

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

Ncell Axiata Limited (“Ncell”) has been working in Nepal since 2004 as the first private mobile operator in the country. We are committed to be the best local mobile network for the people living in the country. We provide services of international quality with a local touch. Most of our employees are Nepali and our services are designed to meet the needs of the local society.

We are constantly working towards the goal of connecting every Nepali through our network, providing high-quality modern services to consistently create better value for our customers and business partners.

Ncell recognises and strongly believes that its stakeholders are fundamental to the successful pursuit of its business goals. Ncell embraces and strongly upholds its beliefs and core values of Uncompromising Integrity and Exceptional Performance. It is committed to zero tolerance of any forms of bribery and corruption in the course of its business. Ncell’s belief is that no one business opportunity or relationship is valued more than the brand and reputation of Ncell.

Ncell 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 Ncell’s ABAC governance instruments (Framework, Policies and Procedures, Code of Conduct) which will be governed by Ncell.

All stakeholders, including Ncell’s Directors, employees and business associates that Ncell has business relationships or obligations with, play an important role in Ncell’s commitment to conducting its business fairly, impartially and in full compliance with all applicable laws and regulations in Nepal.

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

Ncell communicates in an open, transparent and honest manner without fear of repercussion or retaliation by adopting 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 the Ncell’s policies will not be tolerated. Ncell encourages its employees,

suppliers, business partners, contractors, customers and other Stakeholders to voice their concerns, including actual or suspected misconduct, illegal or unethical behaviour. Please refer to the Whistleblowing/Speaking Up policy & procedures and Speak Up channel to report any concerns about any non-compliance and unethical practices.