

ANTI-BRIBERY AND ANTI-CORRUPTION (ABAC) POLICY STATEMENT

PT XLSMART Telecom Sejahtera Tbk (hereinafter to be read as "XLSMART") takes pride in being one of the leading telecommunications providers in Indonesia. XLSMART has a goal to connect every Indonesian for a better life.

Our culture is defined by Integrity, Customer at Heart, Act Like Owners, Rise as One, and Enjoy Every Step ("i-CARE"). These values guide how we work, make decisions, and collaborate every day, helping us build a positive, responsible, and customer-focused workplace where we grow and succeed together.

- Integrity as License to Play— Integrity is a non-negotiable foundational value. It is a basic requirement for participation in XLSMART organization.
- Customer at Heart – Strive to deeply understand customer needs through active listening and continuously improve to deliver the exceptional experience for our customers.
- Act like Owner – Responsibilities are carried out end-to-end to achieve excellent results, wholeheartedly and efficiently to achieve the best outcomes for XLSMART.
- Rise as one – Embrace diverse perspectives, opinions, and feedback are welcomed and valued, enabling effective collaboration to grow and win together.
- Enjoy Every Step – A joyful work environment is created by simplifying complexities and building positive energy, while victories are consistently celebrating wins and learn from mistakes together.

XLSMART recognises and strongly believes that its stakeholders are fundamental to the successful pursuit of its business goals. It is committed to zero tolerance of any forms of bribery and corruption in the course of its business. XLSMART's belief is that no one business opportunity or relationship is valued more than the brand and reputation of XLSMART, its subsidiaries, associates and investee companies.

XLSMART strictly prohibits the receipt and the giving of bribes or participation in any acts or situations that may lead to or be perceived as bribes. The stakeholders are also required to adhere to XLSMART's ABAC governance instruments (Framework, Policies and Procedures, Code of Conduct) which will be governed by XLSMART's dedicated Risk & Compliance division.

All stakeholders including but not limited to our BOC, BOD, employees, business associates, agencies, distributors, vendors, and consultants play an important role in XLSMART's commitment to conducting its business fairly, impartially and in full compliance with all applicable laws and regulations in Indonesia.

To keep abreast of the developments, XLSMART reserves the right to update the policies and any other Governance Instruments. It will take necessary action consistent with XLSMART's Governance Instruments against persons that do not comply with it, including but not limited to terminating all work or business relationships.

XLSMART communicates in an open, transparent and honest manner without fear of repercussion or retaliation, through a whistle-blowing channel called "Speak Up Channel". Retaliation and discrimination against anyone who reports in good faith incidents of non-compliance or violation(s) of XLSMART's policies will not be tolerated. Please refer to the Whistleblowing/Speaking Up policy & procedures and Speak Up channel to report any concerns about any non-compliance and unethical practices.

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