



## Supplier Code of Conduct

At **StarHub**, we are committed to conducting business with integrity, accountability, and respect for people and the planet. As part of this commitment, we expect the same high standards from our suppliers, who are critical partners in delivering outstanding products and services to our customers and in driving positive impact for society.

This Supplier Code of Conduct (“Code”) outlines the minimum standards and expectations **StarHub** places on all suppliers—including their employees, contractors, agents, and business partners—who provide goods and/or services to **StarHub**. It reflects our shared responsibility to uphold ethical practices, comply with all applicable laws and regulations, ensure safe and healthy working conditions, protect the environment, and promote fair and inclusive workplaces.

Suppliers are expected to understand and implement the principles set forth in this Code throughout their operations and supply chains. Compliance with this Code is a condition for doing business with **StarHub**. Any failure to adhere may result in disqualification from current and/or future business opportunities.

By working together in accordance with these standards, we can build resilient, responsible, and sustainable supply partnerships that benefit our customers, communities, and the world we share.

### Legal and Regulatory Compliance

Suppliers must conduct their business in full compliance with all applicable laws, rules, and regulations in the countries where they operate and where goods and services are delivered to **StarHub**. This includes, but is not limited to, legal and regulatory requirements related to labour, health and safety, the environment, trade, data protection, cybersecurity, and anti-corruption.

**StarHub** expects all suppliers to stay informed of relevant legal obligations and to implement appropriate policies and controls to ensure ongoing compliance across their operations and supply chains.

### Ethical Business Practices

**StarHub** expects all suppliers to uphold the highest standards of business integrity, transparency, and professionalism in every aspect of their operations. The following principles are integral to maintaining a responsible and ethical supply chain:

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## **Fair Business Conduct**

Suppliers must engage in fair and lawful competition. All business practices must comply with relevant antitrust and competition laws in the jurisdictions where they operate. Suppliers shall avoid any form of anti-competitive behaviour, including collusion, price fixing, bid rigging, or market allocation. All commercial decisions—such as pricing, sales terms, and customer segmentation—must be made independently, without coordination or communication with competitors.

## **Anti-Corruption**

StarHub maintains a zero-tolerance policy toward corruption in all its forms. Suppliers must conduct their business dealings with integrity and must not offer, promise, solicit, or accept bribes or any other improper advantage—whether directly or indirectly—as a means of securing or influencing business with StarHub. Bribes may include, but are not limited to, cash, gifts, services, hospitality, or other personal benefits.

## **Anti-Fraud**

Fraudulent conduct undermines trust and violates the core values StarHub upholds. Suppliers must not engage in fraud, which includes intentional misrepresentation, falsification of records, embezzlement, or providing false or misleading information during the course of doing business with StarHub. All actions and documentation must be honest, accurate, and auditable.

## **Prevention of Tax Evasion**

StarHub and its suppliers are expected to operate in full compliance with all tax-related laws and obligations. Suppliers must not participate in or facilitate tax evasion in any form. This includes knowingly assisting others to evade taxes or failing to report income or relevant financial transactions as required by law.

## **Gifts and Entertainment**

StarHub requires that all business interactions remain free of improper influence. Suppliers must exercise discretion and moderation when offering or accepting gifts or hospitality. Gifts or hospitality offered must be of nominal value, infrequent in nature, and not intended to secure an improper business advantage. Under no circumstances should gifts or entertainment be offered to any StarHub employee with the intent to influence, or that could be perceived as influencing, a business decision. Suppliers must comply with applicable legislation, including the Penal Code 1871 and the Prevention of Corruption Act 1960, and avoid any actions that could give rise to conflicts of interest or reputational harm.

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### **Conflicts of Interest**

Suppliers must avoid any situation—actual, potential, or perceived—that may create a conflict between their interests and those of **StarHub**. Any such situations must be disclosed to **StarHub** promptly and transparently to ensure appropriate mitigation and continued trust.

### **Use of StarHub Name and Brand**

Suppliers must not use **StarHub's** name, logo, trademarks, or other brand identifiers in any communications, marketing materials, or public statements without **StarHub's** prior written approval. This includes references on websites, presentations, case studies, and social media.

Suppliers must not make any statements or take any actions—whether public or private—that could damage or misrepresent **StarHub's** brand, reputation, or business interests. **StarHub** reserves the right to take appropriate action in response to any unauthorised use or reputational harm.

### **Social Media Responsibility**

Suppliers are expected to use social media responsibly and in a manner that reflects professionalism, accuracy, and respect. They must protect **StarHub's** reputation and brand identity in all online engagements and avoid sharing false, defamatory, or misleading content that could damage the image of **StarHub** or its stakeholders.

### **Accurate Record Keeping**

Maintaining accurate, complete, and transparent records is essential to ethical business operations. Suppliers must ensure that all business and financial records related to their dealings with **StarHub** are truthful, current, and maintained in accordance with applicable legal and regulatory requirements. These records should be available for review upon reasonable request.

### **Human and Labour Rights**

**StarHub** is committed to upholding and promoting the fundamental human rights of all individuals throughout our operations and across our supply chain. We expect our suppliers to demonstrate the same level of commitment by adopting practices that protect and respect the dignity, safety, and wellbeing of every worker, regardless of their role, location, or background.

### **Respect for Human Rights**

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Suppliers must uphold internationally recognised human rights standards, including the principles articulated in the International Bill of Human Rights and the core conventions of the International Labour Organization (ILO). Suppliers are expected to operate in a manner that supports, respects, and does not infringe upon the rights and freedoms of individuals in all jurisdictions where they do business.

### **Prohibition of Child Labour**

StarHub maintains a strict zero-tolerance policy toward the use of child labour. Suppliers must not employ individuals below the minimum legal working age as defined by local laws and regulations, or, where stricter, the standards set by the International Labour Organization (ILO). Under no circumstances should suppliers engage children in hazardous, exploitative, or harmful work.

Suppliers are expected to implement robust policies and procedures to verify the age of all employees and ensure compliance throughout their operations and supply chains. This includes conducting regular due diligence, maintaining appropriate employment records, and taking corrective action immediately if any instance of child labour is identified. Suppliers must also ensure that young workers—where permitted—are not exposed to conditions that compromise their safety, wellbeing, or access to education.

### **Prevention of Harassment and Abuse**

All individuals must be treated with dignity and respect in the workplace. Suppliers must ensure that their working environments are free from any form of harassment or abuse, including physical violence, sexual misconduct, verbal abuse, intimidation, psychological coercion, and degrading treatment. Suppliers are encouraged to educate their employees on appropriate workplace conduct, provide access to safe reporting channels, and take timely corrective action in response to any incident of misconduct.

### **Non-Discrimination**

Suppliers must promote a workplace culture that is inclusive, equitable, and free from discrimination. Employment-related decisions—including recruitment, promotion, compensation, training, and termination—must be based on objective criteria such as qualifications, performance, and merit. Discrimination based on race, ethnicity, gender, religion, nationality, age, disability, sexual orientation, gender identity, marital status, or any other legally protected characteristic is strictly prohibited.

### **Ethical Employment Practices**

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Suppliers must ensure that their employment practices comply with all applicable labour laws and regulations, including those relating to minimum wage, working hours, overtime compensation, and statutory benefits. Employment must be freely chosen, and no worker should be subjected to forced labour, exploitative conditions, or unreasonable restrictions. Employees must be provided with written contracts that clearly define the terms and conditions of their employment. Recruitment must be conducted ethically, without the charging of recruitment fees or the requirement to surrender personal documents. Migrant workers, in particular, must be treated fairly and with equal protection under the law.

### **Freedom of Association and Collective Bargaining**

StarHub respects the rights of workers to freely associate and engage in collective bargaining. Suppliers must allow employees to form or join trade unions or other employee associations of their own choosing without fear of reprisal, intimidation, or interference. Suppliers must not obstruct peaceful assembly or the lawful exercise of collective representation rights.

### **Freedom of Movement**

Suppliers must not impose restrictions that infringe on the personal freedom or mobility of their employees. This includes practices such as withholding passports, imposing unreasonable curfews, or restricting movement between work and accommodation sites. Employees must be free to enter and leave the workplace and their place of residence in accordance with applicable laws and employment agreements.

### **Workplace Health, Safety and Quality Standards**

StarHub is committed to fostering a culture of safety, wellness, and quality throughout our value chain. We expect our suppliers to uphold these same standards by providing safe working environments and ensuring that all goods and services delivered meet agreed quality and safety expectations.

### **Healthy and Safe Working Environment**

Suppliers must implement structured health and safety policies and management systems that safeguard employees' wellbeing and prevent workplace incidents. These systems should be designed to actively identify and mitigate risks, encourage continuous improvement, and ensure compliance with all applicable occupational health and safety laws and regulations.

All employees must be provided with suitable personal protective equipment and tools, which are regularly maintained and replaced as necessary. The working environment

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should be clean, secure, and designed to prevent accidents, injuries, and occupational illnesses. Suppliers must also ensure that employees receive training that is relevant to their roles and responsibilities. This includes instruction on safe work practices, proper equipment usage, emergency response, hazard identification, and other key topics. Regular refresher training must be conducted to keep employees informed about evolving standards and legal requirements.

### **Safety of Goods and Services**

The safety of all goods and services provided to **StarHub** is paramount. Suppliers must ensure that their offerings fully comply with all applicable product safety laws and regulations. All goods must be free from defects that could present a risk to users and must be appropriately designed, labelled, and packaged to minimise potential hazards.

Suppliers are responsible for maintaining effective safety monitoring systems across all phases of production and delivery. Should any product or service present a safety concern, suppliers are expected to act swiftly to investigate the issue, notify **StarHub**, and implement corrective measures to resolve it.

### **Product and Service Quality**

**StarHub** expects suppliers to deliver goods and services that meet or exceed the performance and quality standards outlined in their contractual agreements. To ensure consistency and reliability, suppliers must have established quality management systems that oversee all aspects of their operations.

These systems should include regular inspection and testing routines, documentation of conformance with specifications, and mechanisms for identifying, resolving, and preventing quality issues. Suppliers must demonstrate a commitment to continuous improvement, ensuring that all deliverables remain dependable and aligned with **StarHub's** expectations and regulatory obligations.

### **Corporate Social Responsibility and Environmental Management**

**StarHub** recognises that long-term business success must go hand in hand with positive contributions to society and the environment. We expect our suppliers to share this commitment and to adopt responsible practices that support communities, protect natural ecosystems, and uphold sustainable development.

### **Corporate Social Responsibility**

**StarHub** is committed to delivering positive impact to uplift and empower local and underserved communities through leveraging our digital resources and expertise. We

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encourage our suppliers to similarly engage in community-focused efforts and to seek opportunities to contribute positively to social causes. This may include volunteering, charitable giving, inclusive hiring practices, and support for local development programmes that benefit the vulnerable or underserved communities.

## **Environmental Management**

Suppliers must take proactive steps to minimise the environmental impact of their operations. They are encouraged to adopt environmental management systems and sustainability practices that promote responsible resource use, reduce waste, and protect biodiversity. This includes reducing deforestation, avoiding harm to ecosystems, and ensuring the responsible consumption of materials and energy.

Compliance with local and international environmental regulations is mandatory. Suppliers must manage waste appropriately, including the safe handling and disposal of toxic and hazardous substances, and must comply with requirements for waste segregation, air emissions, and pollution control.

All suppliers are expected to calculate, monitor, and actively reduce their greenhouse gas (GHG) emissions and energy consumption across both their operations and value chains. Upon request, suppliers should be prepared to set targets for reducing their Scope 1, Scope 2, and Scope 3 emissions in alignment with StarHub's sustainability goals. In addition, suppliers may be required to provide carbon footprint data—including Scope 1 and 2 emissions, as well as product life cycle assessments—developed in accordance with recognised standards such as the GHG Protocol, ISO 14040, or ISO 14044.

Suppliers are encouraged to minimise environmental impacts across all stages of the product life cycle—including design, manufacturing, distribution, use, and end-of-life—by adopting circular economy principles wherever feasible. This includes prioritising the use of recycled or sustainably sourced materials, designing products to reduce energy consumption and greenhouse gas emissions, and enhancing product repairability and recyclability. Packaging should be kept to a minimum and, where used, should be made from renewable or recyclable materials. Upon request, suppliers should also be able to provide eco-labels or certifications that align with recognised environmental standards, such as ISO 14024.

## **Conflict Minerals**

StarHub is committed to responsible sourcing and expects its suppliers to ensure that materials used in products supplied to StarHub do not directly or indirectly contribute to armed conflict, human rights abuses, or unethical mining practices. Suppliers must take

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reasonable steps to ensure that any tin, tantalum, tungsten, or gold (commonly referred to as "3TG") sourced as part of their supply chain does not originate from conflict-affected or high-risk areas, unless they can demonstrate responsible sourcing practices in line with internationally recognised frameworks such as the OECD Due Diligence Guidance for Responsible Supply Chains. Suppliers are expected to maintain transparency in their mineral sourcing and to cooperate with **StarHub's** requests for information regarding the origin of materials used.

#### Responsible Use of Information

**StarHub** holds the security, confidentiality, and proper use of information as a critical responsibility in all business relationships. Suppliers are expected to exercise the highest standards of diligence when handling proprietary, confidential, or personal data obtained through their engagement with **StarHub**.

#### **Insider Trading**

Suppliers must not buy, sell, or otherwise deal in **StarHub** securities—whether directly or indirectly—while in possession of inside information. Inside information refers to any non-public, material information about **StarHub's** business, financial status, operations, or strategic decisions. Suppliers are also strictly prohibited from sharing such information with third parties for the purpose of influencing investment decisions. Any misuse of insider information constitutes a serious breach of contract and may lead to legal consequences under applicable securities laws.

#### **Proprietary Information**

In the course of working with **StarHub**, suppliers may access sensitive or proprietary business information, trade secrets, or intellectual property. Such information must be securely handled and used solely for the fulfilment of contractual obligations with **StarHub**. Disclosure or use of proprietary information for any other purpose is not permitted without prior written approval from **StarHub**. Suppliers must implement robust information security controls to prevent the unauthorised access, misuse, loss, or theft of any proprietary information entrusted to them.

#### **Personal Data Protection**

Suppliers must comply with all applicable personal data protection laws and regulations, including Singapore's Personal Data Protection Act 2012 (PDPA), the EU's General Data Protection Regulation (GDPR) where applicable, and any other relevant data protection standards based on the jurisdictions in which they operate. Suppliers are required to put in

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place appropriate physical, technical, and administrative safeguards to ensure the confidentiality, integrity, and security of personal data.

Personal data shared by or collected on behalf of **StarHub** must only be used for the specific and authorised purposes for which it was provided. Suppliers must ensure that such data is not retained longer than necessary, and is securely disposed of when no longer required. Cross-border data transfers must only occur with the appropriate safeguards and legal bases in place, including the provision of a standard of protection in relation to such personal data that is comparable to the protection applicable thereto under the PDPA and any requirements set out in any advisory or other guidelines issued from time to time by the Personal Data Protection Commission.

### **Cybersecurity and Data Breach Protocols**

Suppliers are expected to maintain a cybersecurity framework aligned with industry-recognised standards, such as ISO/IEC 27001, NIST Cybersecurity Framework, or equivalent. This framework should be designed to protect against data breaches, system intrusions, malware, ransomware, and other cyber threats. At a minimum, suppliers must implement technical and organisational controls that include the use of regularly updated antivirus and anti-malware software; strong access controls with multi-factor authentication; and encryption of data both at rest and in transit. In addition, suppliers are required to maintain secure network configurations—such as firewalls and intrusion detection systems—and conduct periodic vulnerability assessments to identify and remediate security risks in a timely manner.

In the event of a data breach or security incident involving **StarHub's** information, suppliers must notify **StarHub** immediately upon discovery, and provide a full incident report including the nature of the breach, systems affected, mitigation steps taken, and actions to prevent recurrence. Suppliers must fully cooperate with **StarHub** in investigating the breach and mitigating any potential harm or liability arising from it.

### **Communication**

Suppliers are responsible for ensuring that the principles and requirements set out in this Code are clearly communicated to all relevant parties within their organisation and supply chain. This includes employees, agents, contractors, and sub-suppliers involved in business activities related to **StarHub**.

Suppliers must take appropriate steps to promote awareness, understanding, and compliance with this Code across all levels of their operations. Where necessary, suppliers should provide targeted and adequate training to ensure that employees and partners understand their responsibilities under this Code and are equipped to act in accordance

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with its standards. **StarHub** expects suppliers to reinforce this commitment through ongoing communication and continuous education efforts that promote ethical, safe, and sustainable business practices.

## Risk Management

**StarHub** expects its suppliers to take a proactive and systematic approach to managing risks that may affect their ability to comply with the principles set out in this Code. An effective risk management framework is essential to ensure operational resilience, legal compliance, and ethical conduct across the supply chain.

### **Risk Management System**

Suppliers are expected to implement a risk management system that enables the identification, assessment, and mitigation of risks related to legal compliance, ethics, health and safety, labour rights, environmental performance, and other obligations outlined in this Code. Regular assessments of facilities, operations, and business practices should be carried out to ensure continued alignment with these expectations. Suppliers are encouraged to extend risk management practices to their own supply chains, ensuring that upstream partners also adhere to responsible business standards.

Suppliers must promptly notify **StarHub** of any known, suspected, or potential breaches of this Code. Early disclosure enables timely intervention and mitigation, and helps maintain the integrity of our supplier relationship.

### **Corrective Action Process**

Where non-compliance is identified, either by the supplier or by **StarHub**, suppliers are expected to take ownership and implement appropriate corrective measures. This includes conducting an internal review, developing a corrective action plan, and ensuring its timely execution to address the root causes of the issue and prevent recurrence.

Suppliers should monitor and evaluate the effectiveness of these corrective actions over time. Where necessary, suppliers must revise their action plans or introduce additional controls to ensure sustainable improvements. **StarHub** may support suppliers in this process where appropriate, with the aim of fostering continuous improvement and stronger compliance practices.

### **Due Diligence and Audits**

To uphold transparency and accountability, **StarHub** reserves the right to conduct due diligence assessments or audits on its suppliers to verify compliance with this Code. This may include requests for relevant documentation, such as policies, procedures, training

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records, compliance evidence, or access to facilities, employees, and subcontractors. Suppliers are expected to fully cooperate with such reviews to maintain a trusted supplier relationship. Where applicable, suppliers must also be prepared to share specific data – such as environmental metrics, certifications, or audit findings – upon StarHub’s request to support performance monitoring and policy alignment.

### Reporting

StarHub is committed to maintaining a culture of openness, integrity, and accountability. We expect our suppliers to adopt similar values and to provide safe and effective channels for reporting concerns related to breaches of this Code or any unethical conduct within their operations.

### Protection of Identity and Non-Retaliation

Retaliation against individuals who report concerns in good faith is strictly prohibited. StarHub does not tolerate any form of retribution for raising ethical or compliance-related issues, and we expect our suppliers to uphold the same standard. Suppliers must establish secure and confidential mechanisms that allow their employees and stakeholders to report concerns freely, without fear of reprisal or adverse consequences. Confidentiality must be respected throughout the investigation and resolution process.

### Reporting Channels

Suppliers are encouraged to report any actual, suspected, or potential violations of this Code, or other unethical practices that may involve StarHub or its supply chain. Reports may be made through the following channels:

Concerns can be raised via email to [whistleblow@starhub.com](mailto:whistleblow@starhub.com) or [AC\\_Chair@starhub.com](mailto:AC_Chair@starhub.com). Alternatively, written reports may be submitted by post to the following address:

67 Ubi Avenue 1  
#03-01 Innovate @ Ubi  
Singapore 408942

Attention: **General Counsel** or **Audit Committee Chairman**

All reports will be handled with discretion, and appropriate follow-up actions will be taken to ensure fair and timely resolution.

### Further Information

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For additional guidance or to better understand related policies referenced in this Supplier Code of Conduct, suppliers may refer to the following documents and resources:

- [Anti-corruption, Corporate Gift & Hospitality](#)
- [StarHub Environmental Policy](#)
- [Whistle Blowing Policy](#)

For any specific enquiries, please contact your **StarHub** procurement representative or the **StarHub** Legal & Compliance team.

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