### EDOTCO Rangers

To establish EDOTCO Rangers activity via EDOTCO Voluntary Engagement program such as Winter Clothes Donation and Distribution.

##### Climate Action Plan

- Implement initiatives in line with EDOTCO's Green Framework and Supplier Code of Conduct
- Collaborate with customers and suppliers to tackle GHG Scope 3 emissions

##### Waste Management

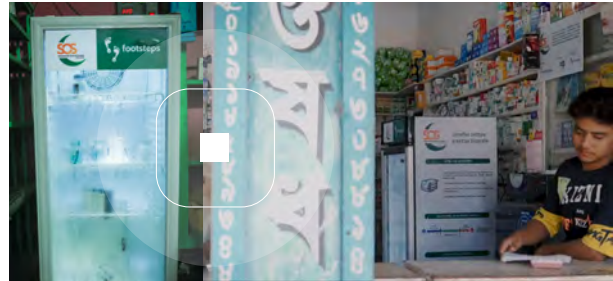
- Contentious support of site waste management and to complete the implementation of Green Office Initiatives



## EDOTCO Bangladesh in the community

### Tower2Power

In the rural areas of Bangladesh, electricity is unstable throughout the day, resulting in vaccine storage at an inappropriate temperature. Hence, EDOTCO Bangladesh provided power backup to refrigerators at two chemist shops during grid failure to ensure the vaccines were stored at the required temperature. Through this initiative, EDOTCO Bangladesh has benefited more than 3200 people in 2 upazilas in Satkhira, Bangladesh.



### Tower2Community

Bangladesh was again hit by floods. Sylhet was the most affected place out of all the different parts of the country. Large parts of Sylhet were under water because of the heavy rains in Assam and Meghalaya, which are upstream from Sylhet. Several thousand people were stuck in Sylhet and Sunamganj because of floods. About 10,000 people took cover in primary schools that were set up as temporary flood shelters. At the request of the local government, the Bangladesh Army was sent to Sylhet to help speed up relief efforts and keep as many people safe as possible during this disaster. As part of its Tower 2 Community programme, EDOTCO Bangladesh gave dry food, medicine, and items for personal hygiene to more than 2,000 flood victims in Sylhet, Bangladesh. This was done to meet their needs.



## Country Highlights

### COUNTRY: PAKISTAN



#### AT A GLANCE

2,234 towers owned and managed

>600 lives impacted in the community

>10,000 trees planted

104 employees

#### Sustainability Highlights

##### Environment

- EDOTCO is currently enhancing our green journey & carbon footprint by developing the GHG Inventory and Carbon Roadmap Plan. Supported the GHG Inventory on carbon emissions baseline 2020
- Guided by EDOTCO's Environmental Policy
- Supports EDOTCO Green Office initiatives program

##### Social Labour

- Supported Group's Diversity, Equity, and Inclusivity (DEI) Council to prioritise and discuss diversity-related matters with greater emphasis on hiring of women
- Institution of fair employment and welfare - gender inclusivity: 1 Female:99 Male ratio employment

##### Social Community

- Tower2Power:** provided Solar Panels, power outlets to community, impacting 150 beneficiaries.
- EDOTCO Food Bank & Family Adoption

##### Governance

- Employee Health, Safety, and Well-being
- Certified with ISO 45001 Certification (Occupational Health & Safety Management System). Obtained in 2021 and maintained for 2022
- Anti-bribery and corruption initiatives

#### Sustainability Challenges

During our pursuit of Sustainability in Pakistan, we encountered the subsequent obstacles:

- The existing constraints on CSR initiatives around EDOTCO tower sites limit the project's scope.
- Budgetary restrictions impose limitations on activities.

##### Tower2Power:

Continue to positively impact lives of communities living without electricity with solar panel installation and provision of lights and fans

##### Tower2Community

###### – Disaster Relief

- Will be conducted as needed in collaboration with non-profit organisations

##### Waste Management

- To implement site waste management
- To complete the implementation of Green Office Initiatives

## Country Highlights

### COUNTRY: PHILIPPINES



#### AT A GLANCE

2,338 towers  
owned and managed

>45 lives impacted  
in the community

100 trees

44  
employees

#### Sustainability Highlights

##### Environmental

- **Established environmental compliance plan** for acquired tower sites from SMART.
- **Planted 500 fruit-bearing trees** in partnership with Department of Environment and Natural Resources (DENR) and People's Organization as part of the Government's Enhanced National Greening Program (eNGP).
- **Adopted Green Initiatives for the office and tower sites**—distribution of reusable dining utensils to employees, use of solar powered aviation lights for Build-to-Suit sites, conversion of generator-powered to grid-powered tower sites.

##### Social Labour

- **Continuously implement flexible working arrangement** to help employees balance work hours and lengthy office commute.
- **Promotes fair employment practices.** Gender diversity is at 2:1 Male to Female Ratio
- **Provided trainings and competency to employees** such as Occupational First Aid Training, 40-hour Basic Occupational Safety and Health Training, Fire Safety Seminar, and Working-at-Heights Training to ensure safe work practices and emergency preparedness.

##### Social Community

- Social Community Framework in place

##### Governance

- Attain zero lost-time incident as of December 2022
- Implements Anti-Bribery and Corruption Policy and Initiatives

#### Sustainability Challenges

On our Sustainability journey in the Philippines, we faced the following challenges:

- **Unstable Grid:** Despite being connected to the grid, certain tower sites, especially in rural areas, continue to rely on generator sets as backup power due to frequent power interruptions.
- **Regulatory Compliance:** Offering green energy alternatives to customers and tower tenants is challenging due to the highly regulated energy sector in the Philippines, which entails complex clearance procedures for operation.



#### Forward-Looking Statements

##### Carbon Footprint Reduction

- EDOTCO Philippines is currently developing its GHG Inventory and Carbon Roadmap Plan to reduce emissions and attain carbon neutral target.

##### Environmental Responsibility

- Aims to plant 1,000 tree seedlings by 2023 to support the Government's National Greening Program.
- Establish a robust solid and hazardous waste management system for office and tower sites to minimize wastes disposed to landfills.

##### Community Service Initiatives

Conduct the following CSR activities:

- "OSH in School" Program to teach the younger generation on the value of Safety in their school and future workplace.
- Share-A-Meal Program for nursery students to raise awareness on proper nutrition for growing children and encourage collective effort from the community to alleviate hunger and malnutrition. EDOTCO Philippines will be supporting the GHG Inventory on carbon emissions baseline.

# Country Highlights

## COUNTRY: SRI LANKA



### AT A GLANCE

1,423 multi-purpose lamp poles owned and managed

>1,700 lives impacted in the community

>1,500 trees planted

16 employees

### Sustainability Highlights

#### Environment

- EDOTCO is currently enhancing our green journey & carbon footprint by developing the GHG Inventory and Carbon Roadmap Plan. Supported the GHG Inventory on carbon emissions baseline 2020
- Collected 0.081 tonne of e-waste during operation and maintenance work
- Guided by EDOTCO's Environmental Policy
- Supports EDOTCO Green Office initiatives program

#### Social Labour

- Gender Diversity: 50:50 gender ratio for employment

#### Social CSR

- Tower2Community, impacted 107 underprivileged students. Employees voluntary contribution of school supplies to students of 'Padaviya Maithree Vidyalaya, school at Anuradhapura District. Employees contribution were utilised to purchase required school supplies.
- Achieve more than 60 volunteer hours via EDOTCO Rangers voluntarism platform

#### Governance

- Occupational Health & Safety Initiatives: 0 incidents at site
- Anti-bribery and corruption initiatives in place

### Sustainability Challenges

On our Sustainability journey in Sri Lanka, we faced the following challenges:

- 2022 Sustainability Challenges were in political and social unrest leading to a change in government
- This had also impacted cost of living and increasing commodity prices as well as economic challenges



### Forward-Looking Statements

#### Tower2Community

- Contribution of school supplies to underprivileged students in "Padaviya Maithree Vidyalaya, school at Anuradhapura District
- To carry out programmes to uplift lives of communities affected by the economic downturn since 2022

#### Volunteer Programme

- EDOTCO Sri Lanka aspires to achieve more than 100 volunteer hours by organising a volunteer project in 2023

## Country Highlights

### COUNTRY: MYANMAR



#### AT A GLANCE

3,071 towers owned and managed

>4,500 lives impacted in the community

94 employees

#### Sustainability Highlights

##### Environment

- EDOTCO is currently enhancing our green journey & carbon footprint by developing the GHG Inventory and Carbon Roadmap Plan. Supported the GHG Inventory on carbon emissions baseline 2020
- Oil waste collected from sites due to operation maintenance work: 4,000liters (20 Drums)
- Guided by EDOTCO's Environmental Policy
- Supports EDOTCO Green Office initiatives program

##### Social Labour

- Institution of fair employment and welfare - gender inclusivity: 43 Female: 61 Male ratio employment

##### Social CSR

- Tower2Community (T2C): more than 3,500 lives impacted to date
- 100% employee volunteerism Tidying Up Our Home activity.
- Employee contribution via salary deduction to provide aid to 1,000 Beneficiaries

##### Governance

- Completed 100% of COVID-19 vaccination and 52% of booster shot
- Anti-bribery and corruption initiatives in place
- COC and DOIF annual acknowledgment

#### Sustainability Challenges

During our pursuit of Sustainability in Myanmar, we encountered the subsequent obstacles:

- Turmoil in Myanmar's political landscape
- Limited accessibility to certain areas due to active conflict zones
- Imposed curfew in restricted regions
- Project delays caused by political unrest and foreign exchange complications



#### Forward-Looking Statements

##### Tower2Community

- Will be conducted as needed in collaboration with non-profit organisations

##### Waste Management

- Continuous improvements on site waste management, specifically on used diesel oil
- Ensuring uninterrupted site cleanliness and organization to mitigate work hazards, with the objective of initiating e-waste collection.



# Country Highlights

## COUNTRY: CAMBODIA



### AT A GLANCE

7,000 towers owned and managed

>2,700 lives impacted in the community

>1,500 trees planted

39 employees

### Sustainability Highlights

#### Environment

- EDOTCO is currently enhancing our green journey & carbon footprint by developing the GHG Inventory and Carbon Roadmap Plan. Supported the GHG Inventory on carbon emissions baseline 2020
- Guided by EDOTCO's Environmental Policy
- Supports EDOTCO Green Office initiatives program
- Donated 103 kg of used cooking oil in conjunction with Earth Day 2022 to Senton Green Recycling Cambodia

#### Social Labour

- Institution of fair employment and welfare - gender inclusivity: 28 Female:72 Male ratio employment
- Award recognition:
  - Employer Branding Award, Asia's Best Employer Brand Award 2022
  - Employer Branding Award, Asia's Best Employer Brand Award 2022, Organisation with innovative HR practices

#### Social CSR

- T2P: Provided lighting and Fans power supply to school via Solar Panel to 1,400 Beneficiaries
- Tower 2 Power, Tower 2 Water. Providing the easier access to clean water and provide the energy to the Primary School for lighting and fan during dry season and evening class. This initiative will benefit to students and nearby community

#### Governance

- Obtained ISO 45001 Certification (Occupational Health & Safety Management System)

### Sustainability Challenges

During our pursuit of Sustainability in Cambodia, we encountered the subsequent obstacles:

- Enhancing familiarity with the ESG framework and delivering pertinent training to all stakeholders
- Enhancing and expanding diversity and inclusion initiatives
- Assessing carbon reduction opportunities



### Forward-Looking Statements

#### OSH in School

- Continuously create a safe environment to avoid any injury in school.
- Introduce basic information on Health & Safety to the students, teachers and other related parties involve with education center.
- Impacts wellbeing in many ways, including physical health, emotional wellbeing, and how to manage stress.

#### Tower2Community: Disaster Relief

- Will be conducted as needed in collaboration with non-profit organizations or
- Manage internally with voluntary of our own employees.

#### Climate Action Plan

- Deployment of Low -Cost Structure/ Just Nice Tower (approximately 20% less structure tonnage, approximately 25% carbon emission reduction, approximately 30% decrease in steel usage)
- Research and development collaboration students, teachers and other related parties involve with education center.

- Impacts wellbeing in many ways, including physical health, emotional wellbeing, and how to manage stress. employees.

#### Waste Management

- To implement site waste management
- To introduce recycling program and e-waste collection
- To maintain the implementation of Green Office Initiatives
- To obtain single Certificate of ISO 45001 (OHS Management System) in 2023.

## Glossary

<b>5R</b>	Right People, Right Skills, Right Job, Right Cost, Right Time
<b>ABAC</b>	Anti-Bribery and Anti-Corruption
<b>ABMS</b>	Anti-Bribery Management Systems
<b>AML</b>	Anti-Money Laundering
<b>BAC</b>	Board Audit Committee
<b>BAKTI</b>	Badan Aksesibilitas Telekomunikasi dan Informasi
<b>BCM</b>	Business Continuity Management
<b>BD</b>	Bangladesh
<b>BIA</b>	Business Impact Analysis
<b>BRAC</b>	Bangladesh Rehabilitation Assistance Committee
<b>BRCC</b>	Board Risk & Compliance Committee
<b>BNRC</b>	Board Nomination and Remuneration Committee
<b>BUET</b>	Bangladesh University of Engineering
<b>BYOD</b>	Bring Your Own Device
<b>B2S</b>	Built-To-Suit
<b>CH<sub>4</sub></b>	Methane
<b>CIPM</b>	Certified Information Privacy Manager
<b>CO</b>	Carbon Monoxide
<b>CoDE</b>	Centre for Design Excellence
<b>CO<sub>2</sub></b>	Carbon dioxide
<b>CSR</b>	Corporate Social Responsibility
<b>CV</b>	Curriculum vitae
<b>DAS</b>	Distributed Antenna Systems
<b>DEI</b>	Diversity, Equity and Inclusion
<b>DICT-UNDP</b>	Department of Information and Communications Technology - United Nations Development Programme
<b>DLP</b>	Data Loss Prevention
<b>DNB</b>	Digital Nasional Berhad
<b>DQ</b>	Developmental quotient
<b>EBITDA</b>	Earnings Before Interest, Taxes, Depreciation, and Amortisation
<b>EQ</b>	Emotional quotient
<b>ERGs</b>	Employee Resource Groups
<b>ERM</b>	Enterprise Risk Management
<b>ESG</b>	Environmental, Social and Governance
<b>EVE</b>	Employee Voluntary Engagement
<b>GAW</b>	Global Atmosphere Watch
<b>GDS</b>	Gifts, Donations and Sponsorships
<b>GHG</b>	Greenhouse Gas

<b>GJ</b>	Gigajoule
<b>GPM</b>	Global Peace Mission
<b>GRC</b>	Governance, Risk and Compliance
<b>GRI</b>	Global Reporting Initiatives
<b>HIRARC</b>	Hazard Identification, Risk Analysis and Risk Control
<b>HR</b>	Human Resources
<b>IACP</b>	Integrity and Anti-Corruption Plan
<b>ID</b>	Indonesia
<b>IQ</b>	Intelligence quotient
<b>ISO</b>	International Organization for Standardization
<b>ITU</b>	International Telecommunication Union
<b>IVS</b>	Intelligent Ventilation System
<b>Jendela</b>	Jalanan Digital Negara
<b>KeTSA</b>	Kementerian Tenaga dan Sumber Asli
<b>kg</b>	kilogramme
<b>KH</b>	Cambodia
<b>kWp</b>	Kilowatt peak
<b>KYC</b>	Know-Your CounterParty
<b>Li-ion</b>	Lithium Ion
<b>LXP</b>	Learning Experience Platform
<b>M&amp;A</b>	Merger and Acquisition
<b>MAB</b>	Malaysian Association for the Blind
<b>MACC</b>	Malaysian Anti-Corruption Commission
<b>MAIWP</b>	Majlis Agama Islam Wilayah Persekutuan
<b>MCMC</b>	Malaysian Communications and Multimedia Commission
<b>MDM</b>	Mobile Device Management
<b>MET</b>	Malaysian Meteorological Department
<b>MFA</b>	Multi-Factor Authentication
<b>MISA</b>	Master Infrastructure Service Agreement
<b>MM</b>	Myanmar
<b>MY</b>	Malaysia
<b>NaaS</b>	Network as a Service
<b>NaPA</b>	Network and Planning Analytics
<b>NACP</b>	National Anti-Corruption Plan
<b>NCSM</b>	National Cancer Society Malaysia
<b>NIST</b>	National Institute of Standards and Technology
<b>NTCs</b>	National Tower Companies
<b>PAM</b>	Privilege Access Management
<b>PATAMI</b>	Profit after Tax and Minority Interests
<b>PH</b>	Philippines

## Glossary

PK	Pakistan
PPA	Power Purchase Agreement
PPR	Projek Perumahan Rakyat
RAN	Radio Access Network
RCSA	Risk Control and Self-Assessment
RO	Reverse Osmosis
RPTC	Related Party Transaction Committee
R&C	Risk & Compliance
O&M	Operations and maintenance
OHS	Occupational Health and Safety
SAQ	Site Acquisition

SDGs	Sustainable Development Goals
SL	Sri Lanka
SteerCo	Steering Committee
SCOC	Supplier Code of Conduct
TRCSL	Telecommunications Regulatory Commission of Sri Lanka
UI.EP	Uncompromising Integrity, Exceptional Performance
UNGC	United Nations Global Compact
USF	Universal Service Fund
VRLA	Valve regulated Lead-acid
YBSB	Yayasan Bunda Siti Banun



Scan here to view the full version our  
**Sustainability Report 2021**



Scan here to view the full version our  
**Sustainability Report Update 2022**

**[edotcogroup.com/sustainability](https://edotcogroup.com/sustainability)**



**EDOTCO GROUP SDN BHD**

Laman EDOTCO, Block D  
Dataran PHB, Saujana Resort, Section U2  
40150 Shah Alam, Selangor, Malaysia