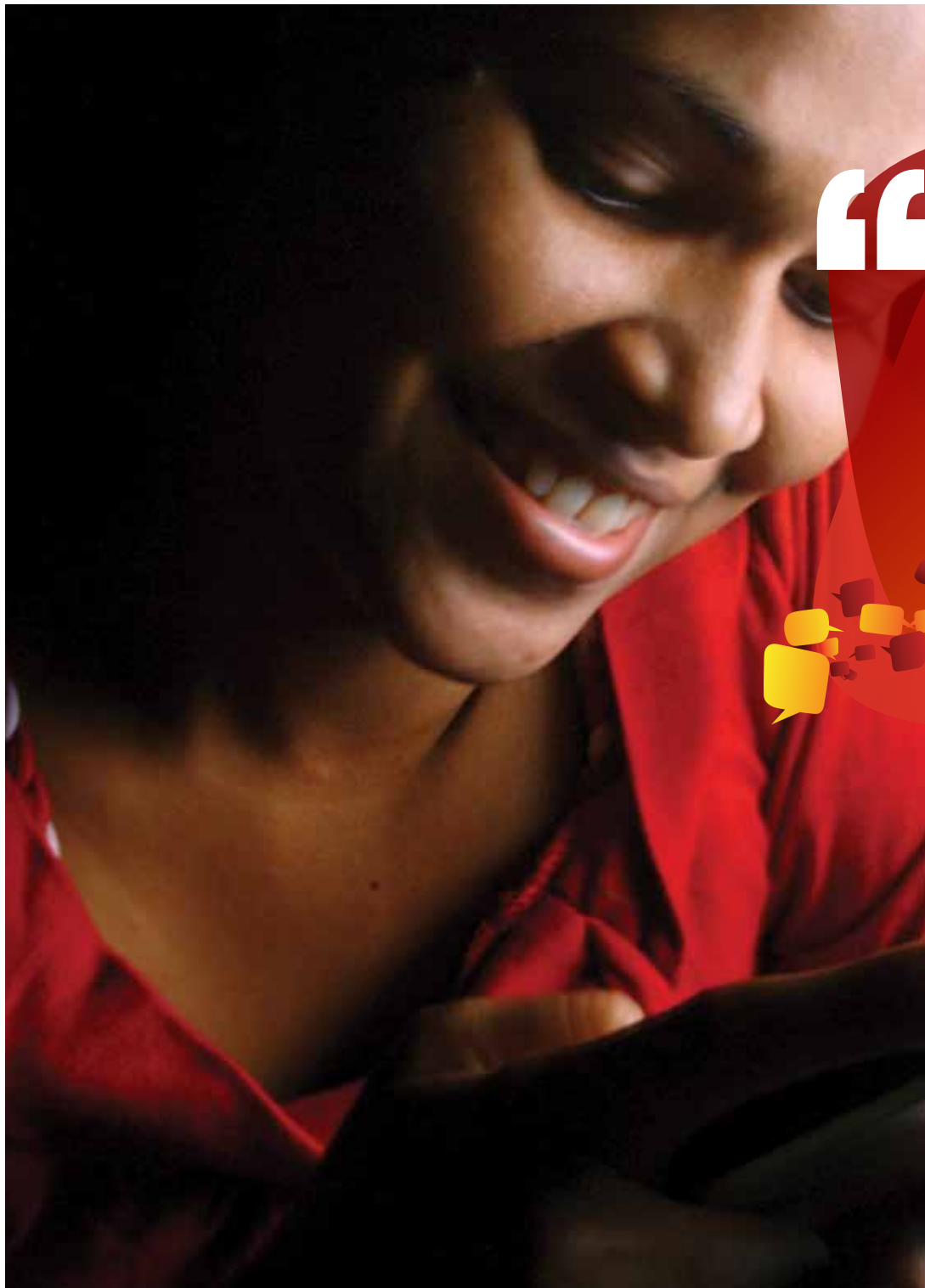


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Delivering
Shared Value

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Corporate Responsibility
at Dialog is founded on
managing the core operations
of our organisation in a
manner which delivers
sustainable (shared) value

”

Responsible Operations

(INTEGRAL CORPORATE RESPONSIBILITY)

Corporate Responsibility at Dialog is founded on managing the core operations of our organisation in a manner which delivers sustainable value creation, whilst simultaneously leveraging the pervasive attributes of ICTs to leapfrog developmental challenges and opportunities confronting our society and nation at large. Dialog employs a best in class CRM system to ensure that all product and service portfolios subscribe to the best of breed management outcomes. The main units tasked with managing the key aspects related to product responsibility and customer relations rests with Group service delivery, Group marketing and Group commercial who work with cross-functional business units and strategic service units to ensure all material issues are addressed proactively.

(Photo credit: Nilantha P. Wijayakumara)



Customer Relations and Product Responsibility


The material issues raised by customers comprised the following areas such as, the need for clarity in our marketing communications, service delivery standards, personal information data security and privacy protection, as well as protection of minors and health and safety concerns of our products and services, as well as about the measures we've taken to promote responsible content. In response to these issues, the Group continued with its efforts to consolidate all relevant operational guidelines and policies to improve its performance across all of the above aspects.

Service Delivery at Dialog Axiata serves as a benchmark in customer care here in Sri Lanka and the Asian Region. Dialog's Contact Centre is Customer Operations Performance Centre (COPC) 2000 CSP Standard release 4.2 certified, and is the first Sri Lankan company to serve with the global pinnacle of service standards. It also holds Certification of Compliance Level III to the People Capability Maturity Model, again the first and only Sri Lankan company to achieve this standard, by way of establishing and maintaining best practices with respect to the management and development of its workforce in the sphere of service delivery. In addition to following Six Sigma for improved efficiency, the Dialog Service Delivery team is ISO certified for process and best practice standards.

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Service delivery at Dialog serves as a benchmark in customer care in Sri Lanka



Customer Satisfaction

Dialog's customer satisfaction surveys provide a means for customers to articulate their experience about our services including areas which need improvement. These feedback channels consist of both formal and informal feedback and use structured research to elicit customer perceptions on our service levels. These studies are done using internal resources as well as independent research agencies as required by the Group. The use of social media as a potent tool for determining customer feedback and discerning customer reactions has proven very effective in 2010 and has pointed out possible areas of change and improvement.

Maintaining Clarity in Our Communications

As stated in our 2009 Report, the Group does not trade any products or services that are deemed unlawful or harmful to personal health and safety. Dialog ensures that all its services and service offerings are underpinned by sound business ethics and accountability principles that contribute towards building trust and relationships between customer and organisation,

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This aspect of our business was included in the ISO 26000 gap analysis during the year under review.

in a sustainable and mutually beneficial manner. The Group Marketing unit is guided by a comprehensive communications and marketing guideline that helps the team to execute creative marketing campaigns without contributing towards ambiguity and stereotyping of any segment of society. The guideline will be further refined in 2011, and positioned as a Group policy on the recommendation of the ISO 26000 gap assessment against core principles conducted by the Group. The Group also ensures that its products and services do not have any negative social influences in 2010. Furthermore, the Group does not condone any form of discrimination including (but not limited to) those based upon race, religion, gender and age. In order to achieve this, Dialog makes sure that its marketing and public relations communications do not carry/communicate any statements or visual presentations which are considered offensive in its widest context. In order to also enhance clarity of services offered, Dialog publishes user guides for most of its services in order to increase customer awareness on the respective products and services. The Dialog GSM Postpaid starter pack and the eZ Pay starter pack are examples of how Dialog's service offering is aligned with customer safety and clarity.

Privacy Protection

Dialog adheres to a zero tolerance policy on customer data privacy issues. The Group has strict guidelines and processes in place that ensure internal data management systems are secure and accessed under only as per the Groups Code of Confidentiality. The said Code provides a transparent account of responsibilities and instances when conditional disclosure of information is called for by relevant authorities such as the Ministry of Defence, the Courts of Sri Lanka and the Sri Lanka Police. Customer complaints related to privacy recorded in 2010 were recorded at 0.0009% per customer. Dialog Mobile continued to offer the Dialog SMS Block service that provides a safeguard against text messages from unauthorised persons through password protection. More information on Locked SMS is available at:

 <http://www.dialog.lk/personal/mobile/features-and-vas/messaging/sms-block/>

Ensuring Health and Safety

Dialog's health and safety impacts are primarily an outcome of its provision of connectivity services and products. Dialog ensures that all devices sold conform to CE and Specific Absorption Rate (SAR) values and obtains certification of same from all significant vendors. Dialog also ensures that all BTS sites conform to ICNIRP and TRCSL threshold values for EMF. In addition, the Group also ensures that all our ICT for Development and Research and Development Programmes are vetted against health and safety impacts as a precautionary measure. As alluded to in our previous Report these concerns are captured in the concept

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papers presented to the management at the outset of the development process. Health and safety concerns regarding the Group's mobile base stations have been a growing concern among customers and other stakeholders alike during the 12-month period. Dialog has an open communication policy and has made reasonable efforts to discuss and educate communities and customers on the Group's approach and safeguards against potential health and safety issues. In this regard, Dialog's base stations are strictly monitored and regulated by the Telecommunications Regulatory Commission of Sri Lanka (TRCSL) who enforces strict criteria and approval processes to ensure that operators comply with electro-magnetic radiation levels as indicated by the ICNIRP standards. Dialog will carry out a risk assessment in its BTS sites and present a guideline for the outsourced contractors engaged in the locations.

Protection of Minors

Dialog was the first signatory to the GSM Association's Mobile Alliance Against Child Sexual Abuse in Sri Lanka. As a full member, Dialog holds the distinction of being the first telecom operator in Sri Lanka to implement necessary steps to prevent mobile users from accessing child sexual abuse content through mobiles in association with the National Child Protection Authority (NCPA). In addition to the alliance commitments, Dialog continued its commitment to protect children from online exploitation in 2010 through Dialog Broadband Networks (DBN), a subsidiary of Dialog Axiata. As alluded to in the 2009 Report, DBN introduced a service for its customers titled Website Filtering, which has been a very effective and useful tool for parents requiring a safe web environment for their children using Dialog Broadband Services. This service was launched with the objective of promoting a safe online environment for children by filtering websites that contain explicit and damaging content such as pornography, gambling, violence and drug-related material. More information on website filtering is available at:



<http://www.dialog.lk/news/dialog-broadband-to-protect-children-in-cyberspace/>




Community Relations

The Group manages its community relations via an intricate stakeholder interfacing structure that comprises Group Sustainability and Corporate Affairs, Group Regulatory Liaisons, Group Service Delivery and Group Distribution Services. Dialog's operations are non-extractive in nature and therefore, detailed social impact assessments are not performed by the Group, since Dialog's community impacts are relatively low. Dialog does, however, engage proactive stakeholder engagement with all stakeholders including communities in an effort to mitigate and maintain a healthy dialogue with local communities in order to acquire a clear understanding of how its socio-economic and environmental impacts influence their lives and livelihoods. Dialog's community impacts are predominantly *in situ* based and fuelled by perceived fears over the siting of base stations and similar network infrastructure. As discussed in previous Reports the Group does not have a formal Social Impact Assessment process (SIA) to measure its community impacts. Issues raised by stakeholders (community included) are escalated and addressed by the Group Enterprise Risk Leadership Committee. The Group's only formal community consultation process is dependent on stakeholder requests when base stations are erected across the island. These consultations are done in conjunction with the relevant regulatory authorities such as the Telecommunications Regulatory Commission of Sri Lanka (TRCSL), the Ministry of Health (MoH) and the Central Environment Authority (CEA) to ensure that impartiality

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Our actions will be informed by our stakeholder engagement process and will shape accordingly our decision-making and operational impact along TBL dimensions

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and transparency is maintained. The process of mitigating community concerns over base station siting has seen an increase, perhaps due to the cumulative base stations being built across the industry. Dialog complies with all regulatory guidelines. Nevertheless, there are occasional incidences of community dissatisfaction over perceived health and economic risks associated with site acquisition for new base stations. Feedback from the community is escalated at the ERMLC where they are discussed and addressed. Furthermore, feedback from the community is captured through formal research and fed into planned business strategy and product/service strategy formulation. Dialog's Tradenet initiative, Green Base Station trial and the mobile waste take back initiatives are some of the outcomes of this strategy. Dialog's extensive community investment portfolio is captured under the 'Dialog and Development' section of this Report in greater depth.

Dialog is a member of the working group of the mobile development index convened by the GSMA, which aims to develop a comprehensive tool that enables the measurement of the impact of mobile interventions across development agendas.

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Empowering Our Retail Network

Dialog continued to build on its flagship initiative that completed its third year of operations in 2010. The Dialog Viyapara Diriya programme focuses on empowering the Group's retail network and forms an important element of the Company's downstream supply chain development strategy. Dialog's efforts to empower its retail network gained recognition when it was featured by the Harvard Business School and the International Finance Corporation for its groundbreaking work on creating inclusive business networks capable of delivering shared value to citizens, particularly at the base of the pyramid. The Dialog Viyapara Diriya programme was jointly funded by the IFC for the second year running in 2010, and continues to train and impart business training to small and micro entrepreneurs across the country. The training programmes cover business management capacity building and training in areas such as accounting and finance, business planning, human resources, marketing, sales, operations and information technology. The Group also distributes and administers the website called 'SME Toolkit' in collaboration with the International Finance Corporation (IFC) to support small and micro scale entrepreneurs for their business development. More details on this project can be found at:

 <http://www.srilanka.smetoolkit.org/>

Dialog Tradenet

Tradenet is a powerful manifestation of the enabling potential of mobiles in particular and ICTs in general. Tradenet was innovated as a solution to bridge information asymmetry in the market especially for communities at the bottom of the pyramid. Tradenet is a multi-modal information platform (or a virtual marketplace) that enables dynamic matching of buyers and sellers, whilst also providing reference prices on demand. The platform currently enables anyone using a Dialog SIM to trade legal products and services using their mobile from anywhere. The platform collects, collates and disseminates information related to products and services across a range of parameters such as price, quantity, category, geographical location, etc. to buyers and sellers across all segments of social strata across the economic pyramid. The tradenet platform also has a quality and trust grading scheme that improves the reliability of the information available in the repository. The tradenet platform is built on a suite of ubiquitous GSM and web based technologies that allow seamless scalability and reach, especially in areas that display low levels of e-readiness. The tradenet platform has multiple access technologies and is delivered in trilingual format so that it is applicable to local communities. Content in the repository is user generated and therefore, has high relevance and acceptance among users of the system.

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Tradenet enhances productivity by making agriculture markets more efficient by reducing prevailing information asymmetry. While most farmers remain trapped in a poverty cycle, due to various reasons, Tradenet empowers farmers with relevant information enabling them to make informed decisions and bargain more for their produce. The lack of market linkages is also another primary challenge faced by SMEs in Sri Lanka. Tradenet provides a useful platform to make them visible to millions of potential buyers and sellers in Sri Lanka and globally.

Public Policy

As mentioned in our previous Report Dialog continues to work closely with policy makers from both Government and Non-Governmental agencies in order to ensure that the national vision for the telecom industry in Sri Lanka emulates the vision set forth for the organisation. The Company also holds membership in many national and international associations where it plays an active role in thought leadership concerning the telecom sector.

Shaping Sustainable Policies

The Group is a full member of the GSMA. Dialog is also actively involved in multiple working groups convened by the GSMA such as the Mobile Alliance Against Child Sexual Abuse, the Green Power for Mobile Working Group, The Mobile Development Index Working Group, The m-Health Working Group, the m-Woman Working Group to name a few. Dialog is also an active member of the CTO and participates in thought leadership development programmes on an ongoing basis. Dialog also leads many local policy development initiatives in the spheres of education, banking and finance, trade and commerce and health to name a few. The Group engages with key Ministries and policy makers to advocate a conducive environment and regulatory framework that creates an opportunity for the ICT industry at large to create shared value.

As alluded to in the 2009 Report, the Group continued to work with policy makers on the following specific programmes with a view to creating conducive regulatory environments. The Government led white paper titled the 2020 document provided an opportunity for Dialog to capture sustainability principles into the national vision and road map for the industry. In addition, Dialog also continues to work very closely with the Ministry of Education to mainstream distance education and provide parity education resources to all children in Sri Lanka, especially to those from disadvantaged backgrounds. The Group plays a lead role in setting the benchmark for environmental stewardship through its m-Waste programme which was the first formal corporate e-Waste programme in the country.

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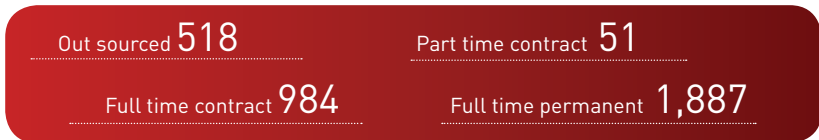


This aspect of our business was included in the ISO 26000 gap analysis during the year under review.



Our People

Dialog's people management processes are spearheaded by Group Human Resources and Development. The management of human resources is governed by a robust policy framework in accordance with EFC guidelines and labour laws of the land. Group Human Resources as of 31st December 2010, consisted of a total employee base of 2,922 employees, a further reduction compared to the 3,435 employees reported in 2009. In addition to the 2,922 employees, the Company also has an outsourced staff base of 518. The lower numbers are attributable to the Voluntary Retirement Scheme (VRS) offered to all employees during the course of the 12-month period ended 31st December 2010.



The total strength of the Company's workforce is depicted in Graph 05. Pursuant to Dialogs regionalisation of operations and with a network presence in all nine provinces of the country the Group has an island wide geographic dispersion of employees across

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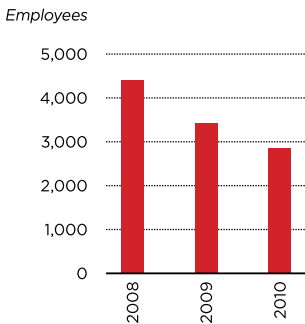


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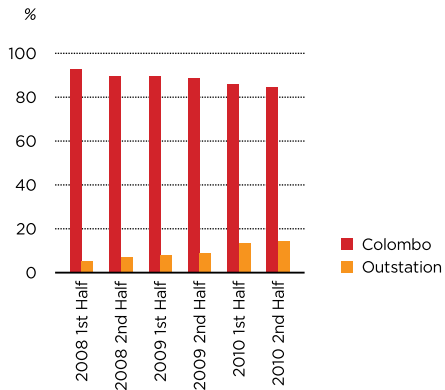
Adversity defines character and on the back of a very challenging and emotion ridden facet of a sustainability agenda, the Company has emerged stronger and significantly more capable of caring for its employees...



Sri Lanka. The distribution of employees by region is given in Graph 06. Consequently, the Group creates employment opportunities within various tiers across the country through its franchise operations, dealer and sub dealer network, as well as its extensive retail network.



Graph 05: Total employees



Graph 06: Staff distribution

Selecting the Best

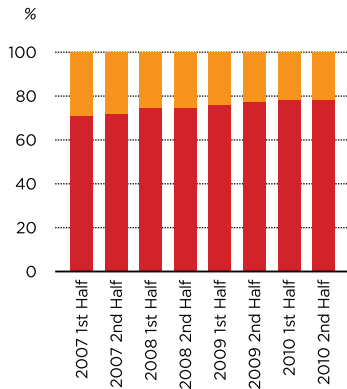
Dialog's recruitment policy focuses on non-discrimination and ensures that a transparent process is followed by adopting HR best practices with regard to employment recruitment across the Group. In 2010, 14 members of the Senior Management Team were locals and one member was a foreign national as opposed to the local and foreign ratio of 14:0 in 2009.

Employee Diversity

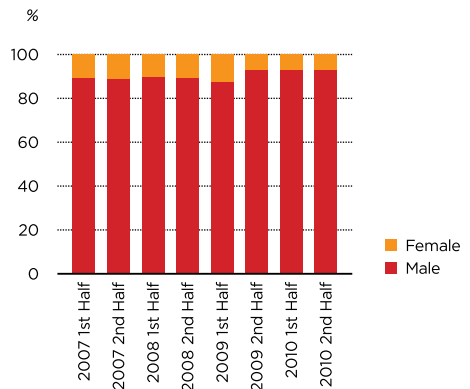
Dialog values diversity in the workplace and recognises that this tenet enhances our ability to adapt to changing market conditions and material stakeholder issues by utilising a diverse collection of employee skills and experiences. The diversity of our business organisation helps us to meet business strategy needs and the needs of customers more effectively leading to higher productivity, profits, and return on investment. Dialog does not discriminate or apply a bias on gender when appointing members to governance bodies/committees. Appointments are made purely on eligibility and business need devoid of any other discriminatory policy.

Senior Management

The Senior Management team which is a diverse group of professionals has a representation from both minority groups as well as different age groups. Graph 07 illustrates gender representation in the Senior Management team.



Graph 07: Gender representation of all staff



Graph 08: Gender representation in Senior Management

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Promoting Equality in the Workplace

The diversity of our workforce is an indication of the equal opportunity provided by the Group to individuals from different backgrounds and social strata. Discrimination of any kind is not tolerated within the Group. Policies and procedures such as the Dialog Code of Conduct and Recruitment Practices have ensured that Dialog adopts an unbiased philosophy irrespective of gender, cast, creed, ethnicity or any other differences. Gender is not a deciding factor in determining the remuneration package under any circumstance. In 2010, out of the total workforce, 78.51% were males and 21.49% were females as shown in Graph 06.

Employee Benefits

Dialog continues to make every effort possible to ensure that employee benefits are on par or better than industry benchmarks. An employee's basic salary is determined by taking into consideration the role along with the qualifications, experience and the competency level required by the candidate into account. Employees are also given the freedom to join welfare societies; which facilitate the social interests of the employees and is also extended to their immediate families subject to limitations as per benefit portfolio. Employees are eligible to participate in the Company Share Trading Scheme, subject to seniority in the Company and procedure governed by ESOS by-laws. Furthermore, a formal ceremony is organised annually to recognise and reward employees who have been in service for a minimum of 05 years in the organisation. Employee recognition at divisional level is carried out annually alongside the performance appraisal. The Company also provides employees with state-of-the-art facilities at work to enhance performance in their job roles. Dialog's standard entry level wage is greater than the minimum local wage.

Employee Turnover and Retirement Plans

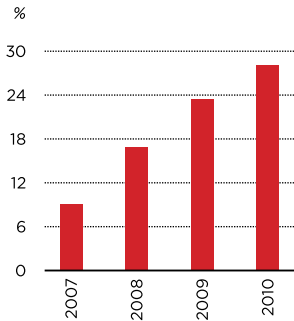
In 2010, the Group recorded an employee turnover rate of 28.04% inclusive of both ECM and non-ECM staff. As mentioned in the earlier sections of this topic, the high employee turnover is a result of the Group's Voluntary Resignation Scheme (VRS) in 2010. The total employee turnover from 2007 to 2010 is shown in the Graph 8. As mentioned in our previous Report, during the course of 2010, Dialog continued to engage in an aggressive programme of cost rescaling, workforce right-sizing and business and revenue growth. The Group launched a host of cost reduction initiatives and increased its competitive strength in the market place, enhanced its customer service levels and also applied focus on restructuring its work processes in terms of efficiency, productivity and automation. With respect to the latter dimension of performance optimisation, the journey Dialog embarked on in 2009 of aligning its human resource base to business requirements through the implementation of a VRS continued through 2010. Dialog also extended post-VRS training and career guidance to employees who opted for the VRS

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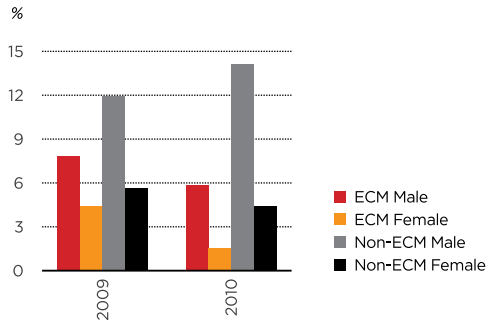


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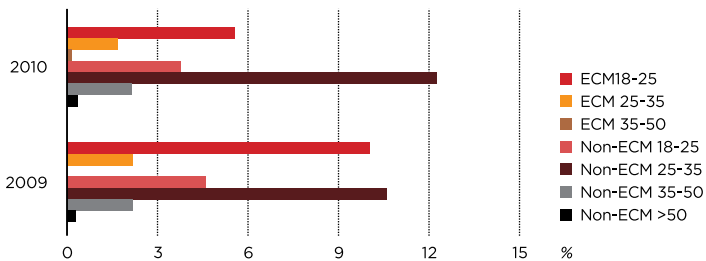
as a measure to assist them with securing new employment as it did in 2009. The Group uses general resources to pay the obligations to retired employees. In relation to the Employees' Provident Fund/Employees' Trust Fund (EPF/ETF), Dialog contributes a fixed percentage of an employee's remuneration to an external fund, details of which are given in the financial statements of the Dialog Axiata PLC Annual Report 2010. However, it must be noted that there is no liability on the Company's side at the time of termination of the employment contract. The Group's retirement plans are designed in accordance with the following Employee Acts: Gratuity Act of 1983, Employees' Provident Fund Act of 1958, Employees' Trust Fund Act of 1980.



Graph 09: Employee turnover rate



Graph 10: Breakdown of employee turnover rate (Gender ECM/Non-ECM)



Graph 11: Breakdown of employee turnover rate (Age ECM/Non-ECM)

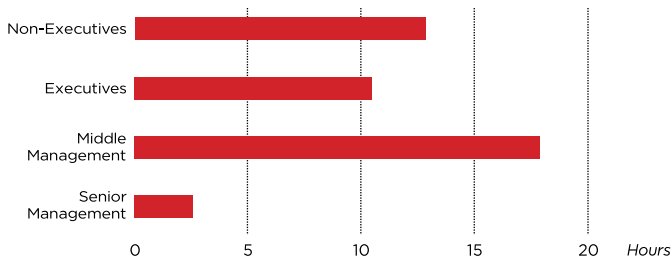
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Employee Development

The Group's skills development and training programmes comprise various areas ranging from soft skills to specialised training programmes that enable employees to meet the demands of today's highly competitive marketplace. These training sessions are conducted by professional trainers in the respective fields. Table 1 denotes the number of training hours allocated for all employees across all levels of the Group for 2010. The Group also provided special training sessions to those employees who left the Company through the VRS in 2010. A total of 54 hours was dedicated for this purpose with 18 employees being trained at these sessions. The Company also provided training to non-Dialog staff mainly consisting of dealers, sub-dealers and franchise service personnel, further to Dialog's internal training and development programmes. As mentioned last year, the Group also supported further studies and professional membership, encouraging employees to actively develop themselves to complement their current competencies.



Graph 12: Staff training hours per employee category

Ensuring Employee Health and Safety

Dialog has established a First Aid and Health and Safety team as well as a Risk Management team within the Group to assess the safety concerns of all employees with a 100% workforce representation in 2010. The Group will also include the outsourced cadre into these teams in the future. The Risk management Team also had a 100% workforce representation during the period ending 31st December 2010. Dialog also facilitated counselling sessions for employees who required psychological intervention during 2010. At the end of 2010, the Group recorded an employee absentee rate of 2.01% and 2.01% during the first and second halves of the year respectively. The injury rates for the same period were 2.20% and

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2.10% respectively for the first and second halves of the year. No occupational disease was reported during the year whereas a lost day rate of 2.1 was recorded. It must be noted that there were no fatalities in 2010. Dialog is committed to extend its best practices in health and safety to its sphere of influence to positively affect its outsourced parties during 2011. Outsourced employees are not included in health and safety committees. The Group also conducted various programmes related to personal well-being during the period of review covering areas such as women's health, dermatology, diabetic diseases and obesity, etc.

Employee Communications

Dialog is committed to safeguarding the fundamental rights of its employees, as stated in the Company's values. As a result, all employees are given the opportunity to exercise freedom of expression at their workplace at any given time. Internal employee communication mechanisms enable employees to raise their issues and concerns to the management at any given time in a fair and transparent manner. The Company practices an open work environment which facilitates both upward and downward communications in order to achieve constructive solutions with regard to any issues that may arise in relation to work. Divisional level staff meetings are held on a frequent basis too, for the dissemination of information.

Collective Bargaining

Dialog employees are given the freedom to associate as groups and individuals and raise their opinion to the betterment of staff, organisation and community. As mentioned in the previous year's Sustainability Report, the Company does not oppose collective bargaining and formation of Trade Unions. However, the Company does not have any registered Trade Unions at present but is a registered member of the Employers' Federation of Ceylon (EFC) who advises on social harmony to make employees more efficient and quality conscious. Dialog's association with such organisational bodies contributes towards maintaining a healthy work environment for employees in accordance with globally accepted employee protection laws. The Company's commitment to establishing and maintaining freedom of expression is manifested in the risk assessment study carried out by the Group in which no violations of freedom of expression or any other human rights abuses were reported. Dialog also practices the open door policy in the Group where the immediate supervisors and employees are empowered to discuss and settle on amicable solutions in case of clarifications, concerns and grievances. Dialog understands the importance of informing employees on new developments in the Company. Therefore, adequate notice as required is provided to employees prior to the implementation of significant operational changes that could substantially affect them. Since there is no tripartite collective bargaining involved, the Company permits employees to consult or negotiate on a case-by-case basis, which is fair, legally acceptable and done within the corporate legal framework of Sri Lanka.

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Compliance to Labour Laws

The Company does not employ any underaged individuals as part of its workforce. Similarly, as per the disciplinary records of Dialog, no complaints have been received from any employee with respect to forced labour. Further in the interest of employee safety, Dialog does not require female employees to work between 8.00 pm and 6.00 am of the following day. As explained in the 2009 Sustainability Report, all related policies/procedures of the Group, comply with the related labour laws of the country and no amendments to this have been made in the year in review. Employees' Letter of appointment/terms and conditions/working hours are decided in accordance with the Shop & Office Employees Act 19 of 1954, including the regulations and the subsequent amendments. Dialog is a member of the Employers' Federation of Ceylon (Federation for Employers) and all employment related documentations/transactions/payments and amendments are done, based on the guidance and advice received by industrial advisors/counsellors, in alignment with International Labour Organisation's (ILO) standards/requirements.

Promoting Business Ethics

There were no incidents of discrimination in any form during 2010. As demonstrated in our Group values, Dialog places good business practice amongst its top priorities. As a result, the Company takes strict disciplinary measures with those who violate the Code of Conduct, which outlines our Company's values and ethics. While this Code serves as an internal guideline for employees, the law of the land and its accounting policies form the ultimate policy framework for the organisation. While an awareness programme on business ethics was implemented within the organisation as discussed in the 2009 Sustainability Report, Dialog has also recognised the importance of designing a better system to address such matters. This will be done by way of formally announcing the Ombudsman process and reinforcing the concept of transparency and honesty. The appointment of the Ombudsman has been initiated and is expected to be finalised within the first quarter of 2011. An internal 'whistle-blowing policy' has also been approved at Dialog and was implemented during the course of 2010. All employees in the Company have signed the Code of Conduct and the Non-Disclosure Agreement. During the year 2010, 292 new recruits signed both the CoC and the NDA. All of the employees at Dialog have signed the NDA and CoC during the period of review.

Preventing Corruption in the Workplace

A total of six Strategic Business Units (SBUs) and twenty four Shared Services Units (SSUs) of the Company were analysed for organisational risks related to corruption during the reporting period. The assessment was carried out by three Divisions; Finance, Supply Chain Management and SAP. In order to minimise the possible risks of corruption within the organisation, employees are expected to sign a Non Disclosure Agreement (NDA) and Code of Conduct, which covers anti-corruption covering a total 100% coverage of the business units analysed. The Code of Conduct is available on the intranet for easy reference as necessary.

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Dialog Axiata PLC

No. 475, Union Place, Colombo 02, Sri Lanka.

Tel: +94 777 678 700

website: www.dialog.lk