

dtac Anti-Corruption Handbook

“dtac has zero tolerance and is firmly opposed to all forms of corruption.”



What you need to know

What you must do

What you need to be aware of

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Key Message

- dtac has zero tolerance on Corruption and Bribery.
- We are responsible every day.
- We are transparent and seek guidance when in doubt.
- Any corrupt activity - either in public or private sector - is prohibited.
- You must never ask for, accept or receive offer or give a bribe or facilitation payment.
- If you become aware of an infringement of laws, regulations or the dtac Way framework, you shall raise this issue with your leader. If this is not possible you shall raise the issue or report the infringement directly to the dtac Ethics and Compliance Officer.

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Introduction

dtac's Code of Conduct clearly states that we are firmly opposed to all forms of corruption.

dtac is firmly opposed to corruption in all forms. For dtac, anti-corruption is not only a legal obligation and an ethical standpoint. Corruption is a threat to business and society in all countries. It undermines legitimate business activities and distorts competition. It ruins reputation and exposes individuals to risks.

dtac has zero tolerance on corruption and is committed to doing business in accordance with the highest ethical standards.

For the most part, activities involving business courtesies are part of normal business practice. It is important, however, that we are always transparent, reasonable and have a lawful business interaction.

This handbook is intended as a practical tool to help you, as a dtac employee, to follow dtac's values and formal

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rules relating to anti-corruption. As an employee in dtac you may find yourself in or experience situations where there is a risk of corruption. This could be in relation to receiving or giving gifts and business courtesies such as promotional items, meals, entertainment and other benefits – things of value – such as gifts.

The handbook cannot provide answers to every situation and dilemma that you may face and you are strongly encouraged to seek advice when in doubt.

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Your responsibility

As an employee in dtac, you share a responsibility to ensure that we comply with dtac's standards. In relation to anti-corruption it is therefore important that you read and understand our Code of Conduct, Anti-Corruption Policy and No Gift Manual.

This includes that you:

- Have this handbook available
- Take part in anti-corruption training programs and implementation activities
- Ask for advice if you are unsure about aspects relating to the Code of Conduct, Anti-Corruption Policy or other dtac governing documents

Should you become aware of an infringement of laws, regulations or dtac Way framework, you shall raise this issue with your leader. If this is not possible or appropriate you shall raise the issue or report the infringement directly to the dtac Ethics and Compliance Officer.

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Managers' responsibility

As a manager in dtac, you have a responsibility to ensure that people in your team are aware of and follow the requirements in dtac Way Framework.

When we relate this to anti-corruption, the leaders should focus on the requirements in the Code of Conduct related to anti-corruption, dtac Policy Anti-Corruption, and No Gift Manual

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dtac Way

To successfully navigate the changes around us and to capitalize on the opportunities, we have defined a strong platform for the future growth. This is summarised in the dtac Way. It defines our aspirations and sets the standard for how we do business.

Relating this to the anti-corruption work in dtac, you shall always consult dtac Anti-Corruption policy and the Code of Conduct when you are uncertain on which rules and principles to follow in dtac related to corruption issues. When you face corruption dilemmas linked to our suppliers or business partners, you should consult Sustainable Supply Chain Policy with accompanying Manuals and Guidelines.

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Anti-Corruption

What you need to know

Corruption undermines legitimate business activities and distorts competition. Thus, corruption ruins reputation and exposes individuals to risks.

dtac is firmly opposed to all forms of corruption and makes active efforts in order to ensure that it does not occur in our business activities.

What you must do

- You must never ask for, accept, receive, offer or give a bribe.
- If you are in doubt as to whether the action you are about to do is within dtac's Code of Conduct, dtac Policy Anti-Corruption and No Gift Manual, you shall contact your immediate superior for clarification. If not a clearly minor issue, such inquiries and clarifications shall be documented.

If you, or your immediate superior, are in doubt as to the legality of an action or how to interpret dtac Policy

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Anti-Corruption, you shall seek legal advice with Legal Governance unit.

What you need to be aware of

- A bribe is when someone attempts to influence a third party's decision in an improper manner by offering an undue or improper advantage. Any corrupt activity either in public or private sector is prohibited.
- An improper advantage can have different forms, for example in the form of cash, cash equivalents, gifts, credits, discounts, travel, personal benefits, accommodation or services.

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Q & A

Q: According to the Code of Conduct, dtac is opposed to all forms of corruption. What is the meaning of the term “corruption”?

A: An act of corruption will be if any person requests, receives, accepts, gives or offers any kind of improper advantage, favor or incentive in connection with a position, office or assignment. These “improper advantages” can take many forms, such as cash, cash equivalents, gifts, credits, discounts, travel, personal benefits, accommodation or services among others.

(Please see the dtac Policy Anti-Corruption.)

Q: I am in doubt as to whether a situation might be improper under dtac Policy Anti-Corruption. What do I do?

A: Assess the situation carefully, and ask your immediate superior for guidance. If still in doubt, seek advice with Legal Governance Unit.

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Facilitation Payments

What you need to know

Facilitation payments are small amounts paid to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement. Even though they may be commonplace, such payments are considered illegal bribes in most countries.

dtac is against facilitation payments and you shall not pay if faced with demands.

In exceptional circumstances, such as where life, health or property is perceived to be in danger and no other alternatives exists, such payments may be considered. In such an exceptional situation you must exercise the best possible judgment you can and consult with your superior and/or Legal Governance Unit.

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What you must do

- Make sure that our respective customers and business partners are informed about our policy regarding facilitation payments and that we do not pay.
- Identify and report the risk of facilitation payments and consider and prepare measures to reduce this risk.
- Consider how this risk can be handled in contracts with business partners, customers, suppliers and public officials
- If you are uncertain, please consult your superior or legal division.

What you need to be aware of

- Information about complaints made towards potential or existing business partners and middlemen regarding facilitation payments.
- Situations with a high risk of facilitation payments:
 - Official approvals, permits and licenses
 - Customers clearance
 - Work permits and visas

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Q & A

Q: What is a facilitation payment?

A: Facilitation payments can be described as a payment made to foreign officials, government employees or members of political parties and so forth in order to encourage the person to expedite routine governmental actions as processing papers and issuing permits. Hence, as payments for a routine service that the receiver of the payment is obliged to perform.

dtac views facilitation payments as a form of corruption and is opposed to all forms of corruption.

“You shall refuse to pay unless you have reason to believe that your own or other’s life, health or property could be in danger or other exceptional circumstances exist [. . .]”

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Gifts

What you need to know

Exchanging gifts are often part of local culture and tradition. However, the distinction between corruption, gifts and business courtesies can be difficult to draw. Due care must therefore be exercised.

According to dtac No Gift Manual, you are not allowed to offer, give, accept or receive Gifts to/from External Parties. However, an exception to this business principle is described in Mandatory Requirements for Exceptions. If you, or your immediate superior, are in doubt as to the legality of an action or how to interpret this dtac “No Gift Manual”, you shall seek advice from dtac Ethics and Compliance officer or dtac Anti-Corruption Officer.

We shall always use prudent judgment and consider dtac’s reputation and integrity as the ultimate guideline.

What you must do

- All dtac Personnel are responsible for complying with Code of Conduct, Policy Anti-Corruption, No Gift Manual and all applicable anti-corruption laws in the performance of their duties

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- If you, or your immediate superior, are in doubt as to the legality of an action or how to interpret this dtac “No Gift Manual”, you shall seek advice from dtac Ethics and Compliance Officer or dtac Anti-Corruption Officer.

What you need to be aware of

- A gift may be given in a customary business event to External Parties only when the requirements set out in the Manual No Gift are complied with.
- Approval of gifts can be different depending on circumstances, therefore; you need to make sure that it is complied with the requirements set out in “No Gift” Manual.
- Cash or Cash equivalent, which means gifts that are easy to convert to cash are never allowed.

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Q & A

Q: What is meant by a “gift”?

A: Anything of value given by a person/ company to another without direct demand for compensation. A gift can be an object or take the form of other advantage such as e.g. receiving VIP status or membership(s) in golf clubs.

Q: What if a gift consists of cash or cash equivalent?

A: No. Gifts in the form of cash, or cash equivalent, are never allowed.

Q: Can I receive a gift in connection with contractual negotiations?

A: Gifts given or received in connection with contractual negotiations are likely to raise suspicion of bribery. The main rule is that you shall not offer or accept gifts in any situations, unless it follows the requirements stipulated in No Gift Manual.

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Arrangements

What you need to know

Arrangements and representations may take various forms such as events, meals, concerts and trips. Offering and accepting arrangements can be a legitimate part of our business and can build goodwill and foster a good business relationship. Our business decisions shall always be based on what is in dtac's best interest.

dtac Policy Anti-Corruption states that you are allowed to arrange or attend customary business related arrangements. Examples are dinners, lunches, receptions or other type of representations. However, the costs shall always be kept within reasonable limits. What is reasonable can depend on the situation.

Expensive or extravagant arrangements are not to be attended. Your immediate superior may approve attendance on such arrangement only if it is required from a business perspective.

We shall always use good judgment and consider dtac's reputation and integrity as the ultimate guideline.

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What you must do

- In advance assess whether the arrangement or representation is deemed as an improper advantage and thus illegal.
- You should consider:
 - Purpose of the arrangement
 - Form and content of the arrangement
 - Situation in which the arrangement is held
 - Value and nature of the arrangement
- Ask a superior if you are unsure, even if you have the authority to make a decision to attend yourself.

What you need to be aware of

- Arrangements that also includes partners/ spouses.
- Invitations to arrangements that do not have a real business agenda.
- Arrangements that can be perceived by others to have as their purpose to unduly influence business decisions.

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- Arrangements in connection with contractual negotiations.
- Arrangements that are subject to personal taxation.
- Arrangement that are offered for something in return.

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Q & A

Q: I have been invited to an event with professional content. Food and lodging is paid for by the host. May I attend?

A: Yes, provided that the cost of accommodation such as food and lodging are kept within reasonable limits.

Q: At the same event, the host also offers to pay for travel. Is it allowed?

A: No, dtac's main rule is that each party shall pay for its own travel to and from an event. Exceptions to this rule might occur in special circumstances.

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Public Authorities

What you need to know

To avoid any suspicion or appearance that dtac attempts to influence public authorities, dtac Anti-Corruption Policy requires you to always follow No Gift Manual with respect to gifts and arrangements involving public authorities, including international organizations and NGOs (Non-Governmental Organizations).

What you must do

You shall as a business principle and main rule not accept or receive gifts from External Parties.

What you need to be aware of

Public authorities may have strict rules on what they may receive. You shall always check whether a gift or an arrangement is compliant with such rules. More importantly, the gifts given shall be in compliance with No Gift Manual.

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Q & A

Q: The Parliament is currently considering a new act which will have impact on dtac's business operations. We are considering using a lobbyist to front dtac's views towards the public authorities. How do we proceed?

A: Use of a lobbyist in this case might be desirable and legitimate. Any use of a lobbyist shall, however, be made in an open and transparent manner, and you shall ensure that it is promptly disclosed to the public authorities that the lobbyist represents dtac. You shall have a written agreement with the lobbyist in which this obligation is included.

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Relations with third parties

What you need to know

dtac recognizes that our Business Partners, whether new investments, partners, agents, consultants, contractors, or suppliers, will be associated with dtac.

dtac could also be held liable for corrupt or fraudulent activities conducted by third parties with whom dtac has a contractual relationship.

Dtac needs to limit the risk that third parties commit or attempt to commit any corrupt or fraudulent activity that may be connected to dtac.

Due care shall be exercised with respect to the selection and use of Business Partners so that dtac does not become involved in corrupt activities. Before selecting a Business Partner, you shall always consult Anti-Corruption Officer or Head of Legal. If the integrity Due Diligence (IDD) reveals information indicating an unacceptable risk, the Business Partners shall not be engaged, unless it is documented that the risk is satisfactorily mitigated.

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What you must do

- Ensure that the business partner's reputation and expertise is satisfactory.
- Follow dtac Manual Integrity Due Diligence Business Partner when required.
- Follow dtac Policy Sourcing and dtac Policy Supply Chain Sustainability when relevant

What you need to be aware of

The following "red flags" may indicate an unacceptable risk in relation to middlemen and business partners:

- The business partner may not be willing to certify that he/she will not take unlawful actions.
- Unusual payment patterns (including payment to "tax-havens").
- Lack of transparency in expenses and accounting
- Apparent lack of resources or qualifications.
- Kickbacks or similar.
- Fees are not proportionate to the services provided.
- Business reputation and track

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Q & A

Q: What does dtac mean by “Business Partners”?

A: Business Partners in this context means:

- Joint venture partners,
- Agents and consultants who act as a point of contact between dtac and a third party, other intermediaries and middlemen, and
- Other contracting parties that may pose a particular corruption risk or other integrity risk due to factors such as the country and the sector in which the engagement is carried out, the nature and reputation of the contracting party, and the nature of engagement.

This does not include:

- Suppliers/vendors which are supplying goods or services to dtac and which are not acting as an intermediary or point of contact to towards a third party. Customers
- Standard distribution-agreements or similar agreements.

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Consequences of Corruption

Damage to dtac's integrity may have direct and indirect cost implications, including exposure to large fines, losses and business failures and damage to reputation.

The consequences of corruption could be facing legal penalties and criminal charges for you and for your management, and for our company. It could also compromise dtac's reputation as a trusted partner at the global arena.

The financial impact may be significant. Incidents of corruption may lead to fall in shareholder value, threat of serious legal sanctions, lost business deals, lost support from customers, suppliers, investors, the public and regulators.

Remember: Both acts of corruption and attempts of such behavior represent a breach of our Code of Conduct, dtac Policy Anti-Corruption and No Gift Manual.

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Other regulations and guidelines

This handbook is related to matters connected to anti-corruption and in particular related to dtac Anti-Corruption Policy. However, other documents within the dtac Way are, of course, relevant and, depending on the situation, you should also consult these.

You may always consult and discuss these issues with dtac Ethics and Compliance Officer. Your communications are required to be treated confidentially. If you feel that the dtac Ethics and Compliance Officer is not an option, you should use “Hotline to Compliance”.

Any disclosure of your information will be treated very carefully. The persons involved in handling the case shall maintain confidentiality. dtac does not tolerate reprisals or retaliation against those who in good faith report an apparent.

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Q & A

Q: dtac Policy Anti-Corruption sets high standards for giving and accepting gifts and courtesies. Still I experience that my boss and other managers in my department may not have gotten the message. What should I do?

A: Our business standards apply to everybody in

dtac regardless of their position or stature. Even if you are not comfortable raising your concern – you are obliged to do so.

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