

RELATIONSHIPS WITH BUSINESS PARTNERS AND VENDORS

StarHub is committed to the highest standards of business integrity in its dealings with its business partners and vendors. StarHub's relationships with its business partners, vendors and their respective officers, employees, agents and/or representatives are based on lawful, efficient and fair practices. We expect our business partners, vendors and their respective officers, employees, agents and/or representatives to comply with all applicable laws, including laws relating to employment, environment, health and safety, corruption and bribery.

We expect our business partners, vendors and their respective officers, employees, agents and/or representatives to comply with all applicable laws and regulations in relation to the giving and accepting of gifts, including the Penal Code and the Prevention of Corruption Act (and their successor legislations).

Under StarHub's Corporate Gift & Hospitality Policy, it is not acceptable for employees to receive gifts, entertainment, hospitality or other gratuities from people with whom we do business, which may put our employees in actual or perceived positions of compromise or conflict of interests. StarHub prohibits the giving, soliciting or receiving of kickbacks, favours, hospitality, gratuities, entertainment, preferential terms or anything of value by employees for their personal benefit from any business partner, vendor, customer or their respective officers, employees, agents and/or representatives, which may or may be construed to influence the employee's performance of his duties and affect his ability to act in the best interests of StarHub.

Accordingly, StarHub expects its business partners, vendors and their respective officers, employees, agents and/or representatives to avoid any circumstances which might create an appearance that they have offered gifts, entertainment, hospitality or other gratuities to StarHub employees to influence their contract negotiations or dealings with StarHub.